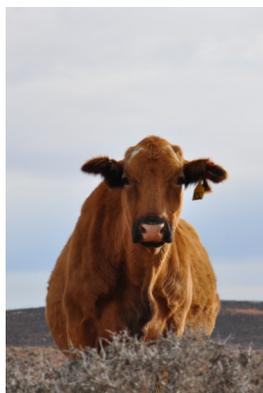


Livestock Grazing Plan Amendment EIS

**Preliminary Alternatives
Comment Report**



June 2016



**NATIONAL
CONSERVATION
LANDS**

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A	List of Commenters
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ACRONYMS AND ABBREVIATIONS

Full Phrase

AUM	animal unit month
BLM	United States Department of the Interior, Bureau of Land Management
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EIS	environmental impact statement
FLPMA	Federal Land Policy and Management Act of 1976
Glen Canyon	Glen Canyon National Recreation Area
GSENM	Grand Staircase-Escalante National Monument
MMP-A	Monument Management Plan Amendment
NEPA	National Environmental Policy Act of 1969
NPS	United States Department of the Interior, National Park Service

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CHAPTER I

INTRODUCTION

I.1 BACKGROUND

The United States Department of the Interior, Bureau of Land Management (BLM), Grand Staircase-Escalante National Monument (GSENM) is preparing a livestock grazing monument management plan amendment (MMP-A) and associated environmental impact statement (EIS) to guide management of BLM-managed lands within GSENM, as well as lands for which GSENM has administrative responsibility for livestock grazing. Livestock grazing on the affected lands are currently managed according to land use decisions set by four regional management framework plans signed in 1981: Escalante, Paria, Vermilion, and Zion (BLM 1981a, 1981b, 1981c, and 1981d) and by a subsequent plan amendment completed in 1999 (BLM 1999).

Under the National Environmental Policy Act (NEPA) and the Council on Environmental Quality's (CEQ) regulations for implementing the NEPA (40 Code of Federal Regulations [CFR], Parts 1500-1501), federal agencies are required to consider the environmental effects of their actions before taking such actions. Actions that are subject to the NEPA include projects and programs that are entirely or partially financed, assisted, conducted, regulated, or approved by federal agencies; new and revised agency rules, regulations, plans, policies, or procedures; and legislative procedures (40 CFR, Part 1508.18). The actions proposed by the BLM as part of the Livestock Grazing MMP-A are subject to the requirements of the NEPA.

I.2 PURPOSE OF AND NEED FOR THE MONUMENT MANAGEMENT PLAN AMENDMENT

Based on public comments on the preliminary alternatives and ongoing intra- and interagency coordination, the purpose of and need for the MMP-A continues to be refined.

This MMP-A is needed to integrate livestock grazing and rangeland management into the existing MMP. It also provides for the comprehensive, science-based management of livestock grazing that enables multiple use/sustained yield of renewable resources through improved land health. Land use plan decisions are needed to identify the lands available for livestock grazing, the amount of forage available for livestock, and possible grazing management practices, such as grazing systems, range improvements (including land treatments), seasons of use, and stocking rates (BLM 2005).

Updated land use plan decisions for livestock grazing are also needed to incorporate new information and the many changes that have occurred since the 1980s. Livestock grazing decisions for GSENM need to be consistent with Proclamation 6920, which created the National Monument.

The purposes of this MMP-A are as follows:

- Establish 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 practices
- Provide the land use plan level decisions needed to integrate livestock and rangeland management with the management of GSENM objects and other resources.

For the decision area in Glen Canyon National Recreation Area (Glen Canyon), the MMP-A ensures that the BLM's administration of grazing permits protects the park resources and values of Glen Canyon in accordance with the US Department of the Interior, National Park Service (NPS) Organic Act of 1916 (54 United States Code, Section 100101). It provides that the BLM accomplish the goals and objectives defined in the 1979 Glen Canyon National General Management Plan, the Glen Canyon Grazing Management Plan, and other applicable land use plans. These goals and objectives are in place to protect park resources and to avoid unacceptable impacts or impairment.

The purposes for Glen Canyon are the same as those for GSENM, with decisions to be made by the NPS in accordance with applicable laws and policy.

I.3 DESCRIPTION OF THE PLANNING AREA AND DECISION AREA

The planning area encompasses approximately 2,316,200 acres in Garfield and Kane Counties, Utah, and Coconino County, Arizona. The planning area includes all BLM-managed lands within GSENM and BLM- and NPS-managed lands for which GSENM has livestock grazing administration responsibility. This includes lands within portions of the BLM's Kanab and Arizona Strip Field Offices, as well as lands managed by the NPS in Glen Canyon.

The planning area is bordered on the west by Bryce Canyon National Park and the BLM Kanab Field Office; on the north by Dixie National Forest; on the east by Capitol Reef National Park and Glen Canyon; and on the south by the BLM Arizona Strip and Kanab Field Offices, Utah State and Institutional Trust Lands, and Glen Canyon. Small areas of state, municipal, and private lands are contained in the planning area (see Figure I-1, Planning Area).

The BLM's decision area for this planning effort includes all BLM-managed lands for which GSENM has livestock grazing management responsibility. This includes some lands within the BLM Kanab and Arizona Strip Field Offices. The NPS decision area includes lands in Glen Canyon for which GSENM has livestock grazing administration responsibility. The decision area totals approximately 2,253,700 acres of the planning area and does not include state, municipal, or private lands. Table I-1, Landownership, shows acres by landowner in the planning area and the decision area.

**Table I-1
Landownership**

Landowner	Acres
Planning Area	
BLM	1,934,800
NPS	318,900
State	19,900
Private	42,500
Total	2,316,100
Decision Area	
BLM, GSENM	1,866,500
BLM, Kanab Field Office	54,800
BLM, Arizona Strip Field Office	13,500
NPS, Glen Canyon	318,900
Total	2,253,700

Source: BLM GIS 2014

Note: Acres have been rounded to the nearest 100.

There are 96 allotments in the decision area, 20 of which (318,800 acres) are wholly or partially in Glen Canyon. The BLM administers these allotments in accordance with enabling legislation for Glen Canyon and by means of a memorandum of understanding and interagency agreement between the BLM and the NPS. Twenty allotments (65,500 acres) are wholly or partially within the BLM Kanab Field Office. GSENM has decision-making authority for allocation decisions related to these allotments. It also administers the permits in conformance with the Kanab RMP (BLM 2008b). The Sink Holes allotment (2,300 acres) is partially within the BLM Arizona Strip Field Office. GSENM has decision-making authority for allocation decisions related to this allotment; it administers the permit in conformance with the Arizona Strip RMP (BLM 2008c). The BLM Arizona Strip Field Office administers the Rock Reservoir allotment and Coyote allotment in GSENM.¹

Of the 96 allotments in the decision area, 84 allotments or areas, totaling 2,089,200 acres, are wholly or partially available for livestock grazing. This includes 35,500 acres that are unallotted for livestock grazing (1,600 acres in Glen Canyon). Livestock grazing could be authorized in unallotted areas, but they currently do not have any grazing preference allocated. The total grazing preference in the decision area is 106,202 AUMs. This includes 76,957 active AUMs

¹ There are two Coyote allotments, one administered by the BLM Arizona Strip Field Office and the other by the BLM GSENM.

(including from forage reserves) and 29,245 suspended AUMs. Of the 84 allotments that are available for livestock grazing, 79 have active permits. There are 91 permittees authorized to graze cattle and horses on these allotments.

I.4 DESCRIPTION OF THE ALTERNATIVES DEVELOPMENT PROCESS

The BLM developed a range of alternatives based on the issues presented in the Scoping Report (BLM 2014) and guided by established planning criteria (as outlined in 43 CFR, Part 1610). In compliance with the NEPA, the Federal Land Policy and Management Act of 1976 (FLPMA), CEQ regulations, and BLM planning regulations and guidance, the BLM has produced alternatives that accomplish the following:

1. Address the identified planning issues;
2. Explore opportunities to enhance management of resources and resource issues;
3. Resolve conflicts among resources and resource uses;
4. Meet the purpose and need for the MMP-A;
5. Are capable of implementation; and
6. Are feasible.

The preliminary alternatives were developed in coordination with the cooperating agencies, which are the NPS, the State of Utah, Kane and Garfield Counties, and the Natural Resources Conservation Service. The preliminary alternatives propose different scenarios for managing livestock and rangelands in the planning area. Planning issues raised during scoping and addressed in the alternatives are general livestock grazing topics, livestock grazing management practices, livestock grazing forage availability and allocation, and rangeland health.

I.5 DESCRIPTION OF THE PUBLIC INVOLVEMENT PROCESS FOR THE PUBLIC REVIEW OF THE PRELIMINARY ALTERNATIVES

I.5.1 Press Releases and Other Media Coverage

On November 18, 2014, the BLM issued a press release, inviting the public to three preliminary alternatives meetings to be held in Salt Lake City, Kanab, and Escalante. The press release was e-mailed to 640 individuals, agencies, and organizations. It provided the dates and venues for the meetings and a description of the various methods for submitting comments and provided dedicated e-mail and postal mail addresses. The press release was published in local newspapers: Wayne & Garfield County Insider (November 20, 2014), Southern Utah News (November 20, 2014), Deseret News (November 24, 2014), and St. George News (November 29, 2014).

I.5.2 Project Website

The BLM maintains a project website to keep the public informed about the MMP-A/EIS process. The website—<http://blm.gov/pgld>—contains background information, maps, status updates, and other material.

I.5.3 Public Meetings

The BLM hosted three public meetings to provide the public with opportunities to become involved, to learn about the project and the planning process, to meet GSENM MMP-A/EIS team

members, and to offer comments on the preliminary alternatives. As shown in Table I-2, Public Meetings, 80 people signed in at the meetings. The meetings were advertised via press release, the project newsletter, the project website, and phone calls from BLM staff to potentially interested grazing permittees. The locations of the meetings are also provided in Table I-2.

**Table I-2
Public Meetings**

Location (Utah)	Venue	Date (2014)	Number of Attendees*	Number of Completed Comment Forms Received
Salt Lake City	Utah State Capitol Building	December 2	15	1
Kanab	Kane County Search and Rescue Facility	December 3	28	0
Escalante	Interagency Visitor Center	December 4	37	0
Total			80	1

*Denotes the number of attendees who signed in; additional attendees were present at some locations.

The meetings began with a brief presentation given by Cynthia Staszak, GSENM Manager. They were followed by an open house, during which participants were encouraged to discuss concerns and questions with BLM and NPS staff representatives. Copies of the following documents were available at the sign-in station: project newsletter #3 (which included a summary and comparison of the alternatives), a summary of the preliminary alternatives, and a detailed narrative of the preliminary alternatives. Other information about GSENM was also available.

Blank preliminary alternatives comment forms were available at a commenting table where participants could write and submit comments at the meetings. Resource posters were displayed showing the planning area, acres available and unavailable for livestock grazing under each of the preliminary alternatives, and a timeline for the livestock grazing plan amendment NEPA process. Additionally, commenters were given the opportunity to rank the issues identified during scoping as Not Important, Somewhat Important, or Very Important on poster displays (see Section 2.2.2, Number of Comments by Category, for results).

CHAPTER 2

COMMENT SUMMARY

2.1 METHOD OF COMMENT COLLECTION AND ANALYSIS

All written submissions received or postmarked on or before January 26, 2015, were evaluated and are documented in this report. GSENM received a total of 367 written submissions (including form letters) during the preliminary alternatives comment period, comprised of 226 unique submissions and one form letter, resulting in 1,031 discrete comments. The most common format used for submissions was e-mail. Submissions were also hand delivered to GSENM offices, sent via US mail, or faxed. One comment form was completed and submitted at the public meeting in Salt Lake City.

A letter campaign by the Grand Canyon Trust and The Wilderness Society resulted in 141 submissions. Letters that represented variations of the form letter without significant additional information were treated as form letters. When additional information was added to the form letter, the information was entered into the comment-tracking database.

Examples of comments not considered significant, and therefore not entered into the comment-tracking database, are those that recounted general experience or information in GSENM without relating it to an alternative.

A list of commenters and their affiliations is provided in Appendix A, List of Commenters. The comment forms provided instructions for requesting confidentiality and for withholding individual names or addresses from public review or from disclosure under the Freedom of Information Act. Three submissions were anonymous.

To ensure that public comments were properly registered and that none were overlooked, the BLM used a multiphase management and tracking system. First, the BLM logged and numbered written submissions. Once all comments were received and documented, the BLM assigned each comment to one of the following categories:

1. Substantive comments about the alternatives
2. Comments in support of an alternative

3. Comments on the importance of scoping issues
4. Comments on the impacts of an alternative or aspects of an alternative
5. Comments on consistency with state, local, or tribal plans and policies
6. Comments that provided new data or science to consider
7. Comments on the NEPA process, compliance with laws, regulations, and policies
8. Comments on the project purpose and need
9. Comments that are out of scope
10. Editorial comments that do not change the intent of an alternative

To assist with the analysis, the BLM entered comments into a comment tracking database that allowed it to organize comments by planning issue categories and affiliation of the commenter. Finally, the BLM queried and tallied these identifiers to provide information on planning and other issue categories.

2.2 SUMMARY OF PUBLIC COMMENTS

Table 2-1, Submissions by Affiliation, shows the number and proportion of written submissions received from each type of affiliation. Commenters who submitted comments on business, agency, or organization letterhead or who signed using their official agency title were considered to represent that organization. All other letters were considered to represent individuals.

Federal agencies did not provide any written submissions, state agencies provided one written submission (less than one percent), and local governmental agencies provided seven written submissions (two percent). Submissions received from government agencies comprised less than three percent of the written submissions.

Tribal governments did not provide any written submissions, representatives from businesses submitted four submissions (one percent), and educational institutions submitted one submission (less than one percent). Members of the general public provided 340 submissions (93 percent) and nonprofit or citizen groups submitted 11 submissions (3 percent of the comments submitted during the preliminary alternatives public comment period). The BLM received three anonymous comments, accounting for less than one percent of the submissions. Appendix A is a list of commenters and their affiliations.

2.2.1 Written Submissions by Geographic Area

Table 2-2, Submissions by Geographic Location, shows the number and proportion of written submissions received by the sender's geographic location. Forty-eight submissions (13 percent) were from Garfield and Kane Counties, which are in the planning area. Of the remaining submissions, 71 (19 percent) were from commenters in other Utah counties; 120 (33 percent) were from other states; and 128 (35 percent) did not indicate a geographic origin.

Table 2-1
Submissions by Affiliation

Affiliation¹	Number of Submissions	Percent of Submissions
Government agency		
Federal	0	0
State	1	<1
Local	7	2
Tribal government	0	0
Elected official	0	0
Business/commercial sector	4	1
Educational institution	1	<1
Individual	340	93
Organization (nonprofit citizen's group)	11	3
Anonymous comment	3	<1
Total	367	

¹Letters on business, agency, or organization letterhead, or where commenters signed using their official agency title, were considered to represent that organization. Submissions on the BLM comment form provided at the scoping meetings and on the project website were assigned the affiliation that commenters noted on the form. All other letters were considered to represent individuals.

Table 2-2
Submissions by Geographic Location

Location	Number of Submissions	Percent of Submissions
Within planning area counties (Kane and Garfield)	48	13
Outside planning area counties, within Utah	71	19
Outside Utah	120	33
Unknown	128	35
Total	367	

2.2.2 Number of Comments by Category

Table 2-3, Comments by Category, shows the number of comments received in the submissions and the number of comments that were assigned to each category. Some comments were coded in one or more categories so the total number of unique comments is less than the sum total in each of these categories.

Of the 1,031 comments received, 659 (64 percent) suggested changes to a proposed alternative, suggested an entirely new alternative, or suggested that the BLM choose a combination of actions in the proposed alternatives. Of these comments, 240 (36 percent) related to livestock grazing issues of allotment boundaries, grazing permits, AUMs, and range improvements. The

**Table 2-3
Comments by Category**

Process Category	Number of Comments	Percent of Comments
Substantive comments on alternatives	659	56
Comments in support of an alternative	146	12
Comments on the impacts of an alternative or aspects of an alternative	227	19
Comments on consistency with state, local, or tribal plans and policies	9	1
Comments that provided new data or science to consider	37	3
Comments on the NEPA process, compliance with laws, and regulations	59	5
Comments on the project purpose and need	5	<1
Comments that were out of scope	27	2
Editorial comments that did not change the intent of an alternative	8	1

remaining comments (64 percent) related to other resource issues, such as soil resources, water resources, vegetation treatments, and recreation. The BLM received 227 comments (22 percent) concerning potential impacts on resources from the preliminary alternatives. Additionally, the BLM received 146 comments (14 percent) that were in support of one of the alternatives.

In addition, the BLM received 59 comments (6 percent) on issues to be addressed through policy or administrative action. These were general comments on the MMP-A planning process, collaboration, and requirements of NEPA and other regulations. Thirty-seven comments (4 percent) provided data or studies or suggested examples for the BLM to review.

The remaining 27 comments (3 percent) concerned issues that were beyond the scope of this planning effort. These comments were those to be addressed through national policy or administrative action, comments on implementation-level decisions issues that the BLM has addressed but should be better communicated to those who raised the issues, or issues beyond the scope of the MMP-A.

Comments are provided in Appendix B, Comments by Category; comment letters can be viewed in their entirety at GSENM headquarters in Kanab, Utah.

Substantive Comments Related to Alternatives

The BLM received 240 comments (50 percent) concerning changes or additions to the alternatives (Table 2-4, Substantive Comments Related to the Alternatives). Of these, 119 comments were about general changes suggested in the alternatives. These commenters requested that the alternatives include an objective for wildlife, require more public process regarding livestock grazing actions, and include enforceable standards for improving soils, water quality, and wildlife habitat. Many commenters also suggested that one or more of the alternatives conflict with the values mentioned in the Monument Proclamation.

**Table 2-4
Substantive Comments Related to the Alternatives**

Resource Category	Number of Comments	Percent of Comments
Alternatives (general)	119	24
Glen Canyon values and purposes	6	1
GSENM objects	18	4
Livestock grazing (AUMs and other forage)	40	8
Livestock grazing (general)	80	16
Livestock grazing (grazing management)	91	18
Livestock grazing (rangeland health)	26	5
Recreation and grazing conflicts	20	4
Science	24	5
Soils	20	4
Vegetation treatments (general)	41	8
Water resources	21	4

Many commenters suggested new components of an alternative, such as the following:

1. Install a buffer zone around the main Escalante Canyon and side canyons
2. Close Glen Canyon to grazing
3. Eliminate grazing for 15 to 20 years
4. Maintain water development for wildlife
5. Increase grazing
6. Allow the same level of grazing as when the GSEMN was designated

Also suggested was that a middle ground alternative be created, in terms of acres available and unavailable for grazing. Additionally, several commenters stated that the alternatives are too similar and should be modified to assess a wider range of alternatives.

A more detailed summary of each comment category is provided in Section 2.3.

Comments Related to the Importance of Scoping Issues

Table 2-5, Importance of Scoping Issues, summarizes responses about the level of importance of the major issues heard during scoping. Feedback was provided at the public meetings via the Action Walls and also via the comment form. Subtotals for both forms of feedback and the total of both forms of feedback are provided below.

The BLM received 227 comments on the impacts of the alternatives on resources. Commenters proposed potential impacts that may occur due to changes in management. These are direct and indirect impacts that occur due to management decisions within the MMP-A. Commenters requested that both the positive and negative impacts of grazing on resources be evaluated and considered in the MMP.

**Table 2-5
Importance of Scoping Issues**

Issue Topic	Very Important¹	Somewhat Important¹	Not Important¹
Use of specific type(s) of grazing management practices, generally	117 (93%)	6 (5%)	3 (2%)
Season of use (time of year when livestock are present)	144 (81%)	31 (17%)	3 (2%)
How long livestock are present (duration)	166 (91%)	13 (7%)	4 (2%)
Where livestock are located (distribution)	159 (88%)	14 (8%)	8 (4%)
How often areas are used by livestock (grazing systems such as rest-rotation, deferred rotation)	159 (90%)	13 (7%)	5 (3%)
Use of range improvements (fences, pipelines, troughs, seedings)	124 (71%)	38 (22%)	12 (7%)
Allocating AUMs based on amount and locations of available forage	110 (68%)	35 (22%)	17 (10%)
Grazing contributions to local income and tourist economy (economics)	52 (27%)	55 (29%)	83 (44%)
Maintaining grazing as a cornerstone of local culture	50 (26%)	38 (20%)	105 (54%)
Protecting biological soil crust and managing erosion	164 (85%)	15 (8%)	14 (7%)
Compatibility of recreational experiences with grazing activities	107 (58%)	60 (33%)	16 (9%)
Conducting ecosystem monitoring and adaptive management	154 (85%)	23 (13%)	5 (3%)
Understanding the relationship between grazing and healthy vegetation	173 (91%)	16 (8%)	2 (1%)
Effects of grazing on biological/ecological resources	166 (90%)	16 (9%)	2 (1%)
Protecting the quality and availability of natural water sources	174 (94%)	10 (5%)	1 (1%)
Protecting riparian areas	174 (94%)	10 (5%)	1 (1%)
Controlling noxious weeds and non-native invasive plants	162 (85%)	26 (14%)	2 (1%)
Ability to manage grazing and forage under climate changes & drought conditions	153 (85%)	21 (12%)	7 (4%)
Livestock damages to archaeological resources	147 (81%)	26 (14%)	8 (4%)
Protecting the objects of the Grand Staircase Escalante National Monument (geology, cultural resources, vegetation, soils, unique ecosystems)	160 (88%)	18 (10%)	4 (2%)
Maintaining wildlife access to water sources and habitat	174 (93%)	10 (5%)	4 (2%)
Preserving the values and purposes of Glen Canyon	130 (73%)	37 (21%)	12 (7%)
Respecting tribal interests and Native American religious concerns	129 (72%)	44 (25%)	6 (3%)
Reducing erosion and dust from destabilized soils	149 (82%)	31 (17%)	2 (1%)
Protecting scenic views, especially the views near Bryce Canyon National Park	127 (71%)	45 (25%)	7 (4%)

¹Number of comments (percentage of comments). Percentage is based on total responses for a single issue topic.

Comments Related to Impacts

Soil resources, water resources, recreation, and vegetation were specific resources that commenters suggested could be impacted by livestock grazing.

Comments on the impacts of livestock grazing on soil resources included the potential of concentrated grazing causing higher rates of erosion and degraded biological soil crusts. Commenters requested an analysis of these impacts in the MMP-A, and requested that mitigation measures be applied.

Comments related to the impacts of livestock grazing on water resources discussed the increased erosion and sedimentation rates from livestock grazing in or near riparian areas and the possible water quality and aquatic habitat degradation near these areas. Commenters suggested using water features to reduce impacts on water quality.

In addition, several commenters discussed the possibility of recreation and livestock conflicts. Some commenters presented the idea that conflicts between recreationists and livestock could present safety issues for both visitors and livestock. Also, some commenters requested that recreation be considered more important than grazing; conversely, some commenters requested that grazing be more important than recreation.

Finally, commenters discussed the impacts of grazing on vegetation. Commenters reasoned that grazing would impact vegetation by spreading introduced, invasive, and noxious species. They requested a discussion of these issues in the MMP-A, as well as implementing mitigation techniques.

Other Comments

Other comments submitted related to issues to be addressed through policy or administrative action. These comments were for agency consultation, public involvement, permits, approvals, laws, regulations, and policies. Specifically commenters mentioned the Taylor Grazing Act, the FLPMA, the NEPA, and the Monument Proclamation. Many commenters discussed implementation level decisions and requested specific management, depending on the location within the Monument. Additionally, several commenters requested clarification or addition to the purpose and need of the MMP-A.

2.2.3 Feedback during Public Meetings

Conversations between BLM representatives and the public during the preliminary alternatives meetings are summarized in this section. The BLM did not take or transcribe oral comments verbatim but will consider these comments and ideas as appropriate during the MMP-A/EIS process.

Attendees expressed concern regarding the history of livestock grazing in the area and the socioeconomic impacts associated with reduced grazing. Some commenters expressed concerns about the taking of water rights under Alternative B. Additionally, there were questions about the cost of compensation for range improvements if grazing were eliminated.

There were questions and concerns about the ratio of 80 percent grazed to 20 percent ungrazed areas under Alternative C. There were also questions about the release of Wilderness Study Areas under this alternative.

There were comments on fire frequency and how reduced fire treatments could influence the landscape.

Some attendees felt the range of alternatives was adequately covered, while others said there should be a new alternative or that an alternative should be eliminated from consideration.

2.3 SUBSTANTIVE COMMENTS RELATED TO ALTERNATIVES

2.3.1 General Comments

General comments are not alternative specific, or they may apply to multiple alternatives. Commenters requested that the following be incorporated into the alternatives:

1. Protection for wildlife habitat
2. More protection for biological soil crust
3. A process for more public involvement and transparency in livestock grazing actions
4. Quantitative and enforceable standards as objectives or goals, similar to Alternative C
5. A system of reference areas in order to evaluate grazed and ungrazed landscapes
6. Adaptive management as the basis for all alternatives
7. Issues associated with multiple not being considered
8. Drought management or climate change

There were a variety of comments regarding permit relinquishment or retirement. Some commenters wanted the BLM to include a provision to allow allotments to become free of cattle and for forage to be designated for another use if permits are retired or relinquished. Other commenters stated that permits should be reissued if they are retired or relinquished, citing Monument Proclamation language, federal laws, and consistency with state and local plans and ordinances. Commenters also requested more public involvement and transparency in livestock grazing decision-making and reporting.

Commenters suggested a variety of areas that should be unavailable for grazing, as follows:

1. Environmentally sensitive areas
2. Areas with unique characteristics or special value for their flora and fauna, scenic views, or outdoor activities
3. Sensitive riparian ecosystems, for example Paria Canyon, Hackberry, Last Chance, and Willis Creek; watersheds; sensitive soils, such as soils on steep slopes, soils susceptible to severe wind and water erosion, and soils that have been degraded from their potential after their vegetation groundcovers and biological crusts have been removed)
4. Areas of weed infestations, generally caused by livestock
5. The specific areas of Last Chance, Warm Creek, and Smokey Mountain Canyons and House Rock Canyon on Buckskin Mountain

Other commenters stated that all areas should be considered available for livestock grazing. They stated that reducing grazing numbers from those that existed before GSENM was designated in 1996 is inconsistent with federal law, the Monument Proclamation, Utah state law, local county land use plans, and the conservation district county resource assessment. Similarly, some commenters requested that the BLM consider an alternative that allows AUMs in suspension to become available. Comments stated that failure to consider a maximum sustainable grazing alternative is inconsistent with state and county plans, policies, programs, and ordinances. Also, failure to consider such an alternative means that the range of alternatives falls short of a full range.

Commenters questioned how the BLM determined which allotments would be available and unavailable in Glen Canyon under the various alternatives. They also asked that more information be provided, with consideration for not damaging or impairing the values, purposes, or resources.

Commenters asked the BLM to develop a map showing the areas suitable for livestock grazing or to conduct a carrying capacity analysis. Suggestions for unsuitable areas were as follows:

1. Slickrock, dry washes, inaccessible cliffs and mesas
2. Desert areas
3. Improved roads and other surface developments

Commenters said that the BLM should also consider variations in geology, soils, elevation, water availability for plants, distance from water, and climate. One commenter suggested allocating forage based on recommendations in Holechek et al. (1998). Holechek et al. suggested a ratio of 50 percent for watershed protection, 25 percent for wildlife, and 25 percent for livestock. One commenter provided some guidance for the BLM to consider when estimating forage production, focusing on areas regularly grazed. The commenter also suggested that the BLM distinguish between production of native forage from production of nonnative (seeded) forage.

Comments on the use of nonnative seeds to restore existing seedings was mixed. Some commenters questioned why the requirement for native species is appropriate only for a National Recreation Area (Glen Canyon) but nonnative species is appropriate for a National Landscape Conservation System unit (GSENM). Commenters also stated that the use of nonnative species is inconsistent with the Monument Proclamation, which encourages the maintenance and restoration of naturally occurring plant communities.

Some commenters pointed out that the decisions regarding seedings are existing decisions and not related to livestock grazing. They noted that the preliminary alternatives say the decisions will not be changed and so they should not be considered in the alternatives. Other commenters believe that there should be flexibility to use the best adapted species, with a focus on meeting plant functional diversity, cover, and density. One commenter suggested that machinery only be allowed when converting nonnative seedings to native seedings.

Commenters support adaptive management as a process for incorporating monitoring information, new scientific knowledge, and technology into achieving resource management

objectives with flexible guidelines. One commenter also stated that “best science” must be fact-based in order to justify any reductions or increases in livestock grazing. One commenter stated that the alternatives do not incorporate science into the process, such as utilization rates or stocking determinations. Two other commenters supported the concept of inventorying and monitoring, but one questioned whether such activities are properly identified as science. One commenter requested that the statement, “Livestock management actively promotes rangeland health through adaptive management principles and innovative livestock practices” be emphasized under all of the alternatives, except Alternative B.

One commenter stated that there should not be use in riparian areas that need to be restored or where a proper functioning condition assessment has not been completed or on range determined to be in poor condition. The commenter asserted that assessments should be completed before considering the alternatives. Because some of the alternatives include a goal to “manage livestock grazing to meet or make progress towards meeting rangeland health standards,” the commenter suggested that the alternative would provide for use where such standards are not met.

One commenter stated that the BLM has incorrectly used such methods as rangeland health standards on Glen Canyon lands. The commenter went on to assert that the NPS, with BLM assistance, should determine livestock stocking levels, season of use, and similar decisions in Glen Canyon.

Commenters questioned whether allowing/increasing/decreasing grazing is consistent with the objects presented in the Monument Proclamation. Several commenters requested that the objects in the Monument Proclamation be protected over grazing. A commenter requested that grazing management in Glen Canyon be consistent with that of GSENM. Commenters suggested more clearly defining the intent for BLM and NPS coordination, as well as differences in management requirements for each agency.

A commenter stated that only the negative impacts of grazing are discussed and requested that the benefits of grazing also be considered. Commenters suggested that the alternatives would allow recreation and grazing conflicts. One commenter suggested that recreation should take precedence over grazing; others suggested using management techniques, such as fencing and hiker mazes, and to distribute livestock over a larger area.

One commenter expressed concern about requiring a 0.5 mile distance buffer from water sources when salting. The commenter suggested adding an exception for non-riparian water sources. There were concerns about the various alternatives requiring shutoff valves.

2.3.2 Alternative A

One commenter stated that current management does not protect the objects for which the GSENM was established. Another commenter noted that current management does not address protecting biological soil crusts, which is recognized in the Monument Proclamation.

Commenters provided specific suggestions for editing or deleting certain actions under Alternative A; examples are water development, pasture rotation, riparian area fencing, nonstructural range improvements, and native and nonnative species use. One commenter

stated that grass banks and forage and other improvements on grass banks are generally not maintained because there is no permittee to do the work; thus, they are seldom useful when an emergency occurs.

2.3.3 Alternative B

Commenters stated that Alternative B is not reasonable because it conflicts with the Monument Proclamation and because the economic impacts on the rural communities surrounding GSENM would be devastating. Other commenters suggested that Alternative B is among the only alternatives that meet the BLM's mandate or objective to enable sustained use of the land through improved land health.

A commenter suggested considering an action regarding compensation for the value of grazing permits and for range improvements; these would be paid for exclusively by the permittee. If legal, it might also be used for any voluntary relinquishment of grazing rights, as discussed in other alternatives.

One commenter stated that Alternative B is not a good proposal from a scientific perspective because it would result in a loss of opportunities for science. The commenter specifically mentioned comparing the impacts of grazing to ungrazed areas in proximity over the long term.

2.3.4 Alternative C

Several commenters requested that Alternative C include all of the components of the Sustainable Grazing Alternative that were originally submitted, including the following items:

1. A goal that wildlife habitat be protected from cattle
2. A process for more public involvement in grazing management decision-making (e.g., public review and comment on grazing EAs, annual permit meetings open to the public, review of monitoring data, and using the public to do monitoring)
3. A process to allow allotments to be retired when permits are relinquished
4. Protective measures for biological soil crust, endemic and other native plant species, unique and isolated plant communities, pollinators, riparian areas, and archaeological/cultural sites

One commenter noted that Alternative C is not compatible with the requirement in the Monument Proclamation that nothing in it be deemed to affect existing permits or leases or levels of livestock grazing and that grazing would be governed by applicable laws and regulations.

Commenters stated that the status of allotments being available or unavailable should be fluid, as called for in the alternative submitted by Grand Canyon Trust and others. A commenter clarified the meanings of terms such as closed and unavailable as used in the alternative submitted by Grand Canyon Trust and others.

Commenters questioned the basis for the 80 percent figure used throughout Alternative C as a measure of comparison between grazed and ungrazed reference areas.

Commenters identified specific areas that should be unavailable for livestock grazing due to land health concerns, resource concerns, or conflicts with recreation: Dry Fork, Coyote Gulch, Willow Gulch, 50 Mile Gulch, Davis Gulch, the area east of Dry Fork to the Escalante River (including the Scorpion area and Les George Point), and tributary canyons of Escalante River. Other commenters asked that natural water resources, riparian areas, archaeological sites, tribal interests, and religious concerns be protected.

One commenter stated that there appeared to be conflicts between actions requiring a rider for allotments not meeting objectives and another that would put such an allotment into nonuse. Another commenter stated that the requirement that utilization be cut from 30 percent to 25 percent during drought conditions is problematic because it would be difficult to distinguish between those two levels. The commenter also questioned the basis for the difference between 25 and 30 percent.

Most commenters stated that only native seedings should be allowed under Alternative C, in accordance with the MMP, the Monument Proclamation, and guidance for National Landscape Conservation System units. Other commenters stated that efforts should focus on restoring ecological processes, using methods that give the highest probability of success.

One commenter stated that Alternative C should not limit the kind of livestock to cattle and horses when the area was historically used as a major sheep wintering area. The commenter also suggested that instead of the requirement that areas not be grazed more than two out of three years, season of use should move more toward winter use.

2.3.5 Alternative D

Commenters stated that Alternative D does not fully represent the State and County plans, policies, and programs. They further stated that the alternative should not be characterized as representing such plans, policies, and programs. Specifically, Garfield County's plan, policy, and program calls for maximum sustained livestock grazing use consistent with the FLPMA, the Taylor Grazing Act, and rangeland health standards.

Other comments note that State and County ordinances should not be used as a basis for designating healthy landscapes that support multiple uses; instead, they noted that new and improved federal practices and standards, along with established effective practices and standards, be employed.

Commenters requested that the following be included in Alternative D:

1. More cattle and goats
2. A rationale for making the identified areas unavailable for livestock grazing and why grazing could not be reintroduced at some time
3. The values of the grazing industry be identified
4. Grazing be recognized as a heritage activity that provides an important sense of public and local connectivity to the land

A commenter requested that those allotments or pastures identified as forage reserves be available for livestock grazing; these allotments are Little Bowns Bench, Deer Creek (Wolverine Pasture), and Phipps (Phipps Pasture). The commenter further asked that three allotments identified as unavailable for livestock grazing—Escalante River, Spencer Bench, and Rattlesnake Bench—instead be managed as forage reserves.

One commenter questioned the limit on the size of forage reserves. Another requested that forage reserves be available at least every three years to any permittee if they are not being used for emergency use. Other commenters requested clarification in the document for such things related to forage reserves as maintenance responsibility, decision-making authority, and reason for use.

Commenters request that grazing be allowed on the Escalante River during winter under a rotation system to reduce Russian olive and improve access for hiking and horseback riding.

A commenter stated that the description of the AUMs in the alternatives text and summary tables is misleading, giving the impression that stocking rates would be increased immediately under Alternative D. Stocking rates would be increased based on monitoring of resource conditions. One commenter questioned if 76,957 active AUMs is attainable under this alternative.

A commenter pointed out that without quantitative assurances, the promise that seed mixes will contain native species does not provide much assurance because even a small amount would satisfy the requirement.

Commenters were concerned that Alternative D would allow the use of machinery for certain treatments in primitive zones; they state that this seems to conflict with the statement for all alternatives that information in the MMP relevant to livestock grazing would not be modified or changed by any alternative.

Commenters expressed concern over prioritizing recreation in the front country and passage zones and livestock grazing in the backcountry and primitive zones. One reason in particular was that this could create problems for maintaining or installing water troughs and corrals that are next to roads.

Two commenters said the term “pre-1850 conditions” should be removed, as no credible information exists regarding what pre-1850 conditions looked like and if achieving such conditions is feasible. One commenter provided a specific edit regarding an action in Alternative D related to the installation of shutoff valves.

2.3.6 Alternative E

Two commenters stated that Alternative E is not very different from Alternative D. One commenter requested that Alternative E be replaced with a maximum grazing alternative. The reason given was because it is arbitrary and capricious for the BLM to develop a blended alternative before conducting a detailed environmental analysis. On the other hand, another commenter suggested that Alternative E places too much importance on livestock grazing and

allows too many acres for grazing along with other management practices, such as treatments and the use of nonnative seeds, which should not be allowed.

One commenter asked that the use of forage reserve allotments be allowed at least every three years by any permittee if the allotments are not being used for emergency use.

One commenter stated that a list of grazing systems should not be included because it implies a definitive list. The commenter also requested language be added to Alternatives C and D that flexibility in season of use be managed for condition and not calendar dates, as it is consistent with the Kane County RMP.

One commenter stated that decisions about dividing pastures is implementation level and not a planning-level decision. The commenter also asserted that Alternative E would illegally deny the NPS the authority to approve stocking decisions in Glen Canyon and would perpetuate the permit renewal process by using the 2001 Appropriations Rider and the Grazing Improvement Act. The commenter suggested that the BLM would not decrease stocking numbers even in allotments that do not meet rangeland health standards. This also would allow heavy machinery in the primitive zone, which was intended to be undeveloped for landscape level research on natural ecosystem processes.

One commenter provided a specific suggestion for editing text for Alternative E to provide justification for minimizing livestock/recreation conflicts. The commenter suggested specific changes to the language in Alternative E to clarify that visitor safety is a priority.

A commenter stated that GSENM should not be used as a laboratory for “innovative grazing techniques,” as described in Alternative E. The commenter’s rationale is that existing science and current conditions indicate that the BLM has failed to “apply science to management decisions, to hold permittees accountable for degradation and permit violations, to respond to public input, to include the public in livestock management decisions, to meet existing rangeland health standards, and to protect Monument resources.”

2.3.7 Suggestions for a New Alternative (or Alternative Component)

Several commenters suggested new components of an alternative. The BLM considered the recommendations and addressed them as follows:

1. Include a buffer zone around the main Escalante canyon and side canyons.

How addressed: In the revised alternatives, allotments surrounding Escalante Canyon would be unavailable for livestock grazing in Alternative C. Alternative C would also continue the unavailable status of allotments along the river in the decision area.

2. Come up with a middle ground alternative in terms of acres available and unavailable for grazing (something with around one million acres available).

How addressed: In the revised alternatives, the BLM looked at resource concerns and evaluated ways to alleviate such concerns. In the revised Alternative C, the BLM is looking at approximately 1,620,000 acres as unavailable for livestock grazing. The range of alternatives includes not only acres available and unavailable, but also AUMs available and unavailable, variations in thresholds of acceptable impacts, allowances

for structural and nonstructural range improvements, season of use, and preferences when permits are voluntarily relinquished. All of these components must be considered when evaluating the range of alternatives.

3. Close Glen Canyon to grazing; eliminate grazing in GSENM for 15 to 20 years; maintain water developments for wildlife.

How addressed: Alternative B would make Glen Canyon and GSENM unavailable for livestock grazing over the life of the plan. Water developments would be maintained in accordance with State water laws.

4. Increase grazing.

How addressed: The revised Alternative D seeks to restore suspended AUMs as forage becomes available. This would increase livestock grazing over current conditions.

5. Allow the same level of grazing as when the GSENM was designated.

How addressed: When GSENM was designated in 1996, the following allotments or portions of allotments were unavailable (or unallotted) and would remain unavailable for livestock grazing: Antone Flat, Big Bowns Bench (River pasture and a portion of Horse Canyon pasture), Deer Creek (Cottonwood and River pastures), Dry Hollow, Escalante River, Flag Point, Harvey's Fear, Long Neck, McGath Point, Muley Twist, Navajo Bench, Phipps (River pasture), Rattlesnake Bench, Rock Creek-Mudholes (Dry Rock Creek and Middle Rock Creek pastures), Saltwater Creek, Spencer Bench, Steep Creek, Varney Griffin, and Willow Gulch (Lower Calf Creek Falls pasture).

In addition to maintaining grazing at a certain level, grazing management would also remain the same as in 1996. This means that range improvements that existed at that time would be maintained but improvements created after that time would be removed and no new range improvements could be developed.

This alternative was eliminated from detailed analysis because it is inconsistent with the purpose and need for the MMP-A. Freezing grazing levels does not consider policy changes or new information or policy. It also does not identify guidelines and criteria for future allotment-specific adjustments or allow for the flexibility to adapt to new and emerging issues and opportunities through adaptive management.

Planning criteria also state that the BLM and NPS will use "current scientific information, research, technologies, and results of inventory, monitoring, and coordination to determine appropriate management strategies" and "the MMP-A will be based on the principles of adaptive management." Freezing grazing levels does not take into account current science, research, technologies, or inventorying and monitoring to integrate livestock grazing with other management decisions in the MMP. It also does not allow for adaptive management as grazing levels would remain constant.

6. Reconfigure allotments.

How addressed: Reconfiguring allotments is a decision to be made at the implementation level, or permit level. While one allotment, Mollies Nipple, is considered for reconfiguration in this plan, other allotments may be reconfigured during the permit renewal phase as appropriate to meet the goals and objectives of a given alternative.

7. Consider all of the planning area as available for grazing.

How addressed: The BLM and Glen Canyon reviewed the currently unavailable allotments to evaluate whether they could sustain any level of livestock grazing. It was determined that there are some allotments that cannot sustain any level of livestock grazing due to other resource concerns. These allotments or areas are: Big Bowns Bench (River pasture), Escalante River, Harvey's Fear, Muley Twist, Lake (portion of Navajo Point pasture), Navajo Bench, unallotted areas in Glen Canyon, No Man's Mesa Research Natural Area, Rattlesnake Bench, Rock Creek-Mudholes (Dry Rock Creek and Middle Rock Creek pastures), Spencer Bench, and Willow Gulch (Lower Calf Creek Falls pasture).

8. Ensure that archaeological remains are adequately protected.

How addressed: In considering resource concerns in the revised alternatives, known archaeological sites were mapped and inventories reviewed for evidence of site damage from livestock. Areas with such damage or high concentration areas susceptible to damage were made unavailable, particularly under Alternative C. Furthermore, under all alternatives, the BLM and NPS could fence archaeological sites if needed to protect them from livestock.

9. Move most AUMs into winter seasonal use.

How addressed: Appropriate season of use is determined during permit renewal. All alternatives would allow for adaptive management to change season of use as appropriate for each allotment.

2.3.8 Combination of Alternatives

One commenter suggested combining decisions regarding water-related improvements for Glen Canyon from Alternatives A and C.

2.4 SUMMARY OF CHANGES TO THE PRELIMINARY ALTERNATIVES

Based on public comments, cooperating agency coordination, and internal review of the preliminary alternatives, revisions to the preliminary alternatives have been made and are summarized here. The modified alternatives will be analyzed in the Draft EIS and will be available for a 90-day public review and comment with the Draft MMP-A/EIS (see Section 3.1, Summary of Future Steps and Public Participation Opportunities).

2.4.1 Alternative A

As Alternative A describes current management, there have been no substantial changes to Alternative A. Minor changes to further clarify current management based on BLM and NPS regulations and policies have been included.

2.4.2 Alternative B

In the preliminary alternatives, Alternative B identified only portions of allotments within GSENM and Glen Canyon as unavailable for livestock grazing. Portions of allotments in the BLM Kanab and Arizona Strip Field Offices remained available for livestock grazing. Based on further conversations with those field offices and clarifications of the management responsibilities for those allotments, the revised Alternative B now identifies the portions of allotments in the BLM Kanab and Arizona Strip Field Offices that the GSENM administers as unavailable for livestock grazing. Therefore, under the revised Alternative B, the entire decision area would be unavailable for livestock grazing.

2.4.3 Alternative C

In the preliminary alternatives, Alternative C closely mirrored a submittal received during scoping that the submitters called the Sustainable Grazing Alternative. The alternative reduced the acres available for livestock grazing and the amount of forage allocated to livestock compared with current management. It establishes large ungrazed reference areas over time to be used to enhance scientific study, especially the study of natural recovery in the absence of livestock grazing and the study of effects of livestock grazing compared to similar areas that are not grazed. This alternative emphasized management that prioritizes native species diversity. Existing nonstructural range improvements were to be restored for the purpose of ecosystem health with a preference for using locally derived native species. Areas that are currently unavailable and unallotted remained unavailable for livestock grazing. Additional areas were also identified as unavailable for livestock grazing based on resource and recreational concerns. When looking at these concerns, a diversity of ecological sites was also considered in order to develop a diversity of ungrazed reference areas in the future.

The revised Alternative C identifies additional areas as unavailable for livestock grazing from those identified in the preliminary alternatives. Approximately 1,619,800 acres would be available for livestock grazing under the revised Alternative C, a reduction of 315,600 acres from the preliminary alternatives. In total, approximately 28 percent of the decision area would be unavailable for livestock grazing under the revised Alternative C. While fewer acres would be available for livestock grazing under the revised Alternative C, more AUMs would be allocated for livestock than under the preliminary Alternative C. This is because areas identified as available for livestock grazing may fluctuate in the amount of forage that is available based on comparisons against the ungrazed reference areas. Alternative C would still establish large ungrazed reference areas over time and establishes measureable objectives, beyond agency Rangeland Health Standards, against which to measure grazed and ungrazed reference areas. If an area is not meeting the objectives, it is possible that the allotment would not be grazed, or would be grazed at a reduced rate, until objectives are met. Once objectives are met, grazing could continue at appropriate levels.

Other aspects of Alternative C remain largely unchanged.

2.4.4 Alternative D

Preliminary Alternative D recognized the historic and cultural importance of the livestock industry while emphasizing healthy landscapes to support multiple uses. It was designed to be as consistent as possible with State and County ordinances and plans. Livestock management

promoted rangeland health through adaptive management principles. This was to be accomplished by restoring existing nonstructural range improvements using a variety of treatment methods and doing additional range improvements to increase forage. Preliminary Alternative D also prioritized livestock grazing management over recreation in certain zones in GSENM, but prioritized recreational use over livestock in other zones in GSENM.

In the revised Alternative D, slightly fewer acres would be available for livestock grazing than under preliminary Alternative D. In total, 2,131,600 acres would be available for livestock grazing under the revised Alternative D, compared with 2,137,000 acres under the preliminary Alternative D. This difference of 5,400 acres is attributed to certain allotments or portions of allotments in GSENM and Glen Canyon that would remain unavailable for livestock grazing in the revised Alternative D. In other words, most allotments that are currently unavailable for livestock grazing would remain unavailable for livestock grazing in the revised Alternative D instead of being available as under the preliminary Alternative D. This is because the agencies determined that no level of livestock grazing in these areas could be sustained while meeting BLM Utah Rangeland Health Standards and other agency requirements, particularly on NPS-managed lands. The same AUMs would still be allocated for livestock with the goal of restoring all suspended AUMs to active use.

Other clarifications to Alternative D have been made where NPS management policies would not allow for certain uses, such as new nonstructural range improvements or the use of nonnative vegetation. The revised Alternative D also does not prioritize recreation over grazing or vice-versa anywhere in GSENM, as did preliminary Alternative D. Using adaptive management principles, education outreach, and other implementation-level management techniques such as hiker mazes, grazing and recreation would exist together in GSENM as it has in the past.

2.4.5 Alternative E

Preliminary Alternative E emphasized sustainable use through livestock management designed to ensure that BLM Utah Rangeland Health Standards were achieved and land health was improved. Most closed areas remained unavailable; two areas would be made available. Some unallotted areas would be made unavailable. Slightly fewer acres are available for grazing and less forage was allocated to livestock compared with current management. Existing nonstructural range improvements were to be restored for the purposes of ecosystem health and for forage production. Some livestock/recreation conflicts were to be reduced by changing the season of use for livestock grazing or limiting access by livestock.

Under the revised Alternative E, slightly fewer acres would be available for livestock grazing compared with the preliminary Alternative E. In total, 2,053,600 acres would be available for livestock grazing under the revised Alternative E, compared with 2,068,500 acres under the preliminary Alternative E. This difference of 14,900 acres is attributed to certain allotments or portions of allotments in GSENM and Glen Canyon that would remain unavailable for livestock grazing in the revised Alternative E. In other words, most allotments that are currently unavailable for livestock grazing would remain unavailable for livestock grazing in the revised Alternative E instead of being available as under the preliminary Alternative E. In addition, some of the currently unallotted allotments would be unavailable for livestock grazing due to such things as inaccessibility, lack of forage or water, and other resource needs. Approximately the

same number of AUMs would be allocated for livestock between the revised Alternative E and preliminary Alternative E.

Other clarifications to Alternative E have been made where NPS management policies would not allow for certain uses, such as new nonstructural range improvements or the use of nonnative vegetation.

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CHAPTER 3

FUTURE STEPS

3.1 SUMMARY OF FUTURE STEPS AND PUBLIC PARTICIPATION OPPORTUNITIES

The BLM will publish a Draft EIS that will present detailed analysis of the alternatives and will identify a preferred alternative. The BLM will distribute the Draft EIS, anticipated to be published in 2016, to elected officials, regulatory agencies, and members of the public; it will also make the Draft EIS available on the project website. The BLM will announce the availability of the Draft EIS via a Notice of Availability in the Federal Register, and a 90-day public comment period will follow. The BLM will hold public meetings near the planning area during this 90-day comment period.

At the conclusion of the public comment period, the BLM will review and analyze public comments and determine what changes need to be made to the document. The BLM will then revise the Draft MMP-A/EIS and will prepare a proposed MMP-A/final EIS, which will then be published. The BLM will announce the availability of the Proposed MMP-A/Final EIS in the Federal Register. Following the notice of availability, the BLM will open a 30-day protest period. Concurrently, it will request the governors of Utah and Arizona to review the Proposed MMP-A/Final EIS for consistency with approved state and local plans, policies, and programs.

At the conclusion of the public protest period and the governors' consistency review, the BLM will resolve all protests and inconsistencies. If necessary, it will publish a notice in the Federal Register requesting public comment on significant changes made as a result of protest. The BLM will then prepare the approved MMP-A and Record of Decision.

The NPS will also prepare a record of decision and will make a determination regarding impairment of Glen Canyon values and purposes. The BLM will announce the availability of these documents in the Federal Register.

On the project website, the BLM will publish all publications, including this report, newsletters, the Draft MMP-A/EIS, and the Notice of Availability, as well as pertinent dates regarding solicitation of public comments.

3.2 CONTACT INFORMATION

The BLM invites and encourages the public to participate throughout the MMP-A/EIS planning process. Some ways to participate are as follows:

1. Review the progress of the MMP-A at the project website, <http://blm.gov/pgld>, which the BLM will update with information, documents, and announcements throughout the duration of the MMP-A/EIS preparation
2. Request to be added to or remain on the official project mailing list in order to receive future mailings and information (e-mail BLM_UT_GS_EIS@blm.gov)

Anyone wishing to be added to or deleted from the distribution list, wishing to change their contact information, or requesting further information may e-mail a request to BLM_UT_GS_EIS@blm.gov or contact Matt Betenson, Associate Monument Manager, BLM GSENM, 669 S. Highway 89A, Kanab, Utah 84741, phone (435) 644-1200. Please provide your name, organization, mailing address, e-mail address, and phone number, as well as the preferred method to receive information.

CHAPTER 4

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Appendix A

List of Commenters

APPENDIX A

LIST OF COMMENTERS

The public comment period began on November 18, 2014, with the press release issued to local media outlets, posted on the project website, and e-mailed to approximately 640 individuals, agencies, and organizations on the project e-mail list. The comment period ended on January 20, 2015, although all comments received or postmarked on or before January 26, 2015, were included in this report. Table A-I, Commenters, lists the commenters who submitted written submissions to the BLM for the GSENM Livestock Grazing MMP-A/EIS as part of the public scoping process.

Affiliations were assigned based on self-identifying information in the submission. Commenters who submitted comments on business, agency, or organization letterhead or who signed using their official agency title were considered to represent that organization. Submissions on the BLM comment form provided at the scoping meetings and on the project website were assigned the affiliation that commenters noted on the form. All other letters were considered to represent individuals. The commenters are listed in alphabetical order.

Table A-I
Commenters

Commenter	Affiliation
<i>Business-Commercial</i>	
Grant Johnson	
Steve Roberts	
Franz and Margaret Shakespear	
Keith Watts	
<i>Education Institution</i>	
Kevin Heaton	
<i>Individual</i>	
Sandra Aberkalns	
Allan Ainsworth	
George & Frances Alderson	
Gary Allen	
Glen Allen	

**Table A-1
Commenters**

Commenter	Affiliation
Karl Allen	
Scott Allan	
Joanne Alt	
Melissa Amberson	
Julia Anderson	
Justin Anderson	
Alice de Anguera	
Nick Antonio	
Natalie Arndt	
Barbara Aronowitz	
Gary and Kathleen Austin	
Audrey Austin	
Katie Austin	
Reb Babcock	
Kyle D. Bailey	
Mark Bailey	
Martha K. Baker	
William L. Baker	
Dave Barger	
Aram Barsch	
Trina Barsch	
Susan Bassett	
Ryan Beam	
Joseph von Benedikt	
Scott Berry	
Bettina Bickel	
Mark Bily	
Mike and Jean Binyon	
Jen Blue	
Melanie Boone	
Dennis M. Bramble	
Erin Bramscher	
Mary Branscomb	
Michelle Breinholt	
Bryce Breslin	
Ted R. s Bright	
Bob Brister	
Kathrin Brock	
Darcey Brown	
Norris Brown	
Scott R. Brown, P.L.S.	
Worth Brown	
Amy Brooks	
Dean Brooks	
Bruce and Leah W Bunting	

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Brigitte Delthony	
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Bruce Etringer	
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Sherre Finicum - H	
Kathleen K Flaccus	
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**Table A-1
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Diane E Gentile	
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Rex Thomas Griffiths	
Tim Gruner	
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Ginger Harmon	
John and Darby Harmening	
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Judith Hopkins	
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Don Jackson	
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Kandice Johnson	
Kristine Johnson	
Lana Johnson	
Met Johnson	
Redge Johnson	
Kalen Jones	
Ursula Jongebloed	
Robert B. Kaplan	
Jan Karon	
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Jill Kellogg	
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Michael R Kelsey	
Amber Kelso	
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J.A. Kirk	
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Donna Morrall	
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Dennis L. Outwater, PhD	
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Dr. Charles M. Paden	
Laurie Parkinson	
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Becky Peterson	
Tim Peterson	
James Petet	
Carmen Phillips	
Scott H. Phillips	
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Arkay Pugh	
Quinn	
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Gary Roberts	
Tristine Roberts	
Susan Roche	
Michael Rolfe	
Dan Roper	
Martin Ross	
Phyllis Ross	
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Lisa Rutherford	
Karen Ryman	
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**Table A-1
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William H. Skelton	
Dennis Smith	
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Stephanie Smith	
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Craig "Sage" Sorenson	
Brandon Sortor	
Larry and Renae Spanne	
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Michael B. Stenson	
Sara Stenson	
Shane and Star Stotlar	
Dan Struble	
Joanna Sturm	
Bill Sturman	
Rebecca M Summer	
Brian Swanson	
Frederick Swanson	
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Toni Thiriot	
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Mimi Trudeau	
Ted Truex	
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S Volkmann	
Barbara Walker	
Jerome Walker	
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Chip Ward	
Tyler Ward	
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Kate Watters	

**Table A-1
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Commenter	Affiliation
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Janet Welch	
Leon Werdinger	
William Arno Werner	
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Jenae Westhoff	
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Nat White	
Frances Wilby	
Marcia E. Williams	
Peter Winn	
Kristin Womack	
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Gwendolyn Zeta	
State Government	
Kathleen Clarke	State of Utah
Local Government	
Brian B. Bremner	Garfield County
Scott R. Brown, P.L.S.	Elko County
James Matson	Kane County
Rex Sacco	Carbon County
Organization	
Dr. Sky Chaney	Taxpayer Association of Kane County
Mike Putiak	GSE Partners
Mary O'Brien, David deRoulhac, Phil Hanceford	Grand Canyon Trust and The Wilderness Society
Rose Chilcoat	Great Old Broads for Wilderness
Erika Pollard	National Parks Conservation Association
Jonathan B Ratner	Western Watersheds Project, Wyoming Office
Laura Welp	Western Watersheds Project
Dustin Van Liew	Public Lands Council and National Cattlemen's Beef Association
Bruce Bunting, Allen K. Henrie, Lonnie Pollock	Utah Association of Conservation Districts
Don Anderson	Utah Cattlemen's Association

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Appendix B

Comments by Category

INTRODUCTION

This appendix presents the substantive comments received on the preliminary alternatives. It is organized into sections by comment topic. It also includes comments that provide data to be considered, editorial changes to be made, and process requirements. Where no substantive comments on a subtopic were received, no subsection heading is listed.

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SECTION I - ALTERNATIVES GENERAL**Comment Excerpt Text:**

Use of land and water sources by wildlife must take precedence over use by livestock. Adequate separation of livestock and all activity related to grazing from areas needed by wildlife is necessary.

Comment Excerpt Text:

grazing by cattle or other animal not native to these arid lands should be strictly limited to areas covered only by the traditional legal grazing rights and, where possible, should not be allowed on any lands with remaining soil crusts [cryptogamic or cryptobiotic soils], significant native flora, springs, wetlands, or archaeological sites.

Comment Excerpt Text:

Action Statements that should be common to Alternatives C, D and E.

The Rider Action Statement on Page 36 should be added to the three alternatives. For more information see our comment on use of riders towards the bottom of Page I of this letter.

Reference Areas are not discussed in Alt D & E. We suggest Action Statements of some kind be added to Alt D & E, as these are valuable for comparing grazed to ungrazed land.

To Partners, forage reserves would be extremely useful in the future for the permittees, particularly if the forecasts on climate change are accurate. We suggest an Action encouraging the establishment of additional forage reserves when situations permit.

We do not believe that sub-leasing grazing permits to ranchers outside of the immediate region is appropriate in a National Monument within the National Conservation Lands System. We encourage you to insert an Action in Alt C & D identical or similar to the one in Alt E found towards the bottom of Page 56.

Please insert protocols for managing cattle in allotments with slot canyons in all three alternatives.

Comment Excerpt Text:

Adaptive management should be the basis for all Alternatives. Likewise, rangelands in the monument will be managed to achieve range health objectives regardless of the alternative chosen. This statement should be included in all Alternatives, again, with the exception of Alternative B, which would remove livestock grazing from the monument.

Comment Excerpt Text:

This portion of the table should be clarified to more clearly show the effects of each alternative.

	A	B	C	D	E
Permitted Use	106,202	3,125	40-45,000	106,202	75,000
Suspended Use	29,245	0	0	0	0
Active Use	76,957	3,125	40-45,000	106,202	75,000
Permit Reduction	0%	97%	58%	0%	29%
Active Use Change	0%	-96%	-42%	+38%	-3%

Comment Excerpt Text:

All alternatives should include a realistic and implementable monitoring plan to assure grazing objectives have been met

Comment Excerpt Text:

The current BLM process to devise a grazing management plan must take these values into account—not merely fiddle with the details of established livestock use, as it were. We should be taking a hard look at whether livestock actually belong on large areas of the monument at all.

Comment Excerpt Text:

Alternative C provides clear, measurable objectives and actions, which will help to determine whether the overarching goals are being met and where management changes should be made. In contrast, Alternatives D and E have many vague objectives and actions that do not include measurable outcomes. We encourage the BLM to incorporate more and better details for each alternative on how the objectives and actions will be measured and met.

Comment Excerpt Text:

Alternatives A, D, and E have some potential but also many flaws, such as: (1) Giving preference to recreation over grazing in front country zones; and (2) excluding riparian and other areas for grazing consideration in the evaluation process. All ideas should be on the table; and (3) your solution on voluntary relinquishment includes all proposed alternatives which is unacceptable because of the last action point, "amend or revise the land use plan to allocate forage to uses other than livestock grazing," which is arbitrary and vague.

Comment Excerpt Text:

Issues associated with multiple-uses were not considered during the adjudications and have yet to be considered.

Comment Excerpt Text:

Management goals should reflect the essence of NATIONAL conservation lands.

Comment Excerpt Text:

[FLPMA]

(n) Resource management plan means a land use plan as described by the Federal Land Policy and Management Act. The resource management plan generally establishes in a written document:

- (1) Land areas for limited, restricted or exclusive use; designation, including ACEC designation; and transfer from Bureau of Land Management Administration;
- (2) Allowable resource uses (either singly or in combination) and related levels of production or use to be maintained;
- (3) Resource condition goals and objectives to be attained;
- (4) Program constraints and general management practices needed to achieve the above items;
- (5) Need for an area to be covered by more detailed and specific plans;
- (6) Support action, including such measures as resource protection, access development, realty action, cadastral survey, etc., as necessary to achieve the above;

(7) General implementation sequences, where carrying out a planned action is dependent upon prior accomplishment of another planned action; and

(8) Intervals and standards for monitoring and evaluating the plan to determine the effectiveness of the plan and the need for amendment or revision.

The alternatives provided fail to provide a rational basis for its determinations as to what lands will be grazed. They fail to provide for 3, other than general, unmeasurable statements.

The alternatives fail to provide for 4, 6 or 8.

Comment Excerpt Text:

None of the alternatives that the BLM has any intention of selecting completely fail to deal with drought management or provide any science-based management requirements to deal with drought.

We have provided various drought research papers, management guidelines and drought policies from other agencies for your review. We recommend a drought policy similar to the Tonto National Forest's which we have provided copies of. This policy should be tailored to fit the differing climate patterns which would mean adjusting the SPI from -0.70 to something more applicable to Utah such as -0.85.

The MMP must specify that the drought policy will come into effect in the ROD and that permit terms and conditions will be updated to reflect the drought policy.

Comment Excerpt Text:

The MMP amendment must also provide feedback loops so that once Standards and Guidelines (S&G) evaluations are completed, that the BLM requires regular reviews to insure "significant progress" is being made.

Comment Excerpt Text:

The draft alternatives do not address climate change or drought protocols, which is a glaring omission given that drought is a significant impact on livestock management.

Section 1.1 - Alternative A

Comment Excerpt Text:

As managers of these public lands and resources the only alternatives that seem to meet your mandate are Alternatives A and B. The only alternative to meet your objectives seems to be Alternative B.

Comment Excerpt Text:

Page 14 GCNRA Vegetation Objective I

The objective is to maintain plant communities in as "natural" a community as possible. Natural is described as having the "full range of native species, a viable seedbank, and minimal undesirable increasers." There is no description of what an "undesirable" species is. This statement should clarify that a "natural" community as described could be met under grazing, and might even require some type of brush management – it would not be necessarily represented by the vegetation in an ungrazed reference area.

Comment Excerpt Text:

GCNRA Vegetation Action – Objective 4 p 15

1. “Streambank alteration shall not exceed 25%.” This guideline is arbitrary and inadequately defined. For example, does “loss of vegetation” mean that vegetation is completely lacking on 25% of the streambank, or just that species composition has been altered? Is there any distinction between “loss” of vegetation due to livestock trampling, effects of other animals, or bank erosion and/or deposition? How is streambank defined – low water, bank full or something else – how is streambank vegetation distinguished from other riparian vegetation. Without specifying these factors, this guideline is open to personal interpretation and bias.

2. “Browse (of previous year’s growth) and forage utilization (of current year’s growth) shall not exceed 30% in key areas.” The 30% utilization guideline is arbitrary unless the species and time of measurement are specified, i.e. key forage plants measured at the end of the growing season. This guideline should not be applied to “seasonal use” measured during the growing season. I have never seen utilization guidelines based on last year’s growth for browse. How can you use 30% of last year’s growth without using 100% of current year’s growth?

3. “Reduce undesirable species to low levels (<5%)...” Define an undesirable species – exotic, unpalatable, poisonous? Define <5%. Is it based on density, cover, production?

Comment Excerpt Text:

Page 16 GCNRA Vegetation Action – Objective 5

Kane County fully supports inventory and monitoring as a basis for grazing management. However, we believe that this inventory should be based on identification and mapping of ecological sites and monitoring of trends in species abundance (cover, production or frequency) and ground cover. The objective to “classify and inventory ecological status and successional trend” appears to be based on ecological concepts that have largely been abandoned by current approaches to range evaluation, and we urge that this portion be made consistent with current interagency approaches.

Comment Excerpt Text:

Page 18 GCNRA Wildlife Goal

“Maintain components and processes of natural ecosystems, including the natural abundance, diversity and ecological integrity of the wildlife and fish.” This “goal” consists mainly of nebulous buzz words. The first clause refers to the ecosystem as a whole, and therefore is much broader than a wildlife goal. If the goal is to maintain the “natural” abundance and diversity of wildlife, what does that mean? The abundance of some species of wildlife is probably greater than pre-settlement conditions due to water developments and predator control.

Habitat conditions for many animals have changed due to shrub increases and resulting lower understory cover resulting from lack of fire, grazing and/or weather effects. So what is the “natural abundance and diversity” of wildlife? What does the term “ecological integrity” mean when applied to wildlife and fish?

Page 18 GCNRA Wildlife Objective 2

See comments above.

Comment Excerpt Text:

Page 18 GCNRA Wildlife Objective 3

This objective is meaningless – obviously mammal populations would not be maintained or established where habitat is not suitable.

Page 18 GCNRA Wildlife Objective 4

See comments for Wildlife Goal above.

Comment Excerpt Text:

Alternative A states that “Livestock management actively promotes rangeland health through adaptive management principles and innovative livestock practices.” This statement should be emphasized under all of the alternatives, with the exception of Alternative B, which would remove livestock grazing from the monument.

Comment Excerpt Text:

Page 18 Desirable Conditions... for Objectives 1-5

Wildlife species will not be “subject to grazing”? Wildlife is generally not grazed. Doesn’t this mean that grazing would not occur if “significant impacts occur.”? What if significant positive impacts occur due to grazing for some species due to changes in plant density, cover or species composition?

Comment Excerpt Text:

Page 18 GCNRA Wildlife Objective 7

Strict policies against predator control have sometimes made it difficult to re-introduce or maintain some wildlife populations.

Section 1.2 - Alternative B

Comment Excerpt Text:

“The range of action alternatives will allow the BLM to find a decision that will enable sustained use of the land through improved land health and science-based grazing management. “There appears to be only one alternative that meets the criteria of enabling “sustained use of the land through improved land health and science-based grazing management”. That alternative is to eliminate cattle grazing on all allotments which fail the test of satisfactory or better condition – Alternative B. All of the other alternatives show only a token effort to eliminate the negative environmental impacts of cattle grazing.

Comment Excerpt Text:

As managers of these public lands and resources the only alternatives that seem to meet your mandate are Alternatives A and B. The only alternative to meet your objectives seems to be Alternative B.

Comment Excerpt Text:

With respect to the GSENM, this alternative is unacceptable since it conflicts with the stated policy in the Proclamation. In other words, if the decision has already been made, there is no reason to consider alternatives to it. Therefore, Kane County offers no further comments on this alternative.

Comment Excerpt Text:

Livestock grazing has been important to the local economies for many years and the full discontinuance of the practice would have devastating impacts on the rural areas surrounding the GSENM area. An alternative to consider eliminating livestock grazing would not be a reasonable alternative to further analyze.

Comment Excerpt Text:

Natural balance is the most significant goal because it requires the least amount of costs and man's management (which is usually reactive and insufficient). That should be the goal and is most closely addressed by Alternatives B and C.

Section 1.3 - Alternative C**Comment Excerpt Text:**

A goal that wildlife habitat be protected from cattle

Comment Excerpt Text:

Alternative C should be labeled "Sustainable Grazing Plan".

Comment Excerpt Text:

I believe Alternative C would be improved by allowing the landowner, the public, to participate in grazing management decision making. This Alternative should also contain a process to let grazing allotments be retired from service when the allottee elects to stop grazing. This will reduce the grazing load on Monument lands without causing economic disruption to the local producers, their families and communities.

Comment Excerpt Text:

Finally, Alternative C needs to provide that wildlife habitat will be protected from cattle. I have spent weeks in GSENM over the past few years and have observed cattle damage to wildlife habitat such as in riparian areas. This is not only harms the wildlife (which predate cattle -prior appropriation!) but causes many observers to say that grazing should be banned, rather than better managed, within the Monument.

Comment Excerpt Text:

I urge you to analyze Alternative C and to include ALL of the Sustainable Grazing Alternative proposal.

Comment Excerpt Text:

Please analyze Alternative C and ALL the sustainable grazing alternative proposal for the GSENM.

Comment Excerpt Text:

Offer public tours prior to allotment permit renewal, allotment management plan development, or vegetation projects for conditions impacted by livestock grazing.

Comment Excerpt Text:

All Environmental Assessments (EAs) will provide for public comment on the alternatives and their analyses

Comment Excerpt Text:

When requested by a member of the public, BLM will participate in a preannual permit meeting to discuss problems observed/documentated on a specific allotment the previous year, and proposed solutions to those problems. Such meetings will be available to the permittee and other members of the public.

Comment Excerpt Text:

Encourage the establishment of independent, multistakeholder, consensus collaborations that include representatives of all relevant stakeholders, for purposes of advising BLM on increasing the sustainability of grazing and diverse grazing arrangements on GSENM/GCNRA. The collaborations would be convened or coconvened by non-BLM entities.

Comment Excerpt Text:

Specifically addressing public transparency and engagement through:

- Offering public tours at key times in order to assess the health of the grazing lands and form a basis for scientific analysis.
- Requiring all Environmental Assessments to have public comment on alternatives and the analyses.
- Posting a map and annual plan for each allotment before livestock are allowed on that area each season.
- As requested by a member of the public, BLM will participate in a pre-annual meeting to discuss problems and proposed solutions on specific allotments.
- Encouraging collaborations representing all stakeholders, including those representing native plants and native animals as well as the US population at large--to whom these lands belong--to address issues related to grazing on these lands
- Engaging interested members of the public in on-ground implementation and monitoring of grazing experiments developed by any of a number of the stakeholders.

Comment Excerpt Text:

Better public involvement is also important. Perhaps volunteers could be trained to help monitor land conditions. Tours should be offered to the public that show the differences between over-grazed areas, well-managed grazed areas and areas that have never had grazing would improve the public's understanding.

Comment Excerpt Text:

Important points to consider, in my view, would be public transparency, and the opportunity for public participation in decisions, as well as an opportunity for interested parties to participate in monitoring to assure that these very special lands, which are the property of all Americans, are not degraded.

Comment Excerpt Text:

Offering public tours from time to time and allowing public input, including that from groups advocating for wild animals and plants, would also further these ends

Comment Excerpt Text:

The plan should designate processes for public engagement in decisions regarding how and where livestock grazing occurs within the national monument. The BLM should encourage collaboration among all interested parties, not just the land manager and permittee, to engage in problem-solving. There should be opportunities for collaborative to groups to participate in field reviews, monitoring and evaluation of grazing allotments.

Comment Excerpt Text:

I'd like to see more emphasis on providing for, or taking into account, the needs of native wildlife when it comes to issues like forage, including type of ground cover, and water.

Comment Excerpt Text:

Alt. C does at least provide for ungrazed reference areas, but I see no indication of science related to cows contribution to climate change or changing climate implications for land & waterways.

Comment Excerpt Text:

Where feasible, measures should be taken to protect cultural sites.

Comment Excerpt Text:

Finally, there must be established means for citizens to be informed of grazing management issues and decisions. Grazing management must not be a closed-door process between the agency & permittee.

Comment Excerpt Text:

Furthermore, I expect the BLM to fully analyze the conservation alternative which is reasonable and meets the purpose and need.

Comment Excerpt Text:

native pollinators need to be provided habitat to insure a healthy ecosystem

Comment Excerpt Text:

More diversity in stakeholders who can participate in grazing management decisions, including the public and especially the public

Comment Excerpt Text:

Require protections for all wildlife and wildlife habitat, biological soil crust, endemic and other native plant species, unique and isolated plant communities, pollinators, riparian areas, archaeological sites

Comment Excerpt Text:

Put a very high priority on restoring native plant diversity

Comment Excerpt Text:

Establish a goal that wildlife habitat be protected. This will serve to help protect the BIOLOGICAL, SCIENTIFIC, AND CULTURAL values within the boundaries of the monument.

Comment Excerpt Text:

The EIS should implement policies for effectively managing grazing from a financially-based perspective, one that recognizes the very limited role ranching plays in the current economy of Kane County. Tourism, by far our largest industry, it is currently being negatively impacted by cattle grazing on the Monument.

Comment Excerpt Text:

Alternative C appears to be somewhat restrictive and unfeasible. Implementation of this alternative could slowly close the planning area to grazing.

Comment Excerpt Text:

methods to ensure wildlife habitat is not destroyed either by cattle OR revegetation of cattle forage!

Comment Excerpt Text:

include chapter and verse of the scientific rationale and research for decisions about the entire monument.

Comment Excerpt Text:

Monitor the ecosystem of the Monument constantly

Comment Excerpt Text:

Understand the SCIENCE behind range management with a focus on finding solutions that benefit ALL "stakeholders", not just one group.

Comment Excerpt Text:

Page 43 Wildlife Objective 5

What is meant by natural abundance and diversity of invertebrates? Does anyone know what that was?

Comment Excerpt Text:

Alternative C is not compatible with the requirement in the Proclamation that nothing in the Proclamation shall be deemed to affect existing permits or leases, or levels of livestock grazing and that grazing would be governed by existing laws and regulations. The proposed conversion of large areas to “reference areas”, the proposed conversion of allotments to non-use, and the many proposed “objectives” and actions contained in this alternative that are not consistent with “existing laws and regulations” governing grazing on BLM lands are in violation of the Proclamation. The whole alternative should be thrown out or modified to make it consistent with the Proclamation. The following comments are submitted on the assumption that BLM will keep this alternative in consideration in spite of its inappropriateness.

Comment Excerpt Text:

Page 32 Introductory Statement

This statement does not accurately describe this alternative or how it differs from others. It states that “native species diversity” would be prioritized. In fact, the only difference in this alternative and others with respect to native species is a prohibition on use of non-natives for reseeded. Alternatives A, D, and E also place a priority on native species diversity, but do allow use of non-natives for reseeded where those species are the most effective and economical to achieve resource protection. The use of native and non-native species is addressed in the Utah Guidelines for Livestock Grazing (see Appendix 3, MMP).

Comment Excerpt Text:

Some documents identify Alternative C as a "sustainable alternative" or words to that effect. We have cautioned BLM against arbitrary characterizations of the alternatives and understood that alternatives would only be characterized by letter and a detailed description. We also understood that subjective characterizations were to be avoided. We can understand how the BLM may want to disclose that alternative C was derived from comments submitted by Grand Canyon Trust and other groups similarly opposed grazing. However, we strongly assert characterizing alternatives by subjective phrasing developed by the proponent is inappropriate.

Comment Excerpt Text:

The Sustainable Grazing Alternative includes (at C.17) provides a management action that guides the management of roads used for livestock purposes:

Maintain roads and trails essential for facilitating livestock grazing in a manner that minimizes the effects on landscape hydrology (avoid concentrating overland flow, prevent sediment transport, and minimize compaction to maintain infiltration capacity).

The MMP has provisions, TRANS-15, 16, at pg. 47, for managing transportation routes within the Monument. However, TRANS 15 and 16 do not directly address maintenance of roads for livestock management. More administrative roads are used for livestock grazing purposes than any other use on the Monument. We request inclusion of the Sustainable Grazing Alternative section, “Roads for Livestock Management” (C.17) for the additional clarity it provides to the MMP.

Comment Excerpt Text:**B. Public Participation**

We want to restate our gratitude for providing the public the opportunity to comment on preliminary alternatives. This is exactly the type of action that allows for better and more collaborative decision-making up front to prevent conflicts later. This is also the type of innovative thinking that BLM is looking to institutionalize through its Planning 2.0 process in order to create a more dynamic and efficient planning process.

It is for these same reasons that we proposed the “Public Transparency and Engagement” provisions of the Sustainable Grazing Alternative in section C(1) and C(2), pp. 30-31 of our January 2014 scoping comments. This type of engagement in grazing management will help BLM identify potential issues to be addressed or where improvements in grazed conditions could lead to altered management. It will help generate multi-stakeholder problem-solving for experimental and improved livestock management and more socially balanced use of the Monument. It is obvious, for instance, that many areas within the Monument have lost aesthetic and recreational value through depleted diversity and cover of native plants; fouling of water, denuded areas near water “developments,” and trampling of springs; and unfavorable conditions for pollinators and other wildlife, all of which are of value to diverse users of the Monument.

With increased transparency and multi-stakeholder engagement, BLM will be able to respond in a more dynamic way to the needs of the landscape.

There is nothing that prohibits BLM from having enhanced opportunities for public transparency and engagement in the range of alternatives and such opportunities are highly reasonable. We believe they are also needed, as currently numerous residents and visitors complain that they receive no invitation to join with the BLM and permittees to problem-solve when they report serious resource problems associated with grazing impacts on the Monument. We urge BLM to include sections C.1 and C.2 of the Sustainable Grazing Alternative in Alternative C of the draft EIS.

Comment Excerpt Text:**C. Conservation of Wildlife Habitat**

Goal 6 of the Sustainable Grazing Alternative is drawn from the BLM Fundamentals of Rangeland Health goal for Habitat, which acknowledges that the health of habitat for species of concern is necessarily a goal of livestock management. The Sustainable Grazing Alternative expands on the BLM’s Habitat wildlife goal to include a larger universe of Monument native wildlife species to be considered in livestock management, but any livestock management necessarily must take into account the needs of native wildlife and fish within the Monument, including but not limited to conditions for nesting, brood-rearing, cover from predators, shade, pollination, water quality and quantity, overwintering, food, migrations, and prey.

The scientific literature is rife with research describing implications of varying livestock management for wildlife, for instance for pollinators[8], insect communities[9], birds[10,11], or mammals.[12]

Goal 6 in turn leads to Management Action B 1.4 and 1.5 , which needs also to be included in Alternative C in the Draft EIS. It would seem odd were the BLM to not include livestock management direction for wildlife (and not just those species teetering on extinction) in a Monument grazing plan, given scientific research regarding livestock impacts on wildlife values enumerated in the Monument Proclamation.

Comment Excerpt Text:

The social/economic indicators at Monitoring D-6 in the Sustainable Grazing Alternative are drawn from the Final Report[13] of the Collaborative on Sustainable Grazing.[14] That diverse group felt that just as grass, riparian vegetation, and soil should be monitored on grazed public lands, so should such social/economic indicators as economic opportunities for permittees, opportunities for public participation, and diversity of grazing arrangements.

There does not appear to be any policy or legal reason that BLM cannot include social/economic indicators among elements of livestock monitoring to be tracked.

Comment Excerpt Text:

We agree that the Sustainable Grazing Alternative section on wild ungulates and vegetation treatments (C.9) may be dropped in preliminary Alternative C, as the Monument Management plan already provides for adequate communication with Utah Division of Wildlife Resources and/or Arizona Game and Fish Department for the protection of vegetation treatments and no changes to this portion of the Monument Management Plan are being proposed in any of the preliminary alternatives. If any such changes were proposed in any of the Draft EIS alternatives, Alternative C should state that such changes would not be undertaken.

Comment Excerpt Text:

4. A goal to help reduce global warming by reducing the number of grazing cattle producing methane gas.

Comment Excerpt Text:

I understand that the Grand Canyon Trust and other groups submitted a sustainable grazing alternative for inclusion the EIS. While it appears that portions of that alternative were included in Alternative C, some things were left out. I'd like to request that the BLM include the sustainable grazing alternative in its entirety and analyze it along with the others.

Comment Excerpt Text:

The monument is comprised of public lands and the public has the right be involved in all decisions affecting their lands. The BLM has done a great job of reaching out to the public in the early stages of this process by adding the step of allowing comments on the alternatives they are considering to include in the EIS. I strongly urge the BLM to continue this approach and include opportunities for the public to be involved in any grazing permit processes and to be able to review and comment on annual grazing plans, which is where many decisions that directly impact the land take place.

Comment Excerpt Text:

We have noticed in the wording of Alternative C that it is characterized as the "sustainable alternative" or wording to that effect. As local experienced conservation district officials and land users, we would disagree with this assessment.

Comment Excerpt Text:

I would also like to see a process incorporated into the plan where citizens can participate in decisions about where and how cattle are being grazed on the Monument. By providing comments, gps coordinates, photo documentation, and other observations, the public could help the BLM monitor and protect the Monument.

Comment Excerpt Text:

Natural balance is the most significant goal because it requires the least amount of costs and man's management (which is usually reactive and insufficient). That should be the goal and is most closely addressed by Alternatives B and C.

Comment Excerpt Text:

An Action item proposes the ability to have Independent Monitoring. The state is concerned about the methodology to chose such an independent entity, as it would have to guarantee unbiased analyses.

Section 1.4 - Alternative D**Comment Excerpt Text:**

Alternative D does not represent Garfield County's Plan, Policy or Program. Alternative D is a blended alternative intended to fall somewhere between the No Action alternative and Garfield County's plan, policy and program. Alternative D does not fully represent Garfield County's plan, policy, or program.

Comment Excerpt Text:

2. Garfield County's plan, policy and program calls for maximum sustained livestock grazing use consistent with the FLPMA, the Taylor Grazing Act, and rangeland health standards.

3. Failure to consider a maximum sustainable grazing alternative is inconsistent with Garfield County's plan, policy and program, fails to consider a full range of alternatives; and impacts the counties health, safety, welfare, custom, culture, heritage, and social/economic stability.

Comment Excerpt Text:

Why are collections only addressed in Alternative E? That decision would also apply to Alternative D.

Comment Excerpt Text:

we do not favor the use of State and County ordinances as a basis for designating healthy landscapes that support multiple uses. Given the status of the Monument as a highly significant Federal holding, new and improved Federal practices and standards, along with existing and effective established Federal practices and standards, should be employed to improve grazing management in the future.

Comment Excerpt Text:

We do not believe however, that this Alternative should be characterized as a State and County alternative since portions are not consistent with county or state plans.

Comment Excerpt Text:

We would hope that the format of this plan recognize livestock grazing as a heritage activity that provides an important sense of public and local connectivity to the land.

Comment Excerpt Text:

We also recommended in our scoping comments BLM use past and present tax roll and income information within the same timeframe to demonstrate actual economic trends to assist in the determination the impacts to the community as well to those who still rely on the grazing rights within the Monument to continue making an income from this occupation. Based on these facts we feel that we should give additional input into the management points of this alternative by suggesting modifications in order to add more stability and reliance to continue the cultural and ecological use of grazing in the GSENM.

Comment Excerpt Text:

However, characterizing it as a State and County alternative is somewhat inaccurate. We recognize the input that the State of Utah and local governments had in formulating the alternative; however it should not be characterized as a State and County alternative.

Comment Excerpt Text:

There are also several examples in Alternative D, where clarification of NPS involvement and management guidelines are needed. These include:

P.42 Action states “return any AUMs that have been suspended to active use when range conditions improve”

P.49 Action states “allow permittees to use tractors and four-wheelers in dry washes to access and maintain or repair fences, waterlines, and other infrastructure”

P.50 Action states “fence above ground distinct cultural sites” –this should be determined in partnership with the NPS and only if determined best mitigation, should also consider eliminating grazing if severe impacts are occurring around cultural sites

P.52 Allowable use related to maintaining and enhancing diverse plant communities states “vegetation restoration via methods including mechanical, chemical, biological, and prescribed fires”

P.52 Allowable use “allow a variety of vegetation restoration methods including mechanical, chemical, biological, and prescribed fires”

P.52 Allowable use “allow the use of livestock grazing to control noxious weeds or nonnative, invasive plants”

P.52 Action “develop existing and future grazing resources”

Comment Excerpt Text:

We ask the BLM to address the following concerns specific to Alternative D:

P.56 Clarify what would be re-evaluated and why in the action statement “Re-evaluate Lower Warm Creek allotment based on area available to be grazed”

P.59 Change the following wording to require action to reduce conflicts with recreation rather than suggesting it: “In high use recreation areas where conflicts exist, modify grazing practices such as ...to reduce conflicts”

P. 61 Include specific requirements for the Action “use ungrazed reference areas to help distinguish climate impacts from livestock grazing impact”

P.61 Clarify how damages to streambanks and riparian vegetation will be mitigated with use of water gap fences as an Allowable Use under Water Related Developments

Comment Excerpt Text:

The more sustainable alternative would be Alternative D which would allow more conservation practices and projects to be put within. Monument boundaries thus improving the biodiversity of the landscape for both wildlife and domestic livestock.

Section 1.5 - Alternative E**Comment Excerpt Text:**

Page 55 ALTERNATIVE E

The introductory statement offers no basis for distinguishing this alternative from Alternative D. In fact, there seems to be very little difference. The comments below are intended to identify differences and/or similarities. In short, there seems to be little or no use for Alternative E.

Comment Excerpt Text:

Page 57 Action

This statement outlines the actions taken when an allotment is “voluntarily relinquished.” This statement was not included in either Alternative A or D. It was included in Alternative C, but with different criteria. This would seem to be a case where this topic would conform to “existing laws and regulations” governing grazing allotments on BLM lands. Does every BLM office have the prerogative to alter this policy as they wish?

Comment Excerpt Text:

Page 58-63

Most of the items listed under Alternative E on these pages are not basically different from Alternative D, and this should be stated.

Comment Excerpt Text:

The county understands BLM has contracted with a consultant to assist in developing five alternatives for this project. We believe Alternative E, the blended alternative, unjustifiably limits the analysis, at this point in the process. We request that Alternative E be replaced with a maximum grazing alternative. It is our understanding that as part of the final EIS BLM may choose to develop a blended alternative from actions that were analyzed in the full range of alternatives. It is premature, arbitrary and capricious to develop the blended alternative prior to conducting the detailed environmental impact analysis.

Comment Excerpt Text:

While Alternative E is an improvement over current management, it still places undue importance on livestock grazing, allows grazing on too many acres of the monument (more than 90 percent), aggressive management actions to support grazing (tearing up piñon-juniper forests to increase forage), allows planting non-native plants, and the use of herbicides. In addition, utilization of forage by livestock (60 percent) is too high for the arid Southwest, as shown by numerous studies. It is critically important that the EIS carefully examine utilization rates and justify the choice that is included in the livestock grazing plan.

Comment Excerpt Text:

For Alternative E, there are discrepancies between the Summary Comparison tables and the Draft Alternatives document descriptions identifying which GCNRA allotments would be unavailable. The Summary Comparison tables indicate 109,900 acres unavailable in Harvey’s Fear, Navajo Bench, Spencer Bench, Escalante River, Lake, and Fortymile Ridge. However, the document text on P.57 indicates that Escalante River, Harvey’s Fear, Navajo Bench, Rock Creek-Mudholes, and Spencer Bench would be maintained as unavailable, while the following areas would be managed as unavailable: Lake, Lower Warm Creek, and unallotted areas in GCNRA. The discrepancy is that the document text on P.57 includes Rock Creek Mudholes and Lower Warm Creek as unavailable, however those allotments are not included on the Summary Comparison tables as unavailable. In addition, the

document text on P.57 does not include Fortymile Ridge as unavailable, however it is included in the Summary Documents as unavailable.

Comment Excerpt Text:

We recommend that the following language from Alternative C be brought into Alternative E. Inserting the following actions will significantly strengthen and improve the preferred alternative:

- (on p. 36 of Alternative C) “Action: In GSENM and Glen Canyon NRA institute light utilization (25%), both for riparian and upland areas. Implement one pasture a year in each allotment until all pastures have a light utilization limit.”
- (on p. 37 of Alternative C) “Action: Allotment Action Plans. When monitoring of indicators shows a GSENM or Glen Canyon NRA allotment or pasture is failing to meet or move towards Objectives, action plans will be drawn up for meeting or moving towards Objectives. Unless explicitly experimental, with appropriate controls and monitoring of outcomes assured, action plans must be based on evidence that the proposed activities or management have resulted in movement within reasonable time frames toward the particular Objectives in other settings and must include methods for measuring whether conditions are improving under the action plan.”
- (on p. 37 of Alternative C, regarding multiple actions to protect biological soil crust) Action(s) : “Whenever possible, avoid constructing range improvements (e.g. water developments) in areas with high percentage cover of biological soil crust or high biodiversity conservation value (e.g. gypsiferous soils)...Where needed, relocate existing water developments to areas with low potential for biological soil crust development....Avoid placing salts or supplements in areas with high percentage cover of biological soil crust...Reduce grazing impacts to crust:
 - In general, light to moderate stocking in early- to mid-wet season is recommended on biological soil crust.
 - Use brush barriers to divert livestock trailing through sites with biological soil crust.
 - Crusts will be considered recovered when they are at 80% of their potential cover. If crust cover drops below this level, and livestock are the cause, AUMs will be reduced by 25% until crust recovers again.
- (on p. 38 of Alternative C) “Action: Monitoring. Within 1 year of the Record of Decision, BLM will designate, with interested public/permittee input, the methods BLM will use to monitor Indicators that Objectives are being met. BLM monitoring methods will include methods used to measure:
 - Meeting or moving toward Objectives
 - Existing long-term trend transects within GSENM and Glen Canyon NRA
 - Interpreting Indicators of Rangeland Health points or transects
 - Proper Functioning Condition assessment points or stream reaches
 - Assessment, Inventorying, and Monitoring points
 - Effectiveness of treatments at reaching both project and Monument-wide objectives
 - Any other methods used systematically by the BLM within GSENM or Glen Canyon NRA”

- (on p. 38 of Alternative C) “Action: In GSENM and Glen Canyon NRA institute light utilization (30%), both for riparian and upland areas. Implement this utilization rate in one pasture per year in each allotment until utilization in all pastures is light.”

Section 1.6 - New**Comment Excerpt Text:**

I think it would be important to have a "buffer zone" around the main Escalante canyon and side canyons.

Comment Excerpt Text:

It seems to me that there is no "middle ground alternative" that seeks to balance grazing with conservation. Alternative B would allow grazing on approximately 67,000 acres. The next closest alternative for acreage is almost 2 million acres! Perhaps you missed an opportunity to find a middle ground that balances grazing and conservation. I would like to see another alternative added to the choices- with grazing acreage around one million acres.

Comment Excerpt Text:

Please prioritize native species and establish a process for allotments to become free of cattle when permittees retire their permits.

Comment Excerpt Text:

Slow progression back to a more natural and primitive state.

Comment Excerpt Text:

I prefer an alternative not considered above. Establish a value of the grazing permits and buy the existing permits. Close the Glen Canyon NRA. Eliminate grazing on the GSENM for a period of 15-20 years. Maintain existing water developments for wildlife. Monitor the area annually for vegetation, soil erosion, wildlife, recreation, etc.

If after the closed period grazing with cattle is doable, restock with appropriate season and numbers on a ten-year bid basis permit. Permittees must be local ranchers within a specific dependent property (owned) area.

Comment Excerpt Text:

After reading the alternatives I feel that none of them meet all the needs. I would like to see an alternative where we are able to sustain AUMs or even up them if possible.

Comment Excerpt Text:

Managed, rotational grazing is also known to improve rangeland.

Comment Excerpt Text:

The Proclamation when the monument was established specified that the same level of grazing would remain. I think you should honor that.

Comment Excerpt Text:

There's no mention of the possibility of reconfiguring allotments on the monument, of taking a step back and asking about how well this current "map" of public grazing on the monument has served the greater good.

Comment Excerpt Text:

Accordingly, I respectfully suggest that the so-called “conservation alternative” (Alternative C) may not be sufficient to adequately restore lands which have suffered past abuse. I urge you to develop another alternative that will, among other things,

1. Permit allotments that are retired from grazing through nonuse or negotiated buyouts to be permanently retired.
2. Bring stocking rates within levels that are determined to substantially improve range health, not merely perpetuate inadequate baseline levels of forage conditions and other environmental parameters.
3. Give absolute priority to maintaining and improving native wildlife habitat, native grasses and forbs, preservation and re-establishment of biological soil crusts, maintenance of untrampled streambanks and water sources, and reducing soil loss.
4. Identify areas which must be reserved from grazing to achieve the above conditions.
5. In areas that remain open to grazing, reduce forage utilization levels to 25 percent of available forage, in line with scientific studies showing this to be necessary for improvement of soil conditions and wildlife habitat.
6. Institute actions to keep cattle away from known archaeological sites, especially those within natural rock shelters.
7. Attach enforceable conditions to grazing permits to ensure compliance.
8. Initiate comprehensive, monument-wide monitoring of allotment conditions, including identification and immediate removal of trespassing cattle. Horses, not ATVs, should be employed for such operations.

Comment Excerpt Text:

There is not an alternative to increase grazing

Comment Excerpt Text:

At least one alternative should consider all areas of the Monument open for livestock grazing. It seems there are some areas of the Monument that are not being considered for livestock grazing under any alternative. Unless there is a statutory prohibition of livestock grazing in those areas, a reasonable range of alternatives must include them somewhere in the analysis.

Comment Excerpt Text:

Garfield County asserts the BLM is required to evaluate a full range of reasonable alternatives. The BLM's draft alternatives consider reduced grazing to an extreme (although it may not be legally implementable). However, the draft alternatives do not consider increases grazing at corresponding levels. Alternative B describes the minimum possible grazing. BLM should also include an alternative- preferably E - that is a maximum reasonable alternative. Rough calculations using numbers provided by Monument staff indicate restoring Pinyon/Juniper encroachments that do not meet ecologic site descriptions and reasonably increasing neglected forage capacity could result in a doubling of AUMs that were authorized when the Monument was created. We specifically request that a maximum grazing alternative be considered to fulfill reasonable range of alternative requirements. We also assert that just because an alternative requires significant effort it should not be eliminated from analysis, especially when alternatives on the opposite end of the spectrum, that may actually be illegal, are being considered. We believe that the limits on both ends should be considered and a maximum grazing alternative must be analyzed.

Comment Excerpt Text:

We also would like to acknowledge that the BLM in its development of Preliminary Alternatives failed to include a true range of alternatives. There is no alternative included that would immediately and significantly reduce destructive or conflicting livestock grazing on the Monument. While Alternatives C and E have the potential to reduce AUMs they do not include measures to immediately exclude grazing from large portions (acres) of the landscape.

Comment Excerpt Text:

The differences between Alternative A, D and E are simply not significant enough to warrant three different Alternatives. The BLM would better serve the public with at least one alternative that provides the reductions the public has been seeking since pre-Monument designation times.

Comment Excerpt Text:

The archaeological remains of three cultures (Fremont, Kayenta Anasazi, and Virgin Anasazi) are found in the monument, making it particularly important region. The EIS should ensure that these irreplaceable resources are adequately protected by including specific proposed actions for addressing the following unacceptable impacts:

Rock shelters where cattle tend to congregate for shade and protection from the elements can contain complex sites with features and perishable items. They often have subsurface deposits. Cattle can quickly damage this type of site through trampling, and crushing. Their urine and feces can destroy artifacts, especially perishable items. There have been instances where cattle dung has sprayed on top of rock art sites as well.

Standing architecture (historic and prehistoric) can also be affected. This is especially true for fragile standing walls where cattle can lean against or rub against. This same type of thing has been known to occur at pictograph sites in rock shelters. In one case, hair was embedded on the surface of lower lying rock art panels.

Open sites with artifacts or surface features, especially where cattle congregate (like around a spring, corral, or trough) can get trampling of features and artifacts as well as erosion from the area being denuded of vegetation. Once that occurs, sediment can wash or blow away, causing displacement of artifacts and features. Sites can also be damaged by wallowing where the cows create a bed for themselves. Cattle trails across sites can also lead to unacceptable erosion and damage.

Comment Excerpt Text:

Not all areas or anywhere close to 95% of the area should have grazing. A top priority in any grazing plan or plan for the Monument should be a mechanism that would allow a higher (much higher) percentage of the monuments land not to be grazed.

Comment Excerpt Text:

If you have not already done so, you should consider directly addressing the need for additional or monument-specific regulations to do so within this EIS process.

Comment Excerpt Text:

Consider opening Spencer Bench for a short period of time as the land permits, according to appropriate stewardship and use.

Comment Excerpt Text:

The range that was potentially limited was on the up side or increasing the GSENM grazing resource. A couple of alternatives limited grazing to zero or to such low levels that grazing would be effectively infeasible. I strongly

suggest that there be a maximum grazing alternative where 100% of the monument is grazed sustainably at a maximum number of grazing animals matched to the available forage resource and not limited by permit numbers. Adaptive management could be used to accomplish this alternative. Also, grazing management techniques such as herding, water distribution and/or high intensive short duration grazing management systems could be used to accomplish this without negatively affecting the monument objects and values. A maximized grazing resource would require substantial vegetation restoration activities and active vegetation treatment and management. Adaptive management would also be key in this scenario as precipitation patterns vary significantly from year to year and may require ranchers and range managers to make significant changes from year to year.

Comment Excerpt Text:

We have also noticed that if there is extreme consideration by the BLM to drastically remove grazing from the monument through some of these alternatives, there needs to be consideration on the other end of the spectrum to increase grazing AUMs where warranted through resource improvements, monitoring and Best Management Practice (BMP)s through wise grazing management practices and standards.

Comment Excerpt Text:

We know for a fact that managing encroaching Pinyon/Juniper forests that do not meet the ecological site descriptions and restoring those lands to what they used to be such as grass and shrub lands could warrant developing alternatives that could raise grazing AUMs while improving watershed health and sustainability.

Comment Excerpt Text:

Therefore, the state, and the counties affected, requested the BLM include an Enhanced Grazing Alternative. Unfortunately, the BLM, in this case, appears to respond solely to political messages, rather than fully meeting the objectives of NEPA.

Comment Excerpt Text:

The elimination of the Enhanced Grazing Alternative in the EIS is a violation of the requirements of NEPA and provisions outlined in judicial case law. The Enhanced Grazing Alternative was developed during the course of a Cooperating Agency meeting alongside several other alternatives, some of which have apparently emerged as Preliminary Alternatives for this process. The participating Cooperating Agencies created the Enhanced Grazing Alternative to complement the grazing reduction management scenarios with a viable grazing management scenario. In addition, the decision to eliminate this alternative was made prior to finalizing the forage calculations in the Monument. In other words, BLM's action was made before receiving the data which determined how many AUMs are available in the planning area.

Comment Excerpt Text:

BLM's actions ignore NEPA procedure in favor of pre-determined opinions on the outcome of this planning process. Summarily removing the proposed Enhanced Grazing Alternative provides a politically-driven range of possible management decisions and improperly skews the range towards a reduction of livestock grazing in the Monument. The state strongly recommends the Enhanced Grazing Alternative be reinstated to fully represent a reasonable range of alternatives and provide for an examination of economic and environmental costs and benefits to resources within the Monument.

Comment Excerpt Text:

the state requests the BLM consider that an alternative approach to maintaining rangeland health in the Monument is to move most AUMs into winter seasonal use, which has not yet been discussed or presented in any Alternative.

Section 1.7 - Combination of Alternatives

Comment Excerpt Text:

Structural Improvements – Water GCRA The provisions under Alt A and Alt C both appear to be reasonable and should be combined.

SECTION 2 - LIVESTOCK GRAZING - GENERAL

Comment Excerpt Text:

Provision should be made for allotments to become free of cattle if permittees relinquish or retire their permits.

Comment Excerpt Text:

I am in favor of legalizing PERMANENT permit buyouts.

Comment Excerpt Text:

The cultural and historical importance of grazing needs to be recognized.

Comment Excerpt Text:

Environmentally sensitive areas and those with unique characteristics or special value for their flora and fauna, scenic views and for outdoor activity should be left permanently un-grazed.

Comment Excerpt Text:

We need to be able to have the opportunity to limit grazing here in the short term and in the long run, remove cows from the sensitive riparian ecosystem.

Comment Excerpt Text:

Kane County supports the options listed in order of priority. Two points should be made clear. One is that it is not the prerogative of the permittee relinquishing the permit to decide or influence how the permit should be reassigned.

Second, the concept of “allocating” the forage to another use is an obsolete term leading to abuse and arbitrary, unscientific decisions, and it should have been abandoned by BLM years ago. This term makes it appear that BLM is just “dividing the pie” among various uses. Under multiple use, tradeoffs between various uses, including livestock grazing, are necessary, but to make it appear that they are just dividing the pie of forage is completely misleading and lacks any scientific basis. For example, how do you “allocate” AUMs to recreation; campers don’t eat grass. Even when considering wildlife, there is no direct connection between AUMs of forage available for livestock and the food or cover requirements for any species of wildlife, unless the forage preferences and grazing distribution of that species are identical to domestic livestock. This term should be removed from any place it occurs in this document. The real meaning is “to give preference to another use where there are conflicts with livestock grazing.”

Comment Excerpt Text:

create a system of large and varied reference areas across the GSENM wherein grazed and ungrazed landscapes can be studied and evaluated. This can most easily be brought about by allowing allotments to be retired by voluntary permittees. Secure fencing and cattle exclusion will create valuable study sites.

Comment Excerpt Text:

Grazing exclosures are essential in order to determine the positive or negative effects of grazing. Without this baseline of what the land health is like without grazing, it is difficult to gauge the effectiveness of land management decisions.

Comment Excerpt Text:

Proposed relinquishment language in all of the alternatives appears to be standardized. Garfield County opposes relinquishments that will terminate AUMs. We assert Proclamation language and federal law requires that they be reissued to a willing permittee. We ask that relinquishment provisions providing for the reissuance of livestock grazing be included in the appropriate alternatives and be considered a preferred option.

Comment Excerpt Text:

Please provide a public comment period on future grazing decisions with an option for relinquished land to be removed from grazing, not just re-assigned.

Comment Excerpt Text:

It seems to me that livestock grazing should be considered only after the various ecosystems are fully functional again.

Comment Excerpt Text:

It is not clear how the BLM determined which allotments to close and which would remain open within the NRA in the various alternatives. There is no indication that an accurate assessment of rangeland health along with an assessment of impacts to the values and purposes from livestock grazing within GCNRA were incorporated into developing the alternatives. In our scoping comments, we stated that the BLM needs to ensure that currently grazed allotments within GCNRA are meeting grazing standards and not damaging or impairing NRA values, purpose and resources. In order to determine this, the BLM, in partnership with the NPS, needs to analyze all relevant data for the current condition of open allotments inside GCNRA. NPCA urges the BLM to ensure that scientifically based decisions are made in terms of where grazing is appropriate inside the NRA and how permits will be managed and monitored in partnership with the NPS for the protection and preservation of NRA values and purposes. We ask the BLM to clarify the decision making process for identifying specific allotments within GCNRA as open or closed in the various draft alternatives.

Comment Excerpt Text:

Alternatives A, D, and E have some potential but also many flaws, such as: (1) Giving preference to recreation over grazing in front country zones; and (2) excluding riparian and other areas for grazing consideration in the evaluation process. All ideas should be on the table; and (3) your solution on voluntary relinquishment includes all proposed alternatives which is unacceptable because of the last action point, "amend or revise the land use plan to allocate forage to uses other than livestock grazing," which is arbitrary and vague.

Comment Excerpt Text:

Grazing also needs to be monitored with quantitative thresholds that decrease grazing in areas that do not meet standards.

Comment Excerpt Text:

Close riparian (live water) areas such as Paria Canyon, Hackberry, Last Chance, Willis Creet, etc., from any grazing. Flowing water is a rarity that needs protection on the Monument and surrounding area.

Comment Excerpt Text:

We as conservation districts are very concerned that the BLM has spent a significant effort in identifying alternatives that further reduce grazing numbers from those that existed before the Monument was created in 1996. Those kinds of policies on Monument lands are inconsistent with federal law, the original Monument

proclamation, Utah State law, local county land use plans and the conservation district county resource assessment.

Comment Excerpt Text:

The BLM must include in each RMP alternative and in the final selected alternative a voluntary waiver and retirement provision for all grazing permits.

Comment Excerpt Text:

It is imperative that BLM, in its MMP amendment, recognize the value of ungrazed watersheds both from an economic and environmental point of view. Not all areas should be grazed by livestock. This should be based on a determination of suitability for livestock grazing considering alternative uses and their benefits as well as the current condition of the land. In addition, sensitive soils must be protected. This includes soils which occur on steep slopes, are susceptible to severe wind and water erosion or have been degraded from their potential by removal of ground covering vegetation and cryptogamic crusts. It also means that in areas of weed infestations, generally caused as a result of livestock grazing, livestock should be eliminated to allow recovery. Unsuitable areas should be mapped and allotments in those areas phased out to provide necessary protections. Those areas that are to continue being grazed by livestock must be stocked and managed in accordance with the condition of the land and its vegetation.

Comment Excerpt Text:

The preferred alternative does not take advantage of the management possibilities for voluntary relinquishments. As written, retiring relinquished allotments is only one of a list of options for reallocating AUMs (page 42). In an NLCS unit, reassigning AUMs to resource protection or research should be the primary goal of voluntary relinquishments and the preferred alternative should reflect that.

Comment Excerpt Text:

From my perspective there are allotments which should be discontinued because of the abuse, and the allotment not being suitable for grazing. Several examples are the ones in LAST CHANCE, WARM CREEK, AND SMOKEY MOUNTAIN CANYONS, AND HOUSE ROCK CANYON on Buckskin Mountain.

Section 2.1 - Alternative A

Comment Excerpt Text:

“Manage the following areas as unavailable for livestock grazing.” Kane County’s position is that some or all of these areas should be available or potentially available for livestock grazing unless physical conditions and/or unavoidable conflicts with multiple use objectives precludes it.

Comment Excerpt Text:

The first four Action items are unnecessary. It is sufficient to say that adaptive management will be used in management of all allotments.

Comment Excerpt Text:

The seven action items starting at the bottom of page 24 and continuing on to page 25 all relate to closure of allotments or continuation of unallotted status. As previously stated, Kane County takes the position that the level of grazing on these areas should be evaluated on a case by case basis and should only be reduced or eliminated where physical conditions and/or unavoidable significant conflicts with other multiple uses occurs. Decisions made in the MFPs cited should be re-evaluated in terms of current conditions.

Comment Excerpt Text:

Page 26 Action

““Monitoring will be established...” Was this action accomplished? If so, the action should be to continue to monitor. If not, maybe there should be some explanation why.

Section 2.2 - Alternative B**Comment Excerpt Text:**

Action Statement for Alt B.

The Department of Interior considers grazing a permitted use and not a guaranteed right. However, the National Park Service often buys grazing permits at their market value, such as Capitol Reef National Park where these purchases have occurred since mid-1980s. We suggest the compensation for value of grazing permits and for range improvements paid for exclusively by a permittee be investigated and if compensation is possible, an Action Statement be written explaining the potential of compensation. If compensation is legal, it might also be used for any voluntary relinquishment of grazing rights as discussed in other Alternatives.

Section 2.3 - Alternative C**Comment Excerpt Text:**

A process to allow allotments to become free of cattle if permittees relinquish or retire their permit.

Comment Excerpt Text:

Alternative C should be strengthened by reinserting the provision that grazing permits be allowed to be retired or voluntarily given up.

Comment Excerpt Text:

Please imitate the NRA in the way they've stopped the cow abuse.

Comment Excerpt Text:

I ask that a provision that would allow allotments to become cattle free over time.

Comment Excerpt Text:

Please include all the aspects of the Sustainable Grazing Alternative, especially the provisions for voluntary retirement of allotments and control of invasive species by permittees. Please see the attached sheets for specifics and add the wording in grey highlights to alternative C.

Comment Excerpt Text:

Voluntary retirements and criteria should be applied to any additional areas identified as unavailable for cattle.

Comment Excerpt Text:

A map and annual plan of use for each allotment (with pastures) will be posted prior to livestock seasonal entry on the allotment.

Comment Excerpt Text:

I favor Alternative C with a few modifications. Grazing allotments should be retired when possible or rested to allow for natural recovery. I encourage the BLM to manage the GSENM for all users and not just maximized grazing. New studies show that the actual forage available does not support current levels of grazing. Wildlife is now competing with cattle for forage, water and space.

Comment Excerpt Text:

There needs to be a way to retire allotments so that those who have them today or acquire them tomorrow can choose to serve the land rather than themselves.

Comment Excerpt Text:

The status of allotments as "available" or "unavailable" should be fluid, changing as range conditions, climate and the condition of natural resources change over time.

Comment Excerpt Text:

Make designation of allotments as available or unavailable provisional based on adaptive management.

Comment Excerpt Text:

I think Alternative C should include a path towards reducing the grazing in GSENM and Glen Canyon NRA by means such as permittee retiring their use if the permittee chooses to not renew.

Comment Excerpt Text:

The area livestock industry has traditionally relied on these lands for winter grazing. The impact to livestock production of reducing grazing and changing management practice is almost insignificant to the overall industry but the impact to the particular ranchers who operate in the Monument is significant. This alternative provides a two year notice for the changes proposed and compensation for improvements which are likely minimal. There are no reasonable alternatives for the local ranchers other than reduction of herds. Is there any potential for one time compensation to offset the immediate losses?

Comment Excerpt Text:

Un-grazed (fenced-off) permanent reference plots need to be established in all habitats to be able to compare habitat quality (including species diversity) between grazed and un-grazed lands. This is the only mean by which sustainability can be judged. I have personally observed substantial differences in the few fenced-off plots in the Gentry Mountains, specifically aspen recovery.

Comment Excerpt Text:

Monitoring of these plots by qualified scientists needs to be included in the plan.

Comment Excerpt Text:

Livestock exclosures should be established in all representative plant communities across the national monument to allow monitoring of grazing impacts. The BLM should make a commitment to collect data annually from these exclosures to monitor and evaluate impacts and to separate livestock grazing impact from climate change.

Comment Excerpt Text:

BLM should commit to resting grazing allotments every third year to allow for native plant species recovery. The grazing management plan should establish measurable standards for the amount of habitat degradation that is allowed to occur from livestock grazing.

Comment Excerpt Text:

Also, I think it very important that allotments be permanently retired as that becomes possible.

Comment Excerpt Text:

The only way to improve these conditions is to use the best available science to survey, gather data, monitor and manage domestic livestock grazing.

Comment Excerpt Text:

Large and small exclosures should be maintained to compare grazed and ungrazed area to determine the true impact of grazing.

Comment Excerpt Text:

- More diversity in sustainable grazing arrangements

Comment Excerpt Text:

Find a balance between the percentage of land which is grazed and ungrazed, in the extent to which that land is grazed, and in the length of time each area may be grazed

Comment Excerpt Text:

there are several area where grazing should be ended due to extreme degradation of the resource or conflict with recreation. These are:

- Dry Fork Coyote Gulch
- Willow Gulch
- 50 Mile Gulch
- Davis Gulch
- The area east of the Dry Fork out to the Escalante River – including the Scorpion area, and Les George Point.

Comment Excerpt Text:

The Dry Fork of Coyote has been beaten nearly to death, to the point where there is little left but tumbleweeds and cheatgrass on the alluvial terraces. Evidence of how it should look can be found in the upper reaches of one of the side canyons where a rockfall has kept cows out for a long time, and it is incredibly lush with all of the native species that belong there, in stark contrast to the area below the rockfall and the rest of the Dry Fork.

Comment Excerpt Text:

Willow, 50 Mile, and Davis Gulches are far more valuable for their recreational values. Keeping cows out of Willow will not be an easy thing, but it could be done with fencing across several gaps that allow access in order to avoid having another fence across a narrow flood prone stream channel. Even if such a fence were to be built, the only place where it would be feasible is too far downstream to be meaningful, and too much of the upper reaches of the canyon would remain open. A rockfall may prevent access down the main south branch of the canyon and avoid the need for a fence there. 50 Mile could be closed with a fence across the channel, keeping in mind that it will be subject to flooding and will have to be maintained. Davis Gulch can just be left alone. It is doubtful that any cattle will find their way down the slickrock trail into the canyon on their own.

Comment Excerpt Text:

The area east of the Dry Fork has so little forage or water in all the sand and slickrock that it seems pointless to put cows out there. When they are there the damage they do to the small sandy pockets that support a bit of grass is appalling. Besides that there is just too little water. I once found where four cows had died trying to find

their way down into Scorpion Gulch in a desperate attempt to get to water. They obviously did not know about the sand dune at the head of the canyon. Two of them fell and were killed and the other two apparently just gave up and died right above where the first two had fallen. Apparently their owners were not monitoring conditions out there and looking out for their property.

Comment Excerpt Text:

Plan C should include the phasing out of current grazing permits. When a permit holder no longer is actively using the permit, it should not be renewed, transferred, or reissued. The longterm goal should be to phase out all grazing in these areas.

Comment Excerpt Text:

Protect natural water resources, riparian areas, archaeological sites, tribal interests and religious concerns, all the elements of the landscape that provide the awe inspiring, jaw dropping beauty of all these areas.

Comment Excerpt Text:

Reference and Recovery Reference Areas as defined on page 39 are excellent tools for monitoring the benefits or impacts of grazing over time. Strengthen this discussion by inserting in the proper place a requirement for maintenance of the enclosures, cages, fencing associated with the reference area. State who will do the construction, maintenance and how often the structures will be monitored to ensure they are functional. Ten (10) years and the other wording in the 3rd bullet on top of Page 39 seem to be good standards but we are not certain if those standards are sufficiently explicit.

Comment Excerpt Text:

Page 35 Action

The proposal to convert allotments to non-use when “voluntarily relinquished or otherwise retired” is not acceptable. The general policy for the GSENM already establishes that grazing management will take into consideration the protection of resource values and conflicts with other uses. In the vast majority of cases these objectives can be reached by appropriate adaptive management and do not require that an entire allotment be closed to grazing. This provision will no doubt result in closure of allotments that will have a negative impact on the economy of Kane County. If a permittee voluntarily relinquishes his or her permit, it should be offered to another individual who will graze livestock on it, otherwise we are allowing individuals to decide grazing policy for GSENM. It is not certain what “otherwise retired” means, but presumably it refers to an involuntary relinquishment of a permit?

Comment Excerpt Text:

Page 38 Actions

The two action items that deal with “voluntary relinquishment” of permits or partial use should be removed. These are only efforts to reduce stocking. It is not the prerogative of a permittee to individually decide to remove livestock or reduce stocking – i.e. to set government grazing policy. Such reductions result in significant economic impact to Kane County and therefore, Kane County must be involved in any such proposed decision. Allotments should not be converted to non-use or partial use unless resource conditions or unavoidable conflicts with other uses make such actions necessary.

Comment Excerpt Text:

Page 38 Action

“Monitoring” The Utah Standards and Guidelines (MMP, App 3) already state the need to monitor grazing allotments and it is not necessary to do more than quote that statement.

Comment Excerpt Text:

Page 39 Action

“Utilization cages.” This action requires that utilization cages will be in place for a years in order to measure utilization “in order to depict expected production.” This statement defies understanding. By definition, utilization is the percentage of the current year’s growth utilized by herbivores. To measure or estimate utilization requires an estimate of the current year’s production and an estimate of the amount removed or remaining. Current year’s production can only be measured after the end of the growing season. If a cage is used to aid in estimating total production without grazing, it should be left in place from before the growing season starts until the end of the growing season. In fact, the most common use of cages is to provide a basis for measuring ungrazed heights of plants rather than production since it is not feasible to put out enough cages to adequately measure production.

There is always some question whether the growth observed in cages is the same as would have occurred without the cage. Numerous studies have shown that cages have some effect on plant growth, usually positive, which may result in over estimation of actual utilization. Leaving cages in place for two or more growing seasons would greatly complicate the interpretation of production data, since it would be more difficult to separate current from previous year’s growth and any cage effect on growth would be increased. Whoever proposed this action either has no understanding of measurement of utilization or wishes to bias the measurement in some way.

Comment Excerpt Text:

Page 39 Action

“80 percent” There is no basis for the 80% figure and the idea that comparison with so called “reference areas” would provide the basis for all management decisions is contrary to the concept of adaptive management and trend monitoring on a site specific basis.

Comment Excerpt Text:

Page 39 Action

“Independent Monitoring” This action should be combined with the action item on p38 where it calls for development of a monitoring plan by BLM with input from interested parties. Any monitoring should be consistent with that plan (time, place and methods used) and BLM should coordinate any monitoring done on GSENM. Almost all monitoring involves selection of the location, time, and method to be used, rather than a complete inventory or random sampling procedure. Therefore, the collection and interpretation of monitoring data can be biased if there is not agreement among interested parties in advance on how it will be done and interpreted. If BLM fails to lead in this process, it will fuel controversy and litigation rather than problem solving.

Comment Excerpt Text:

Lastly, the multiple use concept implies that values such as wildlife habitat and retention of harmful dust (i.e. protection of biocrust) should be incorporated in any plan; it is only reasonable to have at least 50% free of cattle.

Comment Excerpt Text:

Secondly, the reference areas could become a valuable source of seed from locally adapted native plants with which to help restore other areas from which these species have been lost. The seeds might be actively collected and sown for this reason, but the reference areas themselves would also be expected to naturally seed adjacent rangelands.

Comment Excerpt Text:**A. Availability and Unavailability for Livestock Use.**

At the core of the Sustainable Grazing Alternative is an innovative but not unprecedented approach to making lands unavailable or available to livestock grazing in BLM land use planning. In fact, we have pointed out several planning decisions where BLM has used an adaptive management approach to grazing in land use planning rather than the available/unavailable dichotomy that leads to more rigid and static management. These examples include:

- i. Upper Deschutes RMP, OR (2005): allows for grazing permit retirement via a “grazing matrix” (at page 80) which allows for adaptive management in light of opportunities (which may change over time) and allotment conditions. The matrix is further discussed in the appendices and the full document is available online (BLM 2005b). The Clarno Allotment and the Lynch Allotment have been retired in recent years using the matrix (personal communication, Oregon Natural Desert Association).
- ii. Carrizo Plain National Monument RMP, CA (2010): BLM set out the following three categories: (1) “Available for livestock grazing,” (2) “Available for livestock grazing, but only for the purpose of vegetation management,” and (3) “Unavailable for any livestock grazing,” (at II-56), showing that BLM can and should utilize a range of options beyond just available/unavailable for livestock grazing in planning in order to achieve the most appropriate management regime for the planning area.
- iii. Pinedale RMP (2008): created three types of areas for oil and gas leasing: Intensively Developed Fields, Traditional Leasing Areas and Unavailable Areas. Traditional Leasing Areas can be converted to Intensively Developed Fields when certain criteria are met without having to engage in a plan amendment process. Although not related to grazing, this shows a parallel example for an adaptive management approach regarding allowable uses in a land use plan.

We believe that using the adaptive management approach as set out in the Sustainable Grazing Alternative will help alleviate some concerns with the status quo approach to grazing management where the expectation is that grazing will occur so long as lands are “available”, while also addressing concerns about vast amounts of lands being “closed” or made unavailable. This is a reasonable alternative for grazing that should be included in Alternative C for consideration. Also, as discussed in the section below, this type of innovative thinking and management is within BLM’s legal discretion and is encouraged by BLM policy.

Comment Excerpt Text:

Suspended use areas and closed areas, included in the Sustainable Grazing Alternative, were not included as a provision in preliminary Alternative C.

Some closed areas are required for the establishment of long term reference areas for comparison with grazed lands, to protect certain wildlife habitat or cultural resources; and to reduce cattle and recreation conflicts.

As well, in D.1.2.1, the Sustainable Grazing Alternative identifies as “closed”, those “Areas closed to livestock grazing via a Record of Decision supported by NEPA analysis and documentation.”

“Closed” is a different designation and definition than unavailable within the Sustainable Grazing A. This was also recognized by the Collaborative on Sustainable Grazing when it listed “closed” as distinct from “non-use” in its recommended list of “diverse grazing arrangements”[15]

It is acceptable that non-use areas would be termed non-use because it identifies a designation of the AUMs rather than an area on the landscape.

Comment Excerpt Text:

Reference areas: Ungrazed areas are vital for understanding the impacts of grazing. I have an intimate understanding of areas that were never grazed, stopped being grazed a long time ago, stopped being grazed recently and still are grazed. Soil type makes a huge difference in recovery from grazing. Eolian areas recover faster. Alluvial soils less so and Clay based soils the least. Wetter years have a better effect. The alluvial soils become weedy with tumbleweeds and ragweed thus take longer to recover. Riparian canyon bottoms can recover quickly and begin to accumulate sediments as soon as grazing is stopped.

- The bench under Egypt between 25-mile and Harris Wash was retired in 1993 and has gone from shrubs Sand Sage etc. to mainly grass. Each year seems to build up the grassland.
- Big Bowns Bench was retired around 8(?) years ago and is slowly improving in the eolian areas but not so much in the Kayenta soils. The brush is being crowded by grasses and Bighorn Sheep have moved into the Cliff Spring area on the South end and along the river cliffs. This bench should remain ungrazed and used as a reference.
- Retiring Little Bowns, Wolverine and King Bench would tie in with Rattlesnake and Steep Creek Benches to create a corridor from Egypt to Boulder Mountain.
- Brigham Tea Bench was rested for two seasons and the grass in the eolian areas increased nicely and illustrates the beneficial aspects of interrupted grazing.
- The bench between Sand Hollow and The Gulch is severely overgrazed and looks like the inside of a corral.
- The Gulch below the road is so severely grazed that the alluvial benches support nothing but prickly pear tumbleweed and snakeweed. Cows are left to return to Boulder on there own usually in June and cows regularly go back out to Deer Creek, The Draw and The Gulch to forage in early summer when they have nothing to eat in Boulder.
- The upper Gulch above the road and connecting to the Circle Cliffs is severely eroded and has a year around herd of cows, both feral and branded. The vast alluvial benches above the stream and side drainages are covered almost exclusively by decadent Sagebrush. Hikers from Boulder complain of the

upper Gulch stinking of cattle all summer. All summer growth is clipped continuously. Grazing in the entire Gulch is contrary to the huge recreation use of the canyon.

- The Circle Cliffs north has deep alluvial soil that used to have "endless grass up to a horses belly" according to the old timers who were in Boulder when I moved here. Thousands of sheep and cattle before the Taylor Grazing Act reduced it to barren soils and deep gullies that drained water tables. Extensive damming and reseeding were done but failed and keep failing when repaired because the area was never rested from grazing. A few years ago a large reseeding was done but it failed for 3 reasons: drought, a Jackrabbit explosion and I observed groups of cows even though it was supposed to be rested. This area is largely in bad shape and needs to recover before it should be grazed again. This would benefit the grassland for grazing. A large area in the north Circle Cliffs should be retired as a reference area in alluvial soils.
- The Circle Cliffs south (the Moodys) has also never recovered from overgrazing and because of the sensitive soils should not be grazed. It is not appropriate for the monument to allow an area to be so abused that snakeweed is the predominant plant.
- The Escalante River corridor was retired and the change is dramatic and remarkable. Grass now dominates the banks and sediment has increased the bottom land by feet. Floods waters are slowed by the growth so that sediment drops out and fertilizes and builds soil which in turn makes more growth. The dry river terraces have become covered in dry land grasses so thickly that the sand is hardly visible.
- Cottonwood Canyon above Deer Creek always had huge sandy floods that impacted our irrigation diversion. Its drainage area begins on Lookout Point on Boulder Mountain and includes vast areas of Navaho sandstone slick rock. Unbelievably what used to be a rocky barren wash has completely been filled with willows and grass that slows the floods and filters out almost all the sand. This area should be studied as a prime example a healthy riparian wash and used as a reference.

Comment Excerpt Text:

A segment in the summary under this option states: "To achieve this objective, GSENM or GCNRA allotments or pastures that are voluntarily relinquished or otherwise retired may be put into nonuse...". I don't know a single rancher who is going to voluntarily give up his livelihood, his passion, and his role as provider to his family in order to make this a viable option. Moreover, the phrase otherwise retired, is only a veiled threat of seizure without compensation.

Comment Excerpt Text:

Retiring pastures from grazing when permittees relinquish their permits should also be a part of the Monuments grazing plan.

Comment Excerpt Text:

This alternative notes that voluntarily relinquished or retired allotments may be put into non-use. This action would be a clear violation of the Taylor Grazing Act and have a negative impact on the local economy. Allotments cannot, and should not, be put into non-use on the basis of voluntary actions by permittees.

Section 2.4 - Alternative D

Comment Excerpt Text:

Include a process for addressing relinquished permits in Alt. D. Allow application by qualified applicants, and issue permit according to process outlined in current regulations.

Comment Excerpt Text:

I would like to see more cattle, more goats, more wood gathering, mining, mineral extraction, etc., because as a people we need energy, food and resources that comes only from the earth.

Comment Excerpt Text:

Specific concerns on Alt D management actions are as follows: Alt D encourages the use of machinery to clear thousands of acres of P-J, even in Primitive Zones. Alt D does not allow the voluntary relinquishment of grazing permits and the conversion to forage reserves or reduce grazing/recreation conflicts.

Comment Excerpt Text:

Page 46-47 Action

“Manage following areas as unavailable...” If these areas are to be excluded from grazing the reasons(s) and the supporting documentation should be included, e.g. why was it decided to exclude them and why could not grazing be re-introduced at some time?

Comment Excerpt Text:

Page 53 Action

“If ungrazed reference areas are established, do not exceed 0.5 % in any allotment or 0.5% in the GSENM...” It seems unnecessary to specify the amount of area to be involved, although this would allow up to 11,000 acres for such areas, which would seem sufficient for any reasonable purpose. A clause should be added to this statement: “Any decision by BLM to establish ungrazed reference areas should be preceded by a justification and a plan for monitoring the area and interpreting the results. It should also include sufficient money in BLM’s/Monument’s annual budget to carry out such monitoring and analysis of the results by qualified personnel.”

Comment Excerpt Text:

Alternative D speaks of the “values” of the grazing industry, but fails to define exactly what those values are.

Comment Excerpt Text:

I am stymied by what “values of the grazing industry” serve the common good of the general public.

Comment Excerpt Text:

We understand the need to take out acreage that is unattainable for livestock use and small areas where visitor camping is subject to integration by livestock. These can be locally identified by a joint committee. The fact that Alternative D speaks to consistency with state and local ordinances and plans will easily allow coordination with these entities and the use specialists from GIP to assist in determination of lands not suited for grazing.

Comment Excerpt Text:

I feel protected by President Clinton's declaring that nothing would change regarding ranching within the GSENM. This was a heritage that even he recognized. A heritage that must continue and be allowed to flourish and develop.

Comment Excerpt Text:

process for relinquished permits - If any are relinquished, allow application by qualified applicants and issue permit based on current regulations

Section 2.5 - Alternative E

Comment Excerpt Text:

Include a process to retire allotments,

Comment Excerpt Text:

Current text reads: At the top of p. 58, it states, “In GSENM and Glen Canyon NRA where local reference areas are preferable but do not exist, designate reference areas. Depending on the purpose, reference areas can be various sizes and would occur in a variety of ecosystem and plant community types (both upland and riparian).”

Recommended change: “In GSENM and Glen Canyon NRA where local reference areas are preferable but do not exist, designate reference areas. Depending on the purpose, reference areas should be at least ten acres in size, or at watershed scale to allow hydrologic function be incorporated into the reference area. Each Range Site Type (as defined by the NRCS Ecological Site Descriptions) in the Monument and Glen Canyon NRA should be replicated in one or more exclosures. These reference areas will be ungrazed, and maintained to remain ungrazed for the long-term.”

Rationale: The current wording is far too vague. There are specifics on reference areas and grazing exclosures in Alternative C, and these need to apply to all alternatives when it comes to an issue as important as reference areas in this National Monument, especially one where the current management plan emphasizes the role of both science and adaptive management. Moreover, most current grazing exclosures, where they do exist in the Monument, are either too small or poorly maintained (or both) to really serve their intended role in either research or adaptive management.

SECTION 3 - LIVESTOCK GRAZING - AUMS AND OTHER FORAGE

Comment Excerpt Text:

With all due respect to the cattlemen who have leases we believe that the grazing numbers need to be adjusted downward.

Comment Excerpt Text:

Standards to determine the variety of factors to indicate when and where livestock should be allowed – yearly and seasonally - must be based on potential for the site not based on previous year’s use – this leads to assured decline of forage quality.

Comment Excerpt Text:

Permittees must be held accountable. If a rancher doesn’t adequately manage their allotments, they should see penalties such as decreased AMUs or forfeiture of their allotment permits. Permittees who are good stewards of the land should be rewarded with the opportunity to obtain allotments forfeited due to overgrazing or other abuse.

Comment Excerpt Text:

Existing maps of grazing allotments imply that the entire monument is suitable for grazing. However, large expanses of slickrock, dry washes, inaccessible cliffs and mesas, and desert areas offer no grazing potential (due to lack of accessible forage). Improved roads and other surface developments would also need to be subtracted from acreage available for grazing. Furthermore, variations in geology, soils, elevation, water availability for plants, distance from water source for cattle, and local climate creates variability in forage quality and availability from place to place. Yet, I do not think that the GSENM has a detailed map showing variations in grazing

potential in the monument. Ultimately, a map illustrating differing amounts of sustainable forage available in different parts of an allotment would help to define its overall grazing potential. The sustainable forage scale for the map might be given in Animal Unit Months (AMUs)/acre to help to accurately determine the total sustainable AMUs/allotment. Such a map would be an essential management tool for GSENM Range personnel and also useful for ranchers wanting best utilize available forage on their allotments. Given these variations in grazing potential, closing entire allotments does not necessarily account for where grazing is appropriate or not.

Comment Excerpt Text:

We suggested, as did others during the scoping comment period that the bench mark for any studies to establish a credible time frame for a model was by using the AUM numbers both active and suspended together with the income numbers prior to designation of the Glen Canyon National Recreation Area in 1972 to the present. Without doing this we believe the public is probably not been given a full scope of alternatives and of information for comparison. We have been given information that only about 36% of the prior existing AUM's was authorized when the monument was created. Maybe that fact would have been brought forward to public review if our recommendation was followed.

Comment Excerpt Text:

There is considerable amount of land in the monument that is not capable or suitable for livestock (see the attached map).

Comment Excerpt Text:

In areas to be grazed by livestock, the amount of forage produced must be determined and allocations of forage to watershed protection (50%), wildlife (25%) and livestock (25%) be made as recommended by Holechek et al (1998)[1]. Field data collection will be necessary to accomplish this.

Comment Excerpt Text:

The Summary of Preliminary Alternatives chart on page 2 says that the Monument currently has 76,957 active AUMs "available for grazing". This phrase is incorrect. It implies that there is actually forage on the ground to support these numbers of livestock. This should be changed to read "AUMs proposed for grazing." It is important to provide a disclaimer that these AUM numbers do not reflect the results of range carrying capacity analysis. A disclaimer would more clearly indicate that this decision describes the permitted number and not forage availability.

Comment Excerpt Text:

Predicating the draft amendment forage analysis on outdated data puts all the AUM estimates, planning proposals, and conclusions in the document in question. Stocking levels cannot be adequately established, and BLM does not have an adequate baseline on which to design future management. Consequently, an accurate assessment of current forage production for each allotment is necessary for this EIS.

Comment Excerpt Text:

BLM needs to use carrying capacity analysis as part of a process to assess stocking numbers. Currently, permitted numbers often exceed carrying capacity for many allotments. BLM has no basis on which to justify stocking numbers. Additionally, BLM's methods for assessing rangeland health fail to adequately identify all lands that don't meet standards. Both the field methods used and BLM's process to analyze assessments fail to identify major problems. Secretarial Order 3308, Manual 6100 and Manual 6220 lay out a wide range of NLCS-specific requirements. For example, BLM's multiple use management is subservient to conserving, protecting, and

restoring the objects and values for which Monuments and National Conservation Areas were designated for. Unfortunately, the BLM has entirely ignored these requirements in its development of alternatives.

Comment Excerpt Text:

BLM failed to identify as an issue the fact that, for many allotments, ranchers report significantly higher grazing use than the true number of livestock using the rangelands. BLM has remained silent on this reported problem now for more than a decade. The problem remains and poses a serious management shortcoming, if not an illegal action, by knowingly relying on proven false data

Section 3.1 - Alternative A

Comment Excerpt Text:

“Create a grass bank or forage reserve....” Kane County does not believe that grass banks and forage and other improvements on grass banks are generally not maintained because there is no permittee to do the work, so they are seldom useful when an emergency occurs.

Comment Excerpt Text:

Page 28 Action

“Non-native plants will not be used to increase forage...” This should be restated to say that non-native plants will not be used only to increase forage. The usual reason for reseeding with either native or non-native plants is because without seeding there will not be adequate soil protection or composition of perennial plants. Reseeding with either natives or non-natives will usually increase forage for livestock or wildlife or both.

Section 3.2 - Alternative B

Comment Excerpt Text:

It is necessary to phase out grazing by not renewing existing permits and to begin a full environmental impact study for this ecologically sensitive national treasure.

Section 3.3 - Alternative C

Comment Excerpt Text:

Allotments should be reviewed for potential grazing before renewals and withdrawn if overused and retired.

Comment Excerpt Text:

The acreage figures presented for Alternative C. are misleading. Acres “available” and “unavailable” are shown as 1,920,100 and 306,900, respectively, in the table, although the footnote indicates this would actually be 1,805,300 and 451,300. The latter figures should be shown in the body of the table since they are the proposed acres unavailable? The latter (1,805,300 and 451,300) add to 2,256,600, which is about 14,000 acres less than the total available plus unavailable acres for the other alternatives (about 2, 242,300, although the totals vary somewhat among alternatives due to rounding?).

Comment Excerpt Text:

asserting that a 30% utilization should be cut to 25% in drought conditions is problematic because range professionals would have a difficult time distinguishing between those two utilization levels. Furthermore, it is a pointless change as the grass will not respond differently to 25% vs. 30% defoliation. In addition, some of the values chosen, such as 80% similarity to historic plant conditions may simply not be obtainable. It sets an arbitrary and unrealistic goal for management that would be destined to fail.

Comment Excerpt Text:

There are contrary statements indicating that areas not meeting Objectives should be put into nonuse and will utilize a rider to aid in making measurable progress.[8] Both actions cannot occur on the same allotment.

Comment Excerpt Text:

An Action item proposes utilization limits of 25% within pastures during drought years. Again, this represents a misunderstanding of the ecology of the plants. In a drought year, plants are dormant so restrictions would not make a difference to the plant. An influential time to consider for the plant is the first wet year following drought.

Section 3.4 - Alternative D**Comment Excerpt Text:**

Allow use of forage reserve allotments at least every three years by any permittee if not being used for emergency use.

Comment Excerpt Text:

Establish the following allotments as forage reserves: Escalante River, Spencer Bench and Rattlesnake Bench.

Comment Excerpt Text:

Establish the current listed forage reserves as available to grazing: Little Bowns Bench, Wolverine Bench (Deer Creek Allotment), and Phipps Pasture (Phipps Allotment).

Comment Excerpt Text:

Specific concerns on Alt D management actions are as follows: 76,957 active AUMs seems extremely high, particularly when considering our current drought and forecasts for adverse climate change on the Colorado Plateau. There would have to be major structural and non-structural range improvements to reach 77,000 AUMs. One must ask if such improvements would be sustainable for the long term.

Comment Excerpt Text:

Specific concerns on Alt D management actions are as follows: Forage Reserves are a tool allowing for good grazing management as explained in the middle of Page 46. Voluntary relinquishment may allow for an increase in Forage Reserves. We believe that opening Forage Reserves should be a decision made only by the Monument Manager. We understand the decision is currently made by the local range specialist or by the Assistant Monument Manager for Resources Division. There should be a clear statement as to who makes the decision to permit the use of a Forage Reserve.

Comment Excerpt Text:

Page 46 Allowable Use

“Allocate 2,137,000 acres and 106,202 AUMs....” These figures give the impression, both here and in the summary table, that stocking rates are going to be increased substantially and immediately under this alternative. In fact, that is not true. The figures shown are the existing permitted levels which have been in place for a number of years. Actual authorized use has been only 76,957 with 29,245 in suspended use. The suspended use reflects BLM’s determination that forage was insufficient to support the full permitted use. This could have been due to various factors such as reduction of forage due to brush invasion or drought or to real or assumed conflicts with other uses. At any rate, this alternative does not automatically return stocking rates to permitted use, but would allow them to be increased up to that level if resource conditions permit. That decision would be based on monitoring.

Comment Excerpt Text:

Page 46 Action

“Maintain forage reserves....” This statement calls for maintenance of improvements in any are designated as a forage reserve. Kane County’s position is generally that forage reserves (grass banks) are generally just a way to reduce stocking and that experience has shown that they seldom are really effective in helping permittees met emergencies such as drought, fire or other events, especially since the waters, fences and corrals are often not maintained in working condition. If there are going to be forage reserves in the grazing plan it is essential that the requirement be included to maintain the improvements and the responsibility for that maintenance be identified.

Comment Excerpt Text:

Would set the maximum area devoted to reference areas, were they to be established, at 0.05% of any allotment or the Monument as a whole. This is a completely arbitrary number, with no scientific justification. It seems merely an attempt to keep the reference areas as small as possible. The fact is that to be effective such areas must be of sufficient size to permit natural landscape level processes (e.g., hydrologic and nutrient cycling; complex biological relationships) to occur unimpeded by adjacent unnatural disturbances. In addition, reference areas will ideally capture some of the most significant natural variation (soils, vegetation types) within a managed grazing area. Given the very large size and complexity of some of the allotments within the GSENM, such a restriction on maximum size would make this impossible. Even though ungrazed areas would not count toward the Monument total, this same alternative would reduce the ungrazed acreage substantially.

Comment Excerpt Text:

BLM should allow AUM’s in suspension to become available for permitting purposes under predetermined benchmarks. This plan should address this action through the present NEPA analysis. This action would allow higher grazing AUM’s to be permitted for those years of high precipitation or climatic changes. To allow higher grazing numbers would benefit the control of cheat grass or any other biofuel buildup in a more streamline manner. The Utah Grazing Improvement Program, (GIP) under the Utah Department of Agriculture and Food, (UDAF) has for many years now had a, “war on cheatgrass” to reduce rangeland fire by fuel load reduction. They have a technical committee and range specialists that can be of great assistance for monitoring and data dissemination. Cooperative oversight would benefit rangeland and watershed health.

Comment Excerpt Text:

Alternative D is intended to recognize the historic and cultural importance of the livestock industry while emphasizing healthy landscapes to support multiple uses. It is also designed to be consistent with State and County ordinances and plans. This alternative is also intended to show and allow livestock management to actively promote rangeland health through adaptive management principles and innovative livestock practices. To do this, local flexibility needs to be given by this plan. A very important aspect of this is to allow suspended AUMS and unavailable allotments to be returned to active use when range conditions improve.

Comment Excerpt Text:

As rangeland management practices are implemented through sound science-based principles, livestock and wildlife benefit from these actions. Forage can be increased as water and other resources are managed with the objective of increasing productivity. Alternative D would provide the possibility that suspended AUM's be returned to active use as the results of these improvements allow.

Comment Excerpt Text:

In the section for Allowable Use of forage reserves on nonrenewable basis under 43 CFR 4110.3-1 (c), fire prevention should be noted as a reason of use. [10]

Comment Excerpt Text:

Move the following from not available to forage reserve: Escalante River, Spencer Bench, Rattlesnake Bench

Comment Excerpt Text:

Move the following from forage reserve to available to grazing: Little Bown's Bench, Phipps (Phipps Pasture), and Wolverine Bench of Deer Creek Allotment.

Comment Excerpt Text:

Allow forage reserves to be used every 3rd year by any permittee if not being used for emergency, drought, etc.

Section 3.5 - Alternative E**Comment Excerpt Text:**

Allow use of forage reserve allotments at least every three years by any permittee if not being used for emergency use.

Comment Excerpt Text:

Following are specific comments on Alt E management actions: Strengthen the Action Statement that discusses prioritizing the use of forage reserves with a statement about what management official has the authority to open a forage reserve for grazing. We recommend that decision should be reserved to the Monument Manager alone. This Action should state that voluntary relinquishment of a grazing permit is allowed to establish a forage reserve, reduce recreation/livestock conflicts or to establish a reference area.

Comment Excerpt Text:

Following are specific comments on Alt E management actions: At the bottom of Page 57, there needs to be clarification when changes in pasture or allotment boundaries can be made in GSENM and GLCA. Assumedly, the purpose of the boundary change wouldn't be to intrude on an area already closed to grazing. This Action Statement would be strengthened and might even become acceptable with this clarification.

Comment Excerpt Text:

Page 55 Allowable Use

"Allocate...75000 AUMs as available..." This statement probably represents the main difference between this Alternative and Alternative D. Alternative E only "allocates" 75000 AUMs for livestock, which is about the currently authorized use, but excludes the suspended use included in current permits. The implication is that new permits would be issued at about the same levels of currently authorized use, which would effectively set a limit on any increases beyond that level whether range improvements and improved resource conditions would permit a higher stocking or not. Kane County rejects this approach. Proper stocking rates should be determined on forage available and consistency with other resource goals on an individual allotment basis. There should not be blanket restrictions on stocking rates across the entire GSENM.

Comment Excerpt Text:

We are opposed to the Emphasize Sustained Use and Achieve Rangeland Health Standards Alternative because its main purpose seems to be to satisfy permittees and local politicians by increasing grazing on the Monument through increased production of native and non-native forage available without a scientific basis

Comment Excerpt Text:

Although this alternative acknowledges that reference areas might be desirable in some situations, it does not appear to consider them a priority nor does it specify how reference areas might integrate into management decision-making. The commitment to reference areas seems lukewarm at best.

Comment Excerpt Text:

The allowable use section has already determined the number of acres in the number of AUMs that will be allocated to livestock without undertaking any analysis whatsoever regarding current forage availability or NLCS and NPS requirements.

The alternative also opens a number of closed allotments without the above analysis.

SECTION 4 - LIVESTOCK GRAZING - GRAZING MANAGEMENT PRACTICES, INCLUDING SEEDINGS**Comment Excerpt Text:**

We need to be able to improve range conditions by new reseeding or managing old ones.

Comment Excerpt Text:

We need to be able to use nonnative as well as native plants to reseed.

Comment Excerpt Text:

Permits to be renewable every 2 years, 3 years at the outside, and emphasize land stewardship

Comment Excerpt Text:

Changes such as supplying additional water away from sensitive areas to “lure” cattle away and changing the timing and intensity of grazing are changes that can improve the environment without banning cattle grazing from less environmentally sensitive areas.

Comment Excerpt Text:

Action on top of Page 36 about requiring the use of a rider is essential in the new Grazing Management Plan for maintaining fences, monitoring use and water sources, livestock conditions, etc. This should be added to Alts C, D, & E. We do not know if the standard 5 out of 7 days is appropriate but such a standard should be established.

Comment Excerpt Text:

We have major concerns with the action statements regarding native grass seedlings and seed on pages 39 & 40. Our concerns are applicable in Alts A, C, D, and E. There needs to be a clear definition of what is “native” when it comes to restoration and reseeding within a National Monument, a National Conservation Lands Unit.

Comment Excerpt Text:

Alt A and C imposed constraints of the MMP. It is implied that Alt D and E do not. It is not clear why there should be any difference among these alternatives with regard to construction and maintenance of fences, cattleguards, etc. If grazing is allowed, as all these do, it is necessary that needed improvements be constructed and maintained. Restrictions in the MMP that make it difficult or excessively expensive to carry this out should be removed.

Comment Excerpt Text:

Alternatives D and E are the only ones that make sense. If grazing is allowed, then line shacks may be needed and that need should be evaluated on a case by case basis.

Comment Excerpt Text:

Although stated differently, there does not seem to be much difference in Alt A compared to Alts D and E. Both say that water developments can be done to improve livestock distribution and to help manage riparian areas or vegetation treatments, i.e. when they will further range health goals of the GSENM. Current restrictions in the MMP, however, make it difficult and expensive to construct and/or maintain water developments. These provisions should be eliminated from the MMP.

Comment Excerpt Text:

Kane County takes the position that adaptive management would benefit more by monitoring the effects of different grazing plans or other range treatments than by investing a large effort in grazing exclosures which do not represent the management goals already stated for GSENM, i.e. continued livestock grazing and other range uses. Kane County agrees, so long as "best science" is not used as justification to reduce livestock grazing. "Best Science" must be fact based and justify any reductions or increases in livestock grazing.

Comment Excerpt Text:

Kane County supports adaptive management as a process for successful incorporation of monitoring information and new scientific knowledge and/or technology into achieving resource management objectives. To that end, we believe that management guidelines should be flexible and not unnecessarily restricted by pre-determined specific rules and requirements that may hamper the application of innovation in applying adaptive management. It is understood that both BLM and NPS must operate within applicable laws and regulations, including the provisions of the proclamation. This could, and should result in increased livestock grazing

Comment Excerpt Text:

It is not clear what the difference is between "maintain" and "restore"? Might be clearer to just say Alt A, D and E allow seeding of non-native species and Alt B and C do not.

Comment Excerpt Text:

Employing these cowboys is one of the few positive economic impacts of grazing on the monument; it should be required. Setting an arbitrary number of days per week on an allotment might not be practical; however, having cowboys spend enough time working with their cattle could be gauged by the health of the cattle and range in their allotment. If the health of the livestock or the land are degraded, then a mitigation strategy should be developed that will probably require a cowboy on the range to make it work. If the mitigation strategy fails, then the livestock should be removed and if necessary the permit relinquished.

Comment Excerpt Text:

I believe that we can eliminate a lot of conflict with recreationists by better distribution of livestock. New water and range improvements will allow us to pull livestock away from problem areas.

Section 4.1 - Alternative A**Comment Excerpt Text:**

The requirement in Alt A that water development not be used to increase livestock numbers should be removed. If livestock grazing is a valid use, then water development should be used to make full use of the forage resource compatible with other Monument objectives?

Comment Excerpt Text:

Alt A – the statement does not describe the current situation where pasture moves are prescribed by date and little flexibility is allowed. Alternative should make this statement.

Comment Excerpt Text:

“Critical riparian areas... will be fenced.” The definition of “critical” is not provided; decisions to fence or not should be based on a case by case consideration of monitoring data and consideration of other alternatives.

Comment Excerpt Text:

“Non-structural range improvements are not appropriate.” “Non-structural” range improvements we assume refers to brush control and/or reseeding. These improvements are sometimes needed to accomplish the goals and objectives for soil stability, water quality and other resource values stated earlier.

Comment Excerpt Text:

Page 27 Action

The last two actions on this page refer to use of native and non-native species. Blanket prohibitions against use of non-native species, even to the point of favoring local genotypes, may make it difficult to achieve objectives of achieving a “functioning” ecosystem. Local plants may not be available, they may be expensive, they may not establish easily, and, if climate change is real, they may not even be the most adapted species. Use of native species may be preferred but practical and effective management may benefit in some cases by using nonnatives.

Section 4.3 - Alternative C**Comment Excerpt Text:**

Only native seeding should be allowed.

Comment Excerpt Text:

Essential to this sound alternative would be the requirement that changes in grazing systems be considered before implementation of mechanical treatments and/or more fencing.

Comment Excerpt Text:

Require lands to be rested at least one of every three years, critical to ecosystem recovery.

Comment Excerpt Text:

Requiring that any fencing necessary to meet objectives will be built by permittees and requiring that it be functional prior to grazing animals being allowed to enter.

Comment Excerpt Text:

Historically BLM has struggled with having enough personal to manage the grazing and keep the infrastructure for fencing and water operational as it exists now. The plan “C” wisely calls for a higher level of grazing management, rotation, timing, etc. How can this be regulated and managed without devoting additional staff to the Monument?

Comment Excerpt Text:

The plan “C” requires more infrastructure in order to do the grazing management mentioned in my previous comment. Additional fencing and water development are necessary to implement the better livestock grazing practices that are integral to this alternative. Can BLM come up with the funds or matching funds for entries like NRCS in order to construct these improvements.

Comment Excerpt Text:

Grazing should be reduced to 2 out of 3 years to allow a minimum of habitat recovery.

Comment Excerpt Text:

Land managers should evaluate the allotment against a set of established, public objective criteria before making a decision to transfer the allotment to another permittee.

Comment Excerpt Text:

Vegetation management should prioritize native plant species recovery and it should be in compliance with the Monument Management Plan.

Comment Excerpt Text:

BLM should commit to resting grazing allotments every third year to allow for native plant species recovery. The grazing management plan should establish measurable standards for the amount of habitat degradation that is allowed to occur from livestock grazing.

Comment Excerpt Text:

prevent changing the Plan to maintain indigenous plants and pollinators.

Comment Excerpt Text:

no allotment should be grazed for more than 2 out of every 3 years, monument-wide

Comment Excerpt Text:

Do not allow further encroachment or changes in the MMP in regards to increased vegetation seedings and treatments for forage

Comment Excerpt Text:

also prevent changing the Monument Plan to alter plant communities by treatments that include exotic species.

Comment Excerpt Text:

prevent changing monument plan to allow planting exotic grasses

Comment Excerpt Text:

do not change the monument management plan to allow destroying more sagebrush to plant exotic grasses for cattle

Comment Excerpt Text:

native plants and grasses need opportunities to thrive by preventing destruction of sagebrush

Comment Excerpt Text:

Where veg treatments are implemented use only NATIVE seed.

Comment Excerpt Text:

Base sustainable management decisions on diverse indicators, not just grass utilization

Comment Excerpt Text:

Do not allow destruction of sagebrush and pinyon/juniper; do not plant exotic grasses for cattle grazing (except in a very rare emergency situation)

Comment Excerpt Text:

Please abandon the effort to open the GSENM Management Plan for increasing vegetation seeding & treatment for livestock forage

Comment Excerpt Text:

Using native only species for restoration would be expensive, and may not meet objectives if an area is already infested with invasive species

Comment Excerpt Text:

Habitat restoration must be a priority. Native plants should be more important than nonnative forage plants specifically for livestock.

Comment Excerpt Text:

Only native species should be used to re-vegetate an area. The use of exotic species is in direct conflict with the Monument plan and should not continue.

Comment Excerpt Text:

In 1st paragraph page 32, insert “and structural” following the word “nonstructural” when discussing range improvements so that consideration is given to the full range of improvements

Comment Excerpt Text:

The 2nd Action discussing fencing on Page 37 is essential. Strengthen the action statement by adding the words “prior to the livestock entry for the season and maintained throughout the season by the permittee.”

Comment Excerpt Text:

Alt C is currently silent on sub-leases. To protect/enhance the local custom and culture, there should be an Action Statement on sub-leasing permits to outside interests similar to the Action Statement on leasing found in the middle of Page 56.

Comment Excerpt Text:

However, the statements under Alt. C go on to prescribe guidelines for grazing rotations that are arbitrary and contrary to the basic concept of “adaptive management.”

Comment Excerpt Text:

Season of Use GCRA

The statement under Alt C is adequate and should be repeated in Alt D and E. With this statement it is not necessary to state that management of season will be flexible since that is implied by “adaptive management”. This same statement could serve for GSENM also.

Comment Excerpt Text:

However to arbitrarily require that riders be present 5 of every 7 days anywhere an allotment is not meeting or moving toward objectives is not compatible with common sense. An allotment may not be meeting objectives for a variety of reasons, including livestock grazing but also including other factors such as wildlife, drought, recreation use, etc. The presence of a rider obviously will not further the attainment of those objectives in all cases. The requirement of 5 out of 7 days is also arbitrary and does not take into account site specific situations. This requirement is contrary to the principles of adaptive management and therefore not consistent with Kane Co RMP or MMP.

Comment Excerpt Text:

Page 32-33 Objective

“GSENM... plant communities healthy...” This statement is all that is necessary and reflects the Utah Range Health Standards. The bulleted statements are arbitrary, lack scientific basis and should be removed.

“Native plant species reflect... 80 percent...” Define where 80% comes from. Define how it would be measured. The statement mentions diversity, density, age class, and productivity. Would it have to be 80% or all of these, or would one be chosen to support a desired result? If the diversity, density, age classes, and productivity of the ungrazed reference areas does not meet range health standards and will not make progress towards those standards without treatment, does that make it a valid reference site?

“Native plant communities...” It is not clear what this statement means. Does it refer only to those plant communities described in the bullets below? Where did the 80% come from? What are appropriate quantitative measures?

“Native species reoccupy habitat niches...” Again, where did 80% come from? It is not clear what this statement means. Does it mean that exclosures will be established to a compared rate of improvement after brush control and/or reseeding in grazed vs ungrazed situations? Define the appropriate quantitative measures?

Comment Excerpt Text:

Page 36 Action

“Utilize a rider...” Riding is often a useful tool in improving livestock distribution. However, this statement should be removed because it is completely contrary to the stated policy of BLM for using adaptive management. Riding should be used when it is the most effective means of achieving resource management objectives but it will not be required to the same degree on every allotment, and may not be required at all on some allotments depending on the topography, improvements, season of use, and potential concentration areas or resource conflicts. This action is just an effort to saddle permittees with another arbitrary requirement that has no practical basis.

Comment Excerpt Text:

Page 36 Action

“Encourage a diversity of grazing arrangements...” This statement is unnecessary and should be stricken. If BLM will truly adopt an adaptive management policy that allows flexibility and innovation, instead of imposing arbitrary guidelines and rules as suggested in this alternative) all of the “arrangements” listed here can be considered and adopted as they fit a specific location.

Comment Excerpt Text:

Page 36 Action

“In GSENM and Glen Canyon....adaptively manage...” It is ironic that this action would be include in this alternative, most of which is aimed at restricting the ability to adaptively manage livestock grazing. This is evident in the Action items which precede and follow this statement. The following action items contain specific requirements regarding season of use, rotational sequences, and utilization.

All of these are arbitrary and lack scientific validity. Their only purpose is to restrict the ability of BLM and the permittees to implement adaptive management based on monitoring and flexibility in management to accommodate weather and other conditions. These should all be removed.

Comment Excerpt Text:

Page 37 Action

“Allotment Action Plans” This statement is unnecessary because it essentially just repeats what is already stated in the Utah Rangeland Health Standards, i.e. that if an allotment is not meeting or making significant progress toward meeting standards, and if current livestock grazing is determined to be the cause, then corrective action will be taken. However, this statement refers to the “objectives” listed earlier which add arbitrary and unscientific items to the Utah Standards. If the statement is retained it should just quote the Utah Range Health Standards

Comment Excerpt Text:

Page 37-38 Actions

All of the action items on page 37 and the first one on page 38 are unnecessary. The Utah Standards and Guidelines for Livestock Grazing (Appendix 3, MMP) and existing BLM best management practices and specifications for structural and non-structural range improvements are adequate and applicable to any alternative being proposed. Therefore, it is not necessary to reiterate them for only one alternative or to modify them in violation of the Proclamation.

Comment Excerpt Text:

Page 40 Action

“Restoration... will utilize native species only.” Availability of seed of native species, costs, and difficulty of establishment of native species will in some cases preclude successful “restoration” efforts. It the goal of “restoring” ecological processes is important, then it would seem logical to use the most cost effective methods that give the highest probability of success, including use of non-native species in certain situations.

Comment Excerpt Text:

Page 40 Action

“Vegetation treatments.....”

The bulleted items under this heading are not needed here. The statement “restore or support potential native vegetation and ecosystem processes” is meaningless unless “restore” and “potential” are defined. To “mimic natural processes” implies that somehow only “natural” processes will furnish a desired result. Both of these statements are rooted in the “balance of nature” concept which is not supported by good science. The verbiage about identifying causes of “problematic” situations and protecting seedlings from damage is not necessary – obviously if time and money are spent in “restoration” action would be taken to help insure it was successful.

Comment Excerpt Text:

Page 40 Allowable Use

“...passive restoration and non-chemical methods...” If “passive” restoration, which presumably includes changes in grazing management will result in preventing the spread of noxious plants or invasive plants, then it

would be the preferred method because it would involve less cost and ground disturbance. However, this approach should not be used as a basis for removing livestock in the hope that “natural succession” will restore such areas in any reasonable length of time. Likewise, there is no reason to give preference to non-chemical means of plant control as a blanket requirement. The appropriate method of plant control should be determined on a case by case basis. Chemical methods may be more cost effective and have fewer adverse impacts on soils and non-target species than mechanical methods.

Comment Excerpt Text:

I also think it is completely inappropriate for the Monument to be removing sagebrush and planting exotic grass species as forage for cows.

Comment Excerpt Text:

Also, to prevent changing the Monument Management Plan to allow destroying more sagebrush to plant exotic grasses for cattle

Comment Excerpt Text:

BLM efforts to address these issues will require more precise grazing terms and conditions.

Comment Excerpt Text:

Allowing some pastures to rest for a season or two will likely be a necessary part of a

Comment Excerpt Text:

This alternative would limit the kind of livestock to utilize only cattle and horses. There is no reason to artificially limit GSENM and Glen Canyon NRA livestock especially considering the area was historically used as a major sheep wintering area.

Comment Excerpt Text:

An Action item in this alternative uses rest-rotation grazing so that areas are not grazed more than 2 out of 3 years.[9] This Action demonstrates a misunderstanding of rangeland management principles. It would do little to improve plant vigor or resource health and only serves to decrease 33% of forage on the Monument. A better action for increasing plant vigor would be to move more Monument grazing towards winter use.

Section 4.4 - Alternative D

Comment Excerpt Text:

It would also be good to be able to flex the season of use on some pastures to be able to protect the resources. This would give the BLM range cons more flexibility.

Comment Excerpt Text:

It would also be important to be able to use mechanical equipment make those improvements. Continued maintenance and erosion control is always necessary. Roads and ponds are always needed to be maintained.

Comment Excerpt Text:

Do not fence off the Escalante River unless needed for seasonal grazing management (i.e., rotation system). Allow grazing on the river portions especially in winter months.

Comment Excerpt Text:

Allow use of best adapted species for restoration and vegetation treatments. This would include nonnative and native species. Focus on meeting plant functional diversity, cover and density rather than native vs. nonnative.

Comment Excerpt Text:

Specific concerns on Alt D management actions are as follows: The first sentence on Page 11 states that in all Alternatives, information in the MMP relevant to livestock grazing would not be modified or changed by any Alternative. However, the table on Page 50 amends the MMP decision to allow use of machinery for roller chopping, chaining, plowing and disking in Primitive Zones. This action should be removed or at the minimum, there should be a statement added to say this action is contrary to direction in the MMP.

Comment Excerpt Text:

Alternatives D & E include provisions for future vegetation improvements whose chief aim is to increase forage production for livestock. They also would allow such treatments in zones that are now classified as Primitive and Outback within the Monument boundaries. The primary justification for treatments within these zones is to rehabilitate old (generally pre-Monument) treatment sites wherein previous seedings have failed, typically due to drought stress combined with excessive grazing pressure. But such treatments often included seedings of exotic grasses rather than native species. Native species are, overall, much more drought tolerant than exotics, chiefly because they are adapted to the conditions prevailing in this region and have evolved to endure periodic and severe drought conditions. Native grasses in this area typically offer better soil stabilization and water infiltration than do exotics as well. Finally, the deliberate planting of exotic plant species runs counter to the proclamation mandate that management decisions on the Monument are to encourage the maintenance and restoration of naturally occurring plant communities. Both from this perspective as well as an economics one, it makes little sense to engage in vegetation “improvement” projects that not only violate an important goal of the Monument proclamation, but are also wasteful of limited resources in that such projects are destined to fail and will have to be redone if adequate forage levels are to be achieved. Because nearly all climate change models for this region predict more frequent and severe drought episodes, the continued planting of exotics is even less defensible. Excepting special circumstances, rangeland treatments on NPS lands are required to utilize native plants – the Monument projects should carry the same stipulation.

Comment Excerpt Text:

3. Authorizes seeding mixtures that include both exotic and native species. However, in the absence of quantitative assurances, the promise that seed mixes will contain native species means little because even a trivial contribution would satisfy the requirement.

Comment Excerpt Text:

Proposes to encourage experimentation with grazing practices and protocols (e.g., electric fencing; rest-rotation strategies; water resource development) to help discover new methods of improving rangeland health and restoration. This sounds good, but one has to be suspicious of how sincere a commitment this really is. It is a fact that provision for such experimentation was built into the original Monument Proclamation. But a decade and a half later I am unaware of any serious efforts in this direction that have been undertaken either by range staff or permittees.

Comment Excerpt Text:

a flexible grazing framework should be used that allows local rancher input so agency specialists hands are not tied by stipulations that creates inaction or prohibition and a waste of time that detract from the goals of land management and negatively affects the lands and species.

Comment Excerpt Text:

BLM should work with the local government, GIP and most import the Permittee, the only entity allowed under federal statute to hold range improvement agreements with the authorizing agency to construct and maintain

water developments for better distribution of livestock. This action is necessary whether or not it is deemed to have an overall beneficial effect on Monument resources. Under Utah law, water sources for riparian areas, or to restore or manage native species or populations is not consistent with statute; for watering livestock it is. The overflow out of water tanks could be of a benefit to some of these uses. At that level, this action may be a means of achieving a portion of the MMP objectives. This statutory requirement should seriously be considered prior to canceling or modifying any grazing allotments for other public purposes.

Comment Excerpt Text:

It is also our recommendation that grazing management in the Glen Canyon National Park be consistent with that on the Monument. This should be recognized in the GSENM grazing plan document. BLM is required under policy and federal Acts to manage grazing in this area as well as the Monument. All actions should be consistent. Undoubtedly more fencing might be needed and other matters addressed. In whole this action will bring more coordination and cooperation between all effected parties including the grazers, BLM, the Park Service, local government and state agencies. We believe that this will streamline the management and implementation of decisions.

Comment Excerpt Text:

Allow use on Escalante River during winter and rotate use to reduce Russian olive and improve access for hiking and horseback riding

Comment Excerpt Text:

Allow use of nonnative species for restoration on NPS land.

Comment Excerpt Text:

Select seeded species based on their ability to establish and function best within the site, not based on native only

Section 4.5 - Alternative E

Comment Excerpt Text:

Allow use of best adapted species for restoration and vegetation treatments. This would include nonnative and native species. Focus on meeting plant functional diversity, cover and density

Comment Excerpt Text:

Following are specific comments on Alt E management actions: Also on Page 59 there is an Action Statement that allows a mix of native and nonnative species for seedings. Is the use of nonnative species appropriate and consistent with National Conservation Lands policy? We don't think just because these seedings were established prior to 1996 that there can never be any changes made in species composition. That line of argument could be extended to several other inappropriate actions in these areas that occurred prior to 1996.

Comment Excerpt Text:

Following are specific comments on Alt E management actions: Reference the Action Statement in the middle of page 60 about native seeds. Why is it appropriate in a National Recreation Area to require the use of native seeds only and in a National Monument that is the flagship of the National Conservation Lands System, to state there only needs to be one native species in each seed mix? Refer back to our comment on Page 2 where less than 25% of the seed mix on this particular project was native seed.

Comment Excerpt Text:

Page 58 Action

“...use a variety of grazing systems....” There is no reason to list possible grazing systems to imply that all of them will be used. Under adaptive management the grazing system should be designed to meet resource needs on each allotment. If done properly, each allotment will have the grazing management plan that best suits the situation, and there may be numerous variations. Named grazing systems are only concepts, not prescriptions for management.

Comment Excerpt Text:

Alt E specifically mentions flexibility in season of use to manage for conditions and not calendar dates. This should be in alternatives C, D, and E. It is consistent with Kane Co RMP.

Comment Excerpt Text:

Alternatives D & E include provisions for future vegetation improvements whose chief aim is to increase forage production for livestock. They also would allow such treatments in zones that are now classified as Primitive and Outback within the Monument boundaries. The primary justification for treatments within these zones is to rehabilitate old (generally pre-Monument) treatment sites wherein previous seedings have failed, typically due to drought stress combined with excessive grazing pressure. But such treatments often included seedings of exotic grasses rather than native species. Native species are, overall, much more drought tolerant than exotics, chiefly because they are adapted to the conditions prevailing in this region and have evolved to endure periodic and severe drought conditions. Native grasses in this area typically offer better soil stabilization and water infiltration than do exotics as well. Finally, the deliberate planting of exotic plant species runs counter to the proclamation mandate that management decisions on the Monument are to encourage the maintenance and restoration of naturally occurring plant communities. Both from this perspective as well as an economics one, it makes little sense to engage in vegetation “improvement” projects that not only violate an important goal of the Monument proclamation, but are also wasteful of limited resources in that such projects are destined to fail and will have to be redone if adequate forage levels are to be achieved. Because nearly all climate change models for this region predict more frequent and severe drought episodes, the continued planting of exotics is even less defensible. Excepting special circumstances, rangeland treatments on NPS lands are required to utilize native plants – the Monument projects should carry the same stipulation.

Comment Excerpt Text:

Amendment to VEG-1: BLM proposes to allow for an exception to the current management prescription prioritizing native plants and to permit a mixture of native and non-native seeds to be used for existing seedings that have been done for livestock forage (Preliminary Alternatives at 59).

Recommendation: BLM must satisfy the intent of the proclamation establishing the GSENM, which states a preference for naturalness and specifically lists several components of the native ecosystem to be protected as objects of interest. In order to do this, BLM should not adopt this amendment as proposed, but rather keep the current language of the MMP prioritizing native species without exception but also allowing for the use of non-native species when clearly appropriate as set out elsewhere in the MMP.

Comment Excerpt Text:

Amendment to NAT-5: The current MMP at NAT-5 states, “Non-native plants will not be used to increase forage for livestock and wildlife.” MMP at 30. The amended plan would create an exception to this policy by

allowing for non-natives for livestock or wildlife forage when BLM is maintaining or restoring seedings for their intended purpose (Preliminary Alternatives at 59).

Setting species standards for seedings for ungulate forage differently than for other types of vegetation management projects will lead to an inefficient and often counterproductive management regime in direct violation of the Monument proclamation. Broadening the use of non-native species in the Monument for increased livestock forage conflicts with and favors a use that is not a listed Monument object of interest (i.e., seedings for livestock or wildlife forage) over uses listed as a Monument object of interest (e.g., retention and proliferation of naturalness and native species).

Given the large discrepancies between permitted AUMs and Actual Use AUMs in the Monument, the available palatable native vegetation apparently is unable to support the permitted AUMs. This would appear to be the underlying push by Preliminary Alternative E to “Maintain and/or restore [seedings] with native and nonnative species.” This amounts to an agricultural transformation of the Monument into non-native cattle pasture for the purpose of maintaining or increasing private cattle AUMs.

When estimating the “production” of forage within the Monument, it will be extremely important to separate estimates of production occurring in the Monument where cattle regularly graze from production occurring in areas lightly or not used by cattle due to inaccessibility or unavailability for grazing. Similarly, it will be important to distinguish production of native “forage” vegetation from production of non-native (generally seedings) vegetation. Seedings artificially increase vegetation production specifically for support of cattle AUMs. As native species are often preferentially utilized by cattle, the seeding of non-natives can further diminish the presence of native species, which are a stated value to be protected within the Proclamation and Monument Management Plan. 211

Table I. Appropriate and inappropriate analysis of forage production
 Appropriate Analysis: Map and separate production estimates in areas regularly used by cattle from areas occasionally or not used by cattle (e.g., inaccessibility, rarely- used grass bank areas, unavailable areas)
 Inappropriate Analysis: Estimate production without regard to whether it is regularly or rarely used by cattle

Appropriate Analysis: Separate estimates of production of native vegetation consumed by cattle as forage from production of non-native seedings for cattle. Inappropriate Analysis: Estimate production without regard to whether it is native or non-native seedings.

Appropriate Analysis: Indicate the species that are being considered as “forage” in the estimates of production
 Inappropriate Analysis: Which species are being considered as cattle “forage” are not identified in the estimates of production

Recommendations: a. The proclamation clearly states that “existing grazing uses shall continue to be governed by applicable laws and regulations other than this proclamation.” First, there is no law or regulation requiring the use of non-native species for grazing forage. Second, the proclamation is clear that the Monument’s natural state and natural species as listed should take precedence over uses that are not listed objects of interest and that conflict with or harm listed objects. Further, use of non-native species is not needed for existing grazing uses, as evidenced by the fact that the MMP has been in effect disallowing non-native species for forage since February 2000. Thus, since the use of non-native species for increased forage conflicts directly with the mandates of the proclamation and is not needed for existing grazing uses or required by law, BLM must not

adopt the proposed language in the preliminary alternatives, which would reverse the MMP's current prohibition of such activity.

b. Actual Use AUMs should be commensurate with the amount of native vegetation available for grazing of both domestic and wild ungulates and retention of native diversity, wildlife habitat, and functional biological soil crust.

Comment Excerpt Text:

Include a commitment to resting the pastures from grazing.

Comment Excerpt Text:

The alternative gets down to the level of such site-specific decisions as "divide the Buckskin pasture of the Molly's Nipple allotment to protect the seep and reduce recreation conflicts" yet is completely silent on basic range management science such as utilization limits, biological soil crust management limitations, season of use issues, etc.

We request that you again review the material we have provided above that clearly show that an RMP is required to make these basic management decisions.

Comment Excerpt Text:

Page 59 reverses the cleared direction in the MMP that disallows the use of non-native seeding on the monument. The change is provided in this section do not comply with the values and purposes for which the monument was established and must be removed from the alternative.

Comment Excerpt Text:

Alternative E would illegally deny the National Park Service authority to approve stocking decisions on Glen Canyon National Recreation Area (GCNRA). Alternative E would perpetuate the seriously flawed permit renewal process by using the 2001 Appropriations Rider and the Grazing Improvement Act (more on this below). Alternative E suggests that BLM will not decrease stocking numbers even in allotments that do not meet rangeland health standards. It also allows heavy machinery in the Primitive Zone, which was intended to be an undeveloped zone for landscape level research on natural ecosystem processes.

Comment Excerpt Text:

Alternative E's proposal for managing nonstructural range improvements (seedings) is inconsistent with the 18 separate decisions regarding vegetation in the MMP[2] and with the Proclamation mandate to protect the natural ecological values of this Monument. According to the MMP, vegetation treatments on the Monument are undertaken only to restore native plant communities and ecosystem health. Creating or maintaining nonnative seedings to support the grazing program is specifically prohibited (NAT-05). This direction is still in place, and this plan amendment cannot supplant it. The draft amendment document itself states that "Both BLM and NPS have existing planning decisions that will not be amended, modified, or updated during this plan amendment process". This plan amendment addresses grazing alone, uncoupled from vegetation management. Since the direction on vegetation restoration treatments still stands, BLM is overextending the scope of the plan amendment in addressing it at all.

Comment Excerpt Text:

Current text reads: On page 57 of Alternative E, following a voluntary relinquishment, it states that, "The Authorized Officer may take one or more of the following actions:

- Issue a grazing permit to a different applicant.

- Stock with livestock from another allotment with unmet resource objectives.
- Combine with an adjacent allotment that has unmet resource objectives.
- Consider use of the allotment as a forage reserve (i.e. continue livestock grazing but do not recognize an individual with preference to the forage).
- Amend or revise the land use plan to allocate forage to uses other than livestock grazing.”

Recommended change: This text instead read, “The Authorized Officer may take one or more of the following actions:

Place the allotment into a forage reserve that will be activated once vegetation and biocrust reach the Historic Climax Plant Community. Reserves may be used a maximum of 1 year in 10.

Waived permits will be allocated to wildlife and ecosystem recovery.

Rationale: When a permittee relinquishes his permit on GSENM, it is more in keeping with the current Monument Management Plan and certainly the GCNRA Management Plan not to immediately reauthorize grazing. Instead, the forage in the allotment should be preserved for a potential grass bank, or, more importantly, for other uses and values.

Comment Excerpt Text:

Current text reads: On p. 59 of Alternative E, it states, “Allow use of machinery (e.g., roller chopping, chaining, bull hogging, discing, plowing) in existing seedings, including seedings in the Primitive Zone. Equipment selection will be made with an emphasis on minimizing surface disturbance and detrimental impacts to soils.”

Recommended change: “Allow use of machinery (e.g., roller chopping, chaining, bull hogging, discing, plowing) only when converting non-native seedings to native seedings, and excluding seedings in the Primitive Zone. Equipment selection will be made with an emphasis on minimizing surface disturbance and detrimental impacts to soils.”

Rationale: There should not be exemptions for machinery in the Primitive Zone, which was established in the MMP to “facilitate landscape-scale research” and is “intended to connect primitive and underdeveloped areas on surrounding lands...” Allowing such heavy equipment and surface disturbance will negate the reason the Primitive Zone was established. BLM is overreaching by using the grazing plan amendment to change Primitive Zone management.

SECTION 5 - LIVESTOCK GRAZING - RANGELAND HEALTH

Comment Excerpt Text:

Any grazing plan should prioritize healthy land to achieve sustainable grazing.

Comment Excerpt Text:

We recommend an Action Statement to eliminate Common Pastures, implemented over time and when possible. That way if there is a problem of a fence not being maintained, there is only one permittee responsible for that fence. Eliminating common pastures may also solve other grazing problems.

Comment Excerpt Text:

Page 32 Goal 2

If this goal is common to Alternatives C, D, and E, then why was it not included in the section “Common to All Alternatives” starting on page 11? This goal basically says that management will have to meet or make significant progress toward meeting the Utah Standards of Rangeland Health, whether it is grazed or not. Therefore, it applies to all of the alternatives, including B.

Comment Excerpt Text:

We are confused, however, by Goal 2 (common among Alternatives C, D, and E), which states “in GSENM and Glen Canyon NRA manage livestock grazing to meet or make progress towards meeting rangeland health standards where grazing is a causal factor”. We suggest the following change to reflect a goal of achieving rangeland health in all allotments: “in GSENM and Glen Canyon NRA manage livestock grazing to meet or make progress towards meeting rangeland health standards in all grazing allotments.”

Comment Excerpt Text:

BLM has incorrectly used methods for BLM lands (i.e. the Rangeland Health Standards) for GCNRA lands. In fact, this planning amendment states that for all alternatives BLM will make this decision without NPS involvement or approval. In doing so, BLM is not developing the management appropriate for the NRA requirements, such as the non-impairment requirement. In fact, all alternatives must allow for the National Park Service, with BLM assistance, to determine the livestock stocking levels in the NRA as well as season of use and similar decisions.

Comment Excerpt Text:

Based upon BLM statements, the state anticipates the outcome of this planning process will lead BLM to maintain and improve rangeland health while upholding the objects and values contained within the Monument, yet the BLM’s written documents fail to support this view.

Section 5.1 - Alternative A**Comment Excerpt Text:**

Alternative A includes the goal that “Grazing will ultimately be addressed after the completion of assessments for each grazing allotment and the preparation of new allotment management plans (MMP, p. 4)” All assessments should be completed before consideration of this alternative.

Comment Excerpt Text:

The objective: “Improve the condition on suitable and potentially suitable Federal range that is now in poor condition and achieve an upward trend on range that is in a static or downward trend (Escalante MFP RM-2, similar RM-2 in other MFPs)” provides for allowing cattle on range in poor condition. Cattle should not be turned out (no “Allowable Use”) on range determined to be in poor condition.

Comment Excerpt Text:

The objective “to manage riparian areas so as to maintain or restore them to properly functioning conditions” may include cattle grazing in riparian areas not meeting the pfc criteria. There should be no “Allowable Use” in riparian areas needing to be restored or where this assessment has not been completed.

Comment Excerpt Text:

“Improve the condition...” What does “condition” mean? Does this refer to the old system of range condition classification as good, fair, poor (high, med, low seral)? If so, Kane County does not support this objective since

it is based on an obsolete approach which has been replaced by standards of rangeland health and the state and transition/desired plant community concepts.

Comment Excerpt Text:

Page 26 Goal

This goal statement does not provide a rational basis for management of the GSENM. Define a “natural range of native plant associations.” Does this refer to pre settlement conditions? If so, does BLM know what that natural range was, or if it is even achievable under current conditions? The goal further states that “management” will not be allowed to shift the “makeup”, “normal population dynamics”, or “normal progression” of those associations.

Does this assume that lack of management will meet those goals even if the current vegetation does not represent the “natural” range of associations? This statement is basically meaningless. Additionally, we question this unless the plant would be considered noxious. Non-native plants may also help stabilize soil and provide vital nutrients to soil.

Comment Excerpt Text:

Page 26 Action

This action refers to a previous objective to assess PFC on all riparian areas within 3 years of the adoption of the MMP. Was this done? If so, why does it need to be restated?

Comment Excerpt Text:

Page 27 Action

“Chemical methods will be restricted....” Why should chemical methods be restricted? Kane County believes that the appropriate method should be decided on a case by case basis as described above.

Comment Excerpt Text:

Page 28 Action

“Many factors....” The guidelines listed under this action repeatedly refer to “restoration” of natural conditions. Kane County believes that this language does not provide a good basis for such guidelines. “Restoration” implies a return to former conditions which may or may not be achievable or even desirable. It would be better to restate these guidelines in terms of what is to be accomplished, i.e. stabilization of soil, increasing species diversity or productivity, improving wildlife habitat, etc.

Section 5.2 - Alternative B

Comment Excerpt Text:

Alternative B “would discontinue livestock grazing in GSENM and Glen Canyon NRA”. No “Allowable Us” should be permitted wherever assessments have not been completed, condition has been determined to be less than satisfactory, or riparian areas are not in pfc; those conditions leave Alternative B as the only viable alternative.

Section 5.3 - Alternative C

Comment Excerpt Text:

Alternative C may include management of cattle grazing that “restores the objects and values of the Proclamation and the values and purposes of Glen Canyon NRA”. No “Allowable Us” should be permitted wherever assessments have not been completed, condition has been determined to be less than satisfactory, riparian areas are not in pfc, or values need to be restored.

Comment Excerpt Text:

The goal to “manage livestock grazing to meet or make progress towards meeting rangeland health standards” suggests that this alternative may provide for “Allowable Use” where such standards are not met. There should be no “Allowable Use” where rangeland health standards have not been met or assessed; those conditions leave Alternative B as the only viable alternative.

Comment Excerpt Text:

The Dry Fork of Coyote has been beaten nearly to death, to the point where there is little left but tumbleweeds and cheatgrass on the alluvial terraces. Evidence of how it should look can be found in the upper reaches of one of the side canyons where a rockfall has kept cows out for a long time, and it is incredibly lush with all of the native species that belong there, in stark contrast to the area below the rockfall and the rest of the Dry Fork.

Comment Excerpt Text:

Page 35 Action

“...areas that are not meeting or moving toward “Objectives ... would be put into non-use....” This statement should be removed. It is inappropriate for several reasons. First, the “objectives” (as stated earlier in the document) are arbitrary and unscientific. Second, there may be reasons other than grazing which are causing an area to fail to meet or move toward standards (the Utah Range Health Standards – not the objectives). Third, removal of livestock may or may not be necessary to achieve and upward trend toward meeting standards. Fourth, removal of livestock from an allotment may cause unnecessary harm to the viability of the permittee’s operation and unnecessary economic impact to Kane County. Fifth, non-use, if extended over a significant time period, will likely result in a deterioration of fences, waters, and other improvements due to lack of maintenance. This action is only intended to facilitate the eventual elimination of livestock grazing on GSENM.

Comment Excerpt Text:

Reference areas: Ungrazed areas are vital for understanding the impacts of grazing. I have an intimate understanding of areas that were never grazed, stopped being grazed a long time ago, stopped being grazed recently and still are grazed. Soil type makes a huge difference in recovery from grazing. Eolian areas recover faster. Alluvial soils less so and Clay based soils the least. Wetter years have a better effect. The alluvial soils become weedy with tumbleweeds and ragweed thus take longer to recover. Riparian canyon bottoms can recover quickly and begin to accumulate sediments as soon as grazing is stopped.

- The bench under Egypt between 25-mile and Harris Wash was retired in 1993 and has gone from shrubs Sand Sage etc. to mainly grass. Each year seems to build up the grassland.
- Big Bowns Bench was retired around 8(?) years ago and is slowly improving in the eolian areas but not so much in the Kayenta soils. The brush is being crowded by grasses and Bighorn Sheep have moved into the Cliff Spring area on the South end and along the river cliffs. This bench should remain ungrazed and used as a reference.

- Retiring Little Bowns, Wolverine and King Bench would tie in with Rattlesnake and Steep Creek Benches to create a corridor from Egypt to Boulder Mountain.
- Brigham Tea Bench was rested for two seasons and the grass in the eolian areas increased nicely and illustrates the beneficial aspects of interrupted grazing.
- The bench between Sand Hollow and The Gulch is severely overgrazed and looks like the inside of a corral.
- The Gulch below the road is so severely grazed that the alluvial benches support nothing but prickly pear tumbleweed and snakeweed. Cows are left to return to Boulder on their own usually in June and cows regularly go back out to Deer Creek, The Draw and The Gulch to forage in early summer when they have nothing to eat in Boulder.
- The upper Gulch above the road and connecting to the Circle Cliffs is severely eroded and has a year around herd of cows, both feral and branded. The vast alluvial benches above the stream and side drainages are covered almost exclusively by decadent Sagebrush. Hikers from Boulder complain of the upper Gulch stinking of cattle all summer. All summer growth is clipped continuously. Grazing in the entire Gulch is contrary to the huge recreation use of the canyon.
- The Circle Cliffs north has deep alluvial soil that used to have "endless grass up to a horse's belly" according to the old timers who were in Boulder when I moved here. Thousands of sheep and cattle before the Taylor Grazing Act reduced it to barren soils and deep gullies that drained water tables. Extensive damming and reseeding were done but failed and keep failing when repaired because the area was never rested from grazing. A few years ago a large reseeding was done but it failed for 3 reasons: drought, a Jackrabbit explosion and I observed groups of cows even though it was supposed to be rested. This area is largely in bad shape and needs to recover before it should be grazed again. This would benefit the grassland for grazing. A large area in the north Circle Cliffs should be retired as a reference area in alluvial soils.
- The Circle Cliffs south (the Moodys) has also never recovered from overgrazing and because of the sensitive soils should not be grazed. It is not appropriate for the monument to allow an area to be so abused that snakeweed is the predominant plant.
- The Escalante River corridor was retired and the change is dramatic and remarkable. Grass now dominates the banks and sediment has increased the bottom land by feet. Flood waters are slowed by the growth so that sediment drops out and fertilizes and builds soil which in turn makes more growth. The dry river terraces have become covered in dry land grasses so thickly that the sand is hardly visible.
- Cottonwood Canyon above Deer Creek always had huge sandy floods that impacted our irrigation diversion. Its drainage area begins on Lookout Point on Boulder Mountain and includes vast areas of Navaho sandstone slick rock. Unbelievably what used to be a rocky barren wash has completely been filled with willows and grass that slows the floods and filters out almost all the sand. This area should be studied as a prime example a healthy riparian wash and used as a reference.

Section 5.4 - Alternative D

Comment Excerpt Text:

Alternative D includes the goal to "manage livestock grazing to meet or make progress towards meeting rangeland health standards" suggests that this alternative may provide for "Allowable Use" where such standards are not met. There should be no "Allowable Use" where rangeland health standards have not been met or assessed; those conditions leave Alternative B as the only viable alternative.

Comment Excerpt Text:

Alternative D Offers the best balance of tools for BLM, Recreation, and Ranching. It provides opportunity to work toward environmental and rangeland health. It provides tools to reduce conflict between grazing and recreation. Most importantly it protects the rights and custom, culture, history, and heritage that makes southern Utah great.

Comment Excerpt Text:

If overgrazing has been a significant factor in the degradation of many parts of the Monument, as considerable evidence indicates, intensifying grazing cannot improve the situation.

Comment Excerpt Text:

With the ability to properly manage permitted grazing allotments by allowance of timely access to grazing features such as water and fencing and some variance of season of use, rangeland health may be improved through grazing.

Section 5.5 - Alternative E**Comment Excerpt Text:**

Alternative E includes the goal to “manage livestock grazing to meet or make progress towards meeting rangeland health standards” suggests that this alternative may provide for “Allowable Use” where such standards are not met. There should be no “Allowable Use” where rangeland health standards have not been met or assessed; those conditions leave Alternative B as the only viable alternative.

Comment Excerpt Text:

Clarification needed: Current text reads: In the Livestock Grazing section of Alternative E, the first objective (p. 55) states, “Meet or make progress towards meeting rangeland health standards where grazing is a causal factor.”

Recommended change: We are not entirely sure what to recommend here, as the above sentence is unclear. Does the BLM mean to say that it is an objective to meet or make progress towards meeting rangeland health standards only in allotments where grazing has been determined to be a causal factor in an allotment not meeting Standards? Wouldn't it be an objective to always be meeting the Standards all time, everywhere? We ask that this part of Alternative E is fixed.

SECTION 6 - GSENM OBJECTS AND VALUES**Comment Excerpt Text:**

All of the Alternatives exhibit a basic assumption that grazing will have negative impacts on the “objects and values” for which GSENM was established and that reduction or elimination of grazing will provide improved protection. This is an invalid assumption since it fails to recognize that the issue is not grazing vs. no grazing, but how the grazing will be managed complement other uses and values in GSENM.

Comment Excerpt Text:

Contrary to popular local opinion, the Monument Proclamation did not place grazing on a par with scientific and scenic objects and values. It did not contain language that guarantees perpetual grazing at the current or an increased level. Those who quote the passage from the Proclamation that seems to indicate the contrary, have actually made quotes out of context by omitting part of the quoted statement and sentence that references the fact that Federal strictures still apply. The recent December 2014 Letter to the Editor of the Southern Utah News makes this very clear.

Comment Excerpt Text:

the Presidential Proclamation establishing the Monument recognized three specific objects as the purpose for the Monument designation: geologic, paleontological, and archaeological. The pre-proclamation documents strongly supported continued grazing. That said our question is why has this alternative development process expanded the list of objects without any conceivable authority to do so? It is our understanding that to consider objects beyond scope of the proclamation then use these “objects” as a purpose to reduce, prohibit or excludes livestock grazing contravenes the provisions provided under the Antiquities Act and supersedes Presidential powers

Comment Excerpt Text:

Documents developed by the Secretary of the Interior preparatory to the Presidential Proclamation establishing the Monument clearly identify three specific types of objects: geologic, paleontological, and archaeological. However, it appears BLM's initial analysis and alternative development process has expanded the list of objects, possibly in an arbitrary and capricious manner. Garfield County objects to alternatives which consider objects beyond a plain reading of the Proclamation. Equally evident in the pre-proclamation documents is a strong emphasis on continued grazing. And the Proclamation specifically excludes livestock grazing from the protective provisions provided by President Clinton's exercise of executive powers. We therefore object to an expansion of objects to include "objects and values" that are not in strict conformity with the intent of the Proclamation. For example, if "rich human history" is considered an object or value protected by the Monument and/or the National Landscape Conservation System, we assert existing livestock grazing is part of that "rich human history" which continues to create history by its ongoing nature. Consequently, it would need to be an object/value that is protected. Additionally, if archaeological resources are expanded to consider cultural resources, ethnographic resources are also one subset of cultural resources that are to be protected by federal agencies. Garfield County, Kane County and the State of Utah have identified livestock grazing in the Monument as a) a cultural resource of historic significance and b) an ethnographic resource. A land-use planning process that considers impacts to cultural resources would then be required to appropriately analyze the impacts on livestock grazing as a cultural resource. We request that the objects to the protected be clearly identified for all of the alternatives and be consistent throughout.

Comment Excerpt Text:

These "alternatives" go against the very proclamation designed to protect the Grand Staircase Escalante National Monument, as well as the ranchers who have made their living by grazing cattle there for over a hundred years.

Comment Excerpt Text:

The proclamation signed by President Clinton establishing the monument states that it was set aside for “protecting the objects” identified in the proclamation, which includes cultural resources (rock art panels, occupations sites, campsites, and granaries, among other things) and biological resources (warm and cold desert floras, hanging gardens, tinajas, canyon bottom and dunal pocket communities, relict grasslands, pinyon-juniper communities, cryptobiotic crusts, endemic plants, and their pollinators). Since the protection of these “objects” was the reason for the creation of the monument, management should be focused primarily on doing exactly that.

Comment Excerpt Text:

I would like to see livestock grazing halted in the monument because I think that the protection of the objects in the proclamation and grazing livestock are mutually exclusive because the biological resources in the monument have been so degraded by more than a hundred years of heavy use.

Comment Excerpt Text:

Based upon BLM statements, the state anticipates the outcome of this planning process will lead BLM to maintain and improve rangeland health while upholding the objects and values contained within the Monument, yet the BLM's written documents fail to support this view.

Section 6.1 - Alternative A**Comment Excerpt Text:**

Furthermore, the Proclamation recognizes the value and critical importance of cryptobiotic crusts for nourishment of plants and for soil stabilization, but the current management of the Monument does not address protection of this fragile resource at all.

Comment Excerpt Text:

I realize that Alternative A (No Action) is provided as a baseline to compare the other actions to, but based on what I've seen, current management falls far short of protecting the objects for which the monument was established.

Section 6.2 - Alternative B**Comment Excerpt Text:**

I don't think our Monument should be sacrificed, but should be protected and restored in line with the values of GSNM to protect the geology, cultural resources, vegetation, soils, and unique ecosystems. The impacts of grazing are counter to these values.

Section 6.3 - Alternative C**Comment Excerpt Text:**

Alternative C may include management of cattle grazing that "restores the objects and values of the Proclamation and the values and purposes of Glen Canyon NRA". No "Allowable Us" should be permitted wherever assessments have not been completed, condition has been determined to be less than satisfactory, riparian areas are not in pfc, or values need to be restored.

Comment Excerpt Text:

In accordance with my values as a stakeholder, it is my opinion that Grand Staircase Escalante National Monument be managed in accordance with the language in its proclamation. Currently many of the values of the monument stated in that language are not protected under management as is.

Section 6.4 - Alternative D**Comment Excerpt Text:**

any alternative that proposes to reduce livestock grazing levels that existed prior to the Proclamation, or that proposes to alter the policy regarding livestock grazing that is not BLM policy on grazing on all other BLM lands, is not consistent with the Proclamation and should not be considered. That being the case, only alternative D is consistent with the Proclamation.

Comment Excerpt Text:

Access to undeveloped natural landscapes such as these were one of the primary justifications for the Monument's Proclamation. Such areas are an increasingly dwindling resource in the modern world, and the GSENM is a treasure in this regard. Why then should livestock grazing, which is ubiquitous across BLM lands in the West and can and has demonstrably degraded natural landscapes in many places, be considered the highest management value for Primitive and Outback Zones?

Comment Excerpt Text:

The monument was established because the area is truly remarkable and of national significance. Livestock grazing happens across the West, so it does not need special treatment in this monument, which appears to be the intent of Alternative D. The monument proposal does not include “the historic and cultural importance of the livestock industry” as an object to be protected, and as a matter of fact it doesn’t mention that at all. Given that the proclamation remains silent on that issue, I suggest that Alternative D be dropped.

Comment Excerpt Text:

The Proclamation clearly states that grazing is a protected activity on the Monument. That is not up to the interpretation of a solicitor or the desires of a special interest group. It is plain and simple. Grazing is a grandfathered activity.

Section 6.5 - Alternative E**Comment Excerpt Text:**

Following are specific comments on Alt E management actions: With the Action Statement at the bottom of page 60, there needs to be some clarification on the purposes of “experimentation of grazing techniques and grazing practices.” It seems that experimentation must be consistent with protecting objects and values or be a benefit to rangeland health. If the second sentence in this Action is the qualifying statement then please start the sentence with the word "such." (Such approved research-related experiments ...”

SECTION 7 - GCNRA VALUES AND PURPOSES**Comment Excerpt Text:**

The objectives stated for Alternatives A, C, D, and E, are reasonable so long as “protect” recognizes that some adverse effects will occur for some resources and values when any land use or management is applied. For example, there may be adverse effects in corrals or at water troughs where livestock impact is high, just as there are adverse effects of recreational use in parking lots, campgrounds, trails, etc. V&P must be defined and defended by fact-based science and cannot be arbitrary and capricious.

Comment Excerpt Text:

NPCA recommends several changes in order to more clearly define intent for BLM and NPS coordination as well as differences in management requirements for each agency. On P. 14 of the Draft Alternatives regarding the Glen Canyon NRA Grazing Management Plan, we recommend changing the second paragraph to “The BLM, in coordination with and approval from the NPS, will use resource goals and objectives in determining annual use levels to adjust the season of use or the number of animals as applicable.”

Comment Excerpt Text:

Many of the objectives and actions within the draft alternatives specify separate guidelines for the NRA, but there are several instances where it is not clear if or how a specific objective, action, or allowable use may need to be addressed differently within the NRA in close coordination with the NPS. One example from each of the alternatives is with regard to voluntary relinquishment of an allotment and the various actions that may be taken as a result. How that may be addressed differently inside the NRA needs to be clarified within the alternatives.

Another example from Alternatives D and E relates to designating forage reserves inside the NRA. It is not clear how forage reserves would be considered differently inside the monument and whether the allotment (or portion of) would first need to be evaluated for potential impacts to values and purposes before being designated a forage reserve. This needs to be clarified in each of those alternatives.

Comment Excerpt Text:

It is not clear how the BLM determined which allotments to close and which would remain open within the NRA in the various alternatives. There is no indication that an accurate assessment of rangeland health along with an assessment of impacts to the values and purposes from livestock grazing within GCNRA were incorporated into developing the alternatives. In our scoping comments, we stated that the BLM needs to ensure that currently grazed allotments within GCNRA are meeting grazing standards and not damaging or impairing NRA values, purpose and resources. In order to determine this, the BLM, in partnership with the NPS, needs to analyze all relevant data for the current condition of open allotments inside GCNRA. NPCA urges the BLM to ensure that scientifically based decisions are made in terms of where grazing is appropriate inside the NRA and how permits will be managed and monitored in partnership with the NPS for the protection and preservation of NRA values and purposes. We ask the BLM to clarify the decision making process for identifying specific allotments within GCNRA as open or closed in the various draft alternatives.

Comment Excerpt Text:

Current text reads: In the section on Glen Canyon NRA Vegetation Actions, at the top of page 15 of the Alternatives document, it states. “7. Establish grazing exclosures in key areas through consultation with the BLM to determine long term effects and recovery from livestock grazing, as well as how climate affects species growth and abundance.”

Recommended change: “Establish large grazing exclosures in each representative Range Site Type (as defined by the NRCS Ecological Site Descriptions) in the Monument, in consultation with the BLM, to determine long term effects and recovery from livestock grazing, as well as how climate affects species growth and abundance. The new exclosures will be a minimum of ten acres in size, at watershed scale. Closed allotments that are near potential may also be used as references.

Rationale: The current wording is far too vague. There are specifics on reference areas and grazing exclosures in Alternative C, and these need to apply to all alternatives when it comes to an issue as important as reference areas on National Park Service lands, especially one where the current management plan emphasizes the role of both science and adaptive management. Moreover, most current grazing exclosures, where they do exist in the NRA, are either too small or poorly maintained (or both) to really serve their intended role in either research or adaptive management.

Section 7.3 - Alternative C**Comment Excerpt Text:**

Alternative C may include management of cattle grazing that “restores the objects and values of the Proclamation and the values and purposes of Glen Canyon NRA”. No “Allowable Us” should be permitted wherever assessments have not been completed, condition has been determined to be less than satisfactory, riparian areas are not in pfc, or values need to be restored.

SECTION 8 - RECREATION - GRAZING CONFLICTS**Comment Excerpt Text:**

Grazing is not compatible with recreation. Recreation should take precedence over grazing.

Comment Excerpt Text:

Recreation GSENM There seems to be no substantive difference among the alternatives (except B). Each would seek to minimize conflicts between grazing and recreation by either limiting livestock access to recreational sites and/or minimizing impact of range improvements on recreational use.

Comment Excerpt Text:

Areas with extensive slickrock are poor rangeland and of little value to ranchers. However, these are the places that are most heavily used by outdoor recreationists. I suspect that conservation organizations would provide funding for buying out these areas and provide fencing that would allow livestock to continue to graze on adjacent benches having better quality rangeland. Buy-outs would be particularly beneficial in popular recreation areas such as Peekaboo and Spooky slot canyons and Little Death Hollow. Both of these areas have had problems with livestock getting trapped in slot canyons, making life difficult for recreationists and ranchers, not to mention the poor cows. Other sensitive areas such as riparian zones are good candidates for buy-outs.

Comment Excerpt Text:

In order to integrate historic grazing use with tourism that began upon creation of the Monument, allowing fencing, hiker mazes, or other methods to reduce conflicts are reasonable actions. Fencing of day use areas should be considered a BLM responsibility and not at permittee cost.

Comment Excerpt Text:

Conflicts between recreation and livestock grazing in front country and passage zones be resolved on a case by case basis, emphasizing mutual benefit to both interests

Comment Excerpt Text:

Alternatives A, D, and E have some potential but also many flaws, such as: (1) Giving preference to recreation over grazing in front country zones; and (2) excluding riparian and other areas for grazing consideration in the evaluation process. All ideas should be on the table; and (3) your solution on voluntary relinquishment includes all proposed alternatives which is unacceptable because of the last action point, "amend or revise the land use plan to allocate forage to uses other than livestock grazing," which is arbitrary and vague.

Comment Excerpt Text:

I believe that we can eliminate a lot of conflict with recreationists by better distribution of livestock. New water and range improvements will allow us to pull livestock away from problem areas.

Comment Excerpt Text:

Current text reads: On p. 59 of Alternative E, it states, "In high use recreation areas, consider modifying grazing practices such as changing season of use or installing fences to reduce conflicts. Areas include the Escalante River, special management designations, slot canyons, hanging gardens, riparian areas, and other areas with constrained geology."

Recommended change: "In high use recreation areas, modify grazing practices such as changing season of use or installing fences to reduce conflicts. Areas include the Escalante River, special management designations, slot canyons, hanging gardens, riparian areas, and other areas with constrained geology."

Rationale: The current wording reads like reducing recreation conflicts and emphasizing visitor safety is an optional action. The changes needed in grazing management to accommodate high use recreation, which is one reason so many tourists visit the Monument, should be mandatory.

Section 8.2 - Alternative B**Comment Excerpt Text:**

Further as a tourist, I don't come to the Monument to see cows, they are highly distracting and an annoyance to my experience.

Section 8.3 - Alternative C**Comment Excerpt Text:**

there are several area where grazing should be ended due to extreme degradation of the resource or conflict with recreation. These are:

- Dry Fork Coyote Gulch
- Willow Gulch
- 50 Mile Gulch
- Davis Gulch
- The area east of the Dry Fork out to the Escalante River – including the Scorpion area, and Les George Point.

Comment Excerpt Text:

Willow, 50 Mile, and Davis Gulches are far more valuable for their recreational values. Keeping cows out of Willow will not be an easy thing, but it could be done with fencing across several gaps that allow access in order to avoid having another fence across a narrow flood prone stream channel. Even if such a fence were to be built, the only place where it would be feasible is too far downstream to be meaningful, and too much of the upper reaches of the canyon would remain open. A rockfall may prevent access down the main south branch of the canyon and avoid the need for a fence there. 50 Mile could be closed with a fence across the channel, keeping in mind that it will be subject to flooding and will have to be maintained. Davis Gulch can just be left alone. It is doubtful that any cattle will find their way down the slickrock trail into the canyon on their own.

Comment Excerpt Text:

Place a priority on recreation over grazing when the presence of cattle in riparian areas and hiking areas degrades the experience of travelers who come here from all over the world. Cattle need to be completely removed at all times of the year from such places such as Hackberry Canyon, Deer Creek, the Gulch, and similar areas where recreation occurs year round. An assessment of these areas of conflict needs to be included in the EIS. Policies that limit and remove cattle to support travel and tourism on the Monument need to be implemented.

Comment Excerpt Text:

The Monument receives regular reports from tourists whose experiences are negatively impacted by cattle ranching. Tourists have reported the decimation of landscapes, the pollution of water sources, and the poor condition of cows that have little to eat on the Monument. The EIS should assess these written and verbal reports and identify what can be done to mitigate the problems that are being reported. The EIS should develop a policy of collecting tourist reports on a regular basis and using them to modify grazing practices.

Comment Excerpt Text:

Grazing should be phased out where there are recreation conflicts.

Comment Excerpt Text:

If hiker documents damage to resources due to grazing, BLM will investigate the problem

Comment Excerpt Text:

Reference areas: Ungrazed areas are vital for understanding the impacts of grazing. I have an intimate understanding of areas that were never grazed, stopped being grazed a long time ago, stopped being grazed

recently and still are grazed. Soil type makes a huge difference in recovery from grazing. Eolian areas recover faster. Alluvial soils less so and Clay based soils the least. Wetter years have a better effect. The alluvial soils become weedy with tumbleweeds and ragweed thus take longer to recover. Riparian canyon bottoms can recover quickly and begin to accumulate sediments as soon as grazing is stopped.

- The bench under Egypt between 25-mile and Harris Wash was retired in 1993 and has gone from shrubs Sand Sage etc. to mainly grass. Each year seems to build up the grassland.
- Big Bowns Bench was retired around 8(?) years ago and is slowly improving in the eolian areas but not so much in the Kayenta soils. The brush is being crowded by grasses and Bighorn Sheep have moved into the Cliff Spring area on the South end and along the river cliffs. This bench should remain ungrazed and used as a reference.
- Retiring Little Bowns, Wolverine and King Bench would tie in with Rattlesnake and Steep Creek Benches to create a corridor from Egypt to Boulder Mountain.
- Brigham Tea Bench was rested for two seasons and the grass in the eolian areas increased nicely and illustrates the beneficial aspects of interrupted grazing.
- The bench between Sand Hollow and The Gulch is severely overgrazed and looks like the inside of a corral.
- The Gulch below the road is so severely grazed that the alluvial benches support nothing but prickly pear tumbleweed and snakeweed. Cows are left to return to Boulder on their own usually in June and cows regularly go back out to Deer Creek, The Draw and The Gulch to forage in early summer when they have nothing to eat in Boulder.
- The upper Gulch above the road and connecting to the Circle Cliffs is severely eroded and has a year around herd of cows, both feral and branded. The vast alluvial benches above the stream and side drainages are covered almost exclusively by decadent Sagebrush. Hikers from Boulder complain of the upper Gulch stinking of cattle all summer. All summer growth is clipped continuously. Grazing in the entire Gulch is contrary to the huge recreation use of the canyon.
- The Circle Cliffs north has deep alluvial soil that used to have "endless grass up to a horses belly" according to the old timers who were in Boulder when I moved here. Thousands of sheep and cattle before the Taylor Grazing Act reduced it to barren soils and deep gullies that drained water tables. Extensive damming and reseeding were done but failed and keep failing when repaired because the area was never rested from grazing. A few years ago a large reseeding was done but it failed for 3 reasons: drought, a Jackrabbit explosion and I observed groups of cows even though it was supposed to be rested. This area is largely in bad shape and needs to recover before it should be grazed again. This would benefit the grassland for grazing. A large area in the north Circle Cliffs should be retired as a reference area in alluvial soils.
- The Circle Cliffs south (the Moodys) has also never recovered from overgrazing and because of the sensitive soils should not be grazed. It is not appropriate for the monument to allow an area to be so abused that snakeweed is the predominant plant.
- The Escalante River corridor was retired and the change is dramatic and remarkable. Grass now dominates the banks and sediment has increased the bottom land by feet. Floods waters are slowed by the growth so that sediment drops out and fertilizes and builds soil which in turn makes more growth. The dry river terraces have become covered in dry land grasses so thickly that the sand is hardly visible.

- Cottonwood Canyon above Deer Creek always had huge sandy floods that impacted our irrigation diversion. Its drainage area begins on Lookout Point on Boulder Mountain and includes vast areas of Navaho sandstone slick rock. Unbelievably what used to be a rocky barren wash has completely been filled with willows and grass that slows the floods and filters out almost all the sand. This area should be studied as a prime example a healthy riparian wash and used as a reference.

Section 8.4 - Alternative D

Comment Excerpt Text:

Alternative D Offers the best balance of tools for BLM, Recreation, and Ranching. It provides opportunity to work toward environmental and rangeland health. It provides tools to reduce conflict between grazing and recreation. Most importantly it protects the rights and custom, culture, history, and heritage that makes southern Utah great.

Comment Excerpt Text:

Specific concerns on Alt D management actions are as follows: Alt D encourages the use of machinery to clear thousands of acres of P-J, even in Primitive Zones. Alt D does not allow the voluntary relinquishment of grazing permits and the conversion to forage reserves or reduce grazing/recreation conflicts.

Comment Excerpt Text:

In the recreation section of Alternative D, it talks about giving preference to recreation in the front country and passage zones. This could be a conflict by water troughs and corrals that are next to a road. I would like to see signs put in place asking people to camp away from corrals and water troughs to eliminate this conflict.

Section 8.5 - Alternative E

Comment Excerpt Text:

Following are specific comments on Alt E management actions: Add a phrase to the Action Statement on top of page 59 to state, "...to minimize livestock/recreation conflicts and enhance visitor experiences." With just "minimum size" as the only criteria, a fence two feet from the campsite perimeter would be sufficient to separate livestock from visitors but cause a terrible visitor experience.

SECTION 9 - SOILS

Comment Excerpt Text:

Biological Soil Crust

The statement under Alt A is acceptable if modified to state "to avoid significant impacts". Almost any human or animal activity will have some impact on crusts. The issue of significance should be determined by science based predictions of the effects on ecosystem function or achievement of rangeland health objectives on a landscape scale. The prescriptions to protect crusts from trampling within 60 % of their predicted habitat in GSENM and 80% in GCRA are arbitrary and lack scientific validity. Strictly interpreted they would exclude larger species of wildlife and human activity with those areas as well as livestock grazing.

Additionally, many areas where soil crusts are prevalent, other vegetation used by livestock is not present and would not be suitable for livestock grazing.

Comment Excerpt Text:

Page 16 Soils "The evolutionary and ecological processes of the soil..." Please define an "evolutionary process" in soil? Soils change over time in response to climatic patterns and biotic effects (plants, animals) but that is not

“evolution” as used to describe genetic selections in plant and animal populations. This statement does not make much sense from a scientific standpoint.

Comment Excerpt Text:

Page 17 GCNRA Soils Objective 2

Enhance soil productivity by promoting “deposition” of sufficient cover and litter...? Please define types of “cover” will be “deposited” other than litter.

Section 9.1 - Alternative A

Comment Excerpt Text:

Page 28 Objective

The overall objectives include a statement to “ensure that the health and distribution of fragile biological crusts is maintained or improved.” Can we assume that since this is specific to “fragile” crusts that there are some “nonfragile crusts”? If management, including grazing management, results in improved cover of perennial vegetation and litter, then crust cover will decline. That is not consistent with the objective to maintain or improve the distribution of crusts.

Section 9.3 - Alternative C

Comment Excerpt Text:

More of the biotic crust soils should be protected, at least 60 % of the area

Comment Excerpt Text:

biological soil crusts should be protected.

Comment Excerpt Text:

Protect the all-important and fragile biocrusts in a larger area

Comment Excerpt Text:

While Alternative C addresses protection of biological soil crusts, I would encourage that this be made more robust through standards for measuring and assessing soil crust health with consequent actions to remediate it taken when the health of the soil crust is compromised.

Comment Excerpt Text:

The plan should establish standards for the protection of biological soil crusts.

Comment Excerpt Text:

Protection of biological soil crust from trampling by large ungulates (and vehicles and foot traffic in specific areas!) must be a priority. Specific criteria for rest from grazing should be established in regard to the condition of soil crusts.

Comment Excerpt Text:

Protect biological soil crust

Comment Excerpt Text:

Page 43 Soils Goal

“Maintain the evolutionary and ecological processes...” This statement is basically meaningless. Soils do not “evolve” in the sense that living organisms do. It would be better to state the objective to “protect to the extent possible accelerated erosion and/or loss of productivity of the soil.”

Comment Excerpt Text:

Page 33-34 Objective

“In GSENM ... soils exhibit...” Here again the initial statement is all that is necessary. The bulleted items are arbitrary and subject to misuse. The requirement of 80% (again) of soil cover compared to ungrazed sites is artificial. It is possible that both the grazed and ungrazed sites have insufficient cover to protect the soil, or even that grazed sites exceed the cover on ungrazed sites. If the cover on ungrazed is less than 80% of that on grazed sites, what action will be taken? How will the “predicted available habitat” for soil crusts be done? Will it take into account that occurrence of biotic crusts may decline on some sites if vascular plant cover and/or litter increase as a result of grazing management or range improvements? Why is the allowable percentage of soil crusts lower in GSENM than in Glen Canyon NRA? Apparently 80% cover is not required to meet range health standards? How was that determined? Biological soil crusts are not “also known as cryptobiotic soils. These are lower forms of plant life on and within the soil, not soils per se.

Comment Excerpt Text:

Reference areas: Ungrazed areas are vital for understanding the impacts of grazing. I have an intimate understanding of areas that were never grazed, stopped being grazed a long time ago, stopped being grazed recently and still are grazed. Soil type makes a huge difference in recovery from grazing. Eolian areas recover faster. Alluvial soils less so and Clay based soils the least. Wetter years have a better effect. The alluvial soils become weedy with tumbleweeds and ragweed thus take longer to recover. Riparian canyon bottoms can recover quickly and begin to accumulate sediments as soon as grazing is stopped.

- The bench under Egypt between 25-mile and Harris Wash was retired in 1993 and has gone from shrubs Sand Sage etc. to mainly grass. Each year seems to build up the grassland.
- Big Bowns Bench was retired around 8(?) years ago and is slowly improving in the eolian areas but not so much in the Kayenta soils. The brush is being crowded by grasses and Bighorn Sheep have moved into the Cliff Spring area on the South end and along the river cliffs. This bench should remain ungrazed and used as a reference.
- Retiring Little Bowns, Wolverine and King Bench would tie in with Rattlesnake and Steep Creek Benches to create a corridor from Egypt to Boulder Mountain.
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- The Circle Cliffs south (the Moodys) has also never recovered from overgrazing and because of the sensitive soils should not be grazed. It is not appropriate for the monument to allow an area to be so abused that snakeweed is the predominant plant.
- The Escalante River corridor was retired and the change is dramatic and remarkable. Grass now dominates the banks and sediment has increased the bottom land by feet. Floods waters are slowed by the growth so that sediment drops out and fertilizes and builds soil which in turn makes more growth. The dry river terraces have become covered in dry land grasses so thickly that the sand is hardly visible.
- Cottonwood Canyon above Deer Creek always had huge sandy floods that impacted our irrigation diversion. Its drainage area begins on Lookout Point on Boulder Mountain and includes vast areas of Navaho sandstone slick rock. Unbelievably what used to be a rocky barren wash has completely been filled with willows and grass that slows the floods and filters out almost all the sand. This area should be studied as a prime example a healthy riparian wash and used as a reference.

Comment Excerpt Text:

Alternative C addresses the protection of biological soil crusts, which is important for overall ecosystem health, however Alternatives D and E do not address how to mitigate impacts on biological soil crusts from livestock grazing.

Comment Excerpt Text:

Developing indicators of excessive erosion of soils is a sensible measurement of rangeland health. High resolution GIS monitoring would provide an effective and efficient way to measure these variables.

Section 9.5 - Alternative E

Comment Excerpt Text:

Soil crusts are vital to the health of the area and must be protected; include a process for soil crust protection

Comment Excerpt Text:

Further, neither for BLM lands nor NPS lands is there any objective for biological soil crust.

Comment Excerpt Text:

Alternative E is missing important language that is adequately covered in other alternatives, such as Alternative C. For example, Alternative E is completely silent on the issue of biocrust and proposed grazing utilization rates. As currently written, Alternative E will not lead to an improvement to the degraded resources that the BLM admits occur in this National Monument.

Comment Excerpt Text:

BLM's Alternative E does not have a program to recover biocrust or restore native plant communities and their production to potential. The agency's choice of Alternative E in the final decision will perpetuate resource impairment, making it, for all practical purposes, permanent.

SECTION 10 - VEGETATION TREATMENTS - GENERAL**Comment Excerpt Text:**

We need to be able to use mechanical means to clear brush or trees. We need to be able to use aerial, chemical, and mechanical means.

Comment Excerpt Text:

Prevent changing the Monument Management Plan to allow destroying more sagebrush to plant exotic grasses

Comment Excerpt Text:

Furthermore: the MMP states that "management activities will not be allowed to ... disrupt the normal progression of native plant associations." The alterations in plant community composition caused by overgrazing, such as replacement of palatable or grazing-intolerant plant species by unpalatable or grazing-tolerant ones, and replacement of cool-season grasses by warm-season grasses, are completely unlike the alterations caused by natural disturbances. Therefore, plant communities altered by livestock grazing are not part of the "natural range of native plant associations" required by the Monument Plan.

Comment Excerpt Text:

prevent changing the Monument Management Plan to allow destroying sagebrush to plant exotic grasses for cattle

Comment Excerpt Text:

The guidelines under Alternatives A, B and C state no land treatments including prescribed fire, are based on the false assumption that this will result in reaching the desired goals for restoring the "natural" ecosystem. The only alternative consistent with science and practical management is Alternative D. And Alternative D should also remove the prohibition on mechanical treatments.

Comment Excerpt Text:

"...eradicate tamarisk and Russian olive...." This should be an objective common to all alternatives, not only Alternative D.

Comment Excerpt Text:

Alt A (MMP) places excessive restriction on treatments that make it ineffective and/or uneconomical to apply some treatments. Alt B places misguided faith that doing nothing will achieve the range health and other objective for the Monument. It is not clear why the descriptions presented for Alternatives C, D, and E should not be the same. Passive restoration and non-chemical methods would be the first priority if they will achieve the desired results. However, if these techniques will not achieve the desired rangeland health and other

objectives, at least within reasonable time frames, other methods should be considered, recognizing that not all methods are appropriate on all sites, and not all are equally cost effective.

Comment Excerpt Text:

The description of livestock grazing practices after a land treatment for Alternatives A, C, D, and E are virtually the same and should be stated the same to avoid the impression that there are any major differences.

Comment Excerpt Text:

Do not allow vegetation "treatments" to take place anywhere on the monument.

Comment Excerpt Text:

Current text reads: In the section on Glen Canyon NRA Vegetation Actions at the bottom of page 15 of the Alternatives document, it states, "For key riparian reaches in high priority or non-M[aintenance] allotments, maintain populations of all native species and specific conditions detailed below." The word "key" is used twice in the five following objectives/actions. Recommended change: "For all riparian reaches in high priority or non-M[aintenance] allotments, maintain populations of all native species and specific conditions detailed below." In addition, we would ask that the next two times the word "key" is used (in numbers 1. and 2.) in the following objectives/actions, these also be changed to "all."

Rationale: The word "key" is not defined, and in this context is so vague that it is meaningless.

Section 10.3 - Alternative C

Comment Excerpt Text:

Essential to this sound alternative would be the requirement that changes in grazing systems be considered before implementation of mechanical treatments and/or more fencing.

Comment Excerpt Text:

I believe that Alternative C is narrow-minded and will ultimately end in the removal of grazing on the monument. In many ways this plan is impractical, for example "The permittee(s) will manually maintain an area free of all invasive, exotic plant species within a 100-foot radius of a watering trough or watering pond."

I am completely in favor of removing noxious weeds on GSENM. But to ask permittees to hand pull all the weeds around all their water is ridiculous. Can you imagine pulling all the weeds in a 100 foot perimeter around a one acre pond? The task would be monumental - those weeds have had decades to become entrenched. To consider making ranchers maintain all ponds and water troughs in such a manner is irresponsible.

Comment Excerpt Text:

The current practice of removing sagebrush and replacing it with non-native species for grazing should be ceased and other policies should also be in accordance with current conservation science which, itself, should be nurtured within the monument.

Comment Excerpt Text:

If water is required for livestock, permittee will manually maintain an area free of all invasive, exotic plant species within 100 foot radius of the watering trough or pond.

Comment Excerpt Text:

No mechanical treatment of the environment should occur, such as eliminating pinyon pines or junipers, nor should exotic taxa be re-seeded, especially not in primitive areas so far untreated.

Comment Excerpt Text:

Do not allow further encroachment or changes in the MMP in regards to increased vegetation seedings and treatments for forage

Comment Excerpt Text:

no sagebrush or other native vegetation removal

Comment Excerpt Text:

Do not allow destruction of sagebrush and pinyon/juniper; do not plant exotic grasses for cattle grazing (except in a very rare emergency situation)

Comment Excerpt Text:

Discontinue the vegetation treatments on & around archeological sites

Comment Excerpt Text:

Please abandon the effort to open the GSENM Management Plan for increasing vegetation seeding & treatment for livestock forage

Comment Excerpt Text:

And finally, there must be no more destruction of sagebrush, pinyon, and juniper in order to create more cow pasture.

Comment Excerpt Text:

Additionally chaining and other mechanical vegetation treatments should be discontinued. While the removal of junipers might in fact increase the spread of forbs and grasses, weather conditions for re-establishment have to be perfect which is extremely hard to predict.

Comment Excerpt Text:

Revegetation projects must use NATIVE plants, which were what appealed to the cattle in the first place.

Comment Excerpt Text:

Page 41-42 Objective I. Vegetation Actions

The numbered items in the “updated decision” provide a series of rules to govern grazing management. These are arbitrary and not consistent with good range management or adaptive management. Maximum utilization rate of 45% implies this will be a rigid standard not to be exceeded, rather than an average value over years. Use of one “standard” regardless of species, season of use, or other localized issues is not valid. Setting a “utilization” standard of 25% for spring use is inappropriate without specifying the basis for it, and that the utilization will be measured after completion of the growing season (the only time annual production can be estimated). The statements about meeting potential vegetation, etc. are unnecessary because such issues are fully and more accurately addressed in Utah Standards and Guidelines.

Comment Excerpt Text:

The Sustainable Grazing Alternative (at C.16) includes a provision on resting post-treatment or post-fire areas from grazing that contains two measurable conditions:

In post-treatment areas, suspend livestock grazing [1] for at least 2 growing seasons or [2] until the majority of native plant species in the area have seeded, whichever is longer.

In contrast, the preliminary Alternative C contains no such measurable conditions:

The livestock exclusion period required to allow establishment of seeded native species and recovery of surviving plants after a wildfire may be more than 2 years. Site evaluation will be required to determine when the native seedlings should be grazed again and the effectiveness of the current or new grazing system on the persistence of native plants.

What will constitute “establishment” of seeded species, “recovery” of surviving plants, or “persistence” of native plants is not clear and is not independently-measurable.

We propose that the Sustainable Grazing Alternative provision be included in Alternative C with the following addition (underlined phrase)

Livestock grazing after native seeding restoration will be modified to ensure the survival of the native plants. In post-disturbance areas such as natural fire or vegetation treatments, suspend livestock grazing for at least 2 growing seasons or until the majority of native plant species in the area have seeded, whichever is longer.

The Sustainable Grazing Alternative phrase “until the majority of native plants have seeded” provides a quantitative, independently-measurable condition of native plants lacking in the preliminary Alternative C phrases, “establishment”, “recovery,” and “persistence,”

Comment Excerpt Text:

- stop destruction of sagebrush stop planting exotic plants

Comment Excerpt Text:

I also think it is completely inappropriate for the Monument to be removing sagebrush and planting exotic grass species as forage for cows.

Comment Excerpt Text:

- Also, to prevent changing the Monument Management Plan to allow destroying more sagebrush to plant exotic grasses for cattle

Comment Excerpt Text:

Alternative C assumes that resting, or removing livestock grazing from large portions of sagebrush steppe habitat would reverse or restore native plant communities. BLM must also consider that this belief may be incorrect, as mechanical rangeland treatments and intensive grazing management have been shown to be the most effective tools to combat exotic annual grasses and western juniper encroachment.[6] It is not realistic that an entire Alternative in a grazing management EIS should be based on this type of inaccurate information.

Section 10.4 - Alternative D

Comment Excerpt Text:

Implement vegetation treatments in dense pinyon-juniper and decadent sagebrush stands to improve understory composition. Use species that are known to successfully establish and provide stability to the ecological site. This includes nonnatives that are affordable and available.

Comment Excerpt Text:

Specific concerns on Alt D management actions are as follows: Alt D encourages the use of machinery to clear thousands of acres of P-J, even in Primitive Zones. Alt D does not allow the voluntary relinquishment of grazing permits and the conversion to forage reserves or reduce grazing/recreation conflicts.

Comment Excerpt Text:

Page 52 Action

“Restore shrublands and grasslands... to pre-1850 conditions....” Drop the term “pre 1850 conditions” and just say that pinyon–juniper will be managed to meet rangeland health and resource management goals. No one really knows what pre-1850 conditions were or whether those conditions, if known, are necessarily capable of being “restored” or even desirable in all cases.

Comment Excerpt Text:

We also strongly object to continued conventional treatment of vegetation including removal of native vegetation by mechanical and chemical methods.

Comment Excerpt Text:

On numerous occasions I have heard BLM personnel refer to such native species as Pinyon, Juniper, and Sage as “invasive species”, which suggests they are undesirable on the whole, when in fact they are only spreading or residing in some of the pastures. We object to such terminology. In fact, these species are native to the Monument and serve as habitat for native wildlife, including endangered species. They have simply expanded (not invaded) areas where conditions are favorable for their survival. The true invasive, non-native species are the cattle and other livestock who were introduced around 150 years ago and rapidly denuded the landscape through overgrazing, thus allowing the rapid introduction of true “invasive” nonnative plant species.

Comment Excerpt Text:

Initiate vegetation treatments aimed at returning rangeland conditions to “pre-1850 conditions”. This is either a serious typo or simply reflects gross ignorance concerning the history of this part of the Colorado Plateau. No credible information exists regarding pre-1850 conditions on the Monument – the first cursory scientific observations of the Powell Survey expeditions did not occur until the 1870s!

Comment Excerpt Text:

Would loosen the conditions required of areas being restored following severe disturbance, especially fire. The new language would place less emphasis on recovering native species and more on simple forage availability (including exotic grasses) before allowing grazing to resume. This is a step backwards and away from the general mandate of promoting the restoration of natural vegetation communities.

Comment Excerpt Text:

Would utilize herbicides, including aerial spraying, to control both native (e.g., sagebrush; oakbrush) and invasive species. This is a risky proposition and should only be approved after other, less problematic methods of controlling undesirable vegetation (esp. exotic invasives) have been tried. These would necessarily include better control of livestock-related impacts.

Comment Excerpt Text:

Improve diversity in monoculture pinyon-juniper or sagebrush areas by implementing chaining, roller chopper, mastication and seeding.

Section 10.5 - Alternative E**Comment Excerpt Text:**

Implement vegetation treatments in dense pinyon-juniper and decadent sagebrush stands to improve understory composition. Use species that are known to successfully establish and provide stability to the ecological site. This includes nonnatives that are affordable and available.

Comment Excerpt Text:

Amendment to NAT-5: The current MMP at NAT-5 states, “Non-native plants will not be used to increase forage for livestock and wildlife.” MMP at 30. The amended plan would create an exception to this policy by allowing for non-natives for livestock or wildlife forage when BLM is maintaining or restoring seedings for their intended purpose (Preliminary Alternatives at 59).

Setting species standards for seedings for ungulate forage differently than for other types of vegetation management projects will lead to an inefficient and often counterproductive management regime in direct violation of the Monument proclamation. Broadening the use of non-native species in the Monument for increased livestock forage conflicts with and favors a use that is not a listed Monument object of interest (i.e., seedings for livestock or wildlife forage) over uses listed as a Monument object of interest (e.g., retention and proliferation of naturalness and native species).

Given the large discrepancies between permitted AUMs and Actual Use AUMs in the Monument, the available palatable native vegetation apparently is unable to support the permitted AUMs. This would appear to be the underlying push by Preliminary Alternative E to “Maintain and/or restore [seedings] with native and nonnative species.” This amounts to an agricultural transformation of the Monument into non-native cattle pasture for the purpose of maintaining or increasing private cattle AUMs.

When estimating the “production” of forage within the Monument, it will be extremely important to separate estimates of production occurring in the Monument where cattle regularly graze from production occurring in areas lightly or not used by cattle due to inaccessibility or unavailability for grazing. Similarly, it will be important to distinguish production of native “forage” vegetation from production of non-native (generally seedings) vegetation. Seedings artificially increase vegetation production specifically for support of cattle AUMs. As native species are often preferentially utilized by cattle, the seeding of non-natives can further diminish the presence of native species, which are a stated value to be protected within the Proclamation and Monument Management Plan. 211

Table 1. Appropriate and inappropriate analysis of forage production
 Appropriate Analysis: Map and separate production estimates in areas regularly used by cattle from areas occasionally or not used by cattle (e.g., inaccessibility, rarely- used grass bank areas, unavailable areas)
 Inappropriate Analysis: Estimate production without regard to whether it is regularly or rarely used by cattle

Appropriate Analysis: Separate estimates of production of native vegetation consumed by cattle as forage from production of non-native seedings for cattle.
 Inappropriate Analysis: Estimate production without regard to whether it is native or non-native seedings.

Appropriate Analysis: Indicate the species that are being considered as “forage” in the estimates of production
 Inappropriate Analysis: Which species are being considered as cattle “forage” are not identified in the estimates of production

Recommendations: a. The proclamation clearly states that “existing grazing uses shall continue to be governed by applicable laws and regulations other than this proclamation.” First, there is no law or regulation requiring the use of non-native species for grazing forage. Second, the proclamation is clear that the Monument’s natural state and natural species as listed should take precedence over uses that are not listed objects of interest and that conflict with or harm listed objects. Further, use of non-native species is not needed for existing grazing uses, as evidenced by the fact that the MMP has been in effect disallowing non-native species for forage since February 2000. Thus, since the use of non-native species for increased forage conflicts directly with the mandates of the proclamation and is not needed for existing grazing uses or required by law, BLM must not adopt the proposed language in the preliminary alternatives, which would reverse the MMP’s current prohibition of such activity.

b. Actual Use AUMs should be commensurate with the amount of native vegetation available for grazing of both domestic and wild ungulates and retention of native diversity, wildlife habitat, and functional biological soil crust.

Comment Excerpt Text:

The current MMP provides for restrictions on the use of chainings and other mechanized treatments for the purposes of protecting Monument resources. These restrictions include a direct ban on chaining pinyon-juniper communities and other prescriptions for limiting chainings elsewhere where Monument resources may be damaged. The amendments to the MMP propose to lift these restrictions and broaden the scope of chainings and other harmful mechanized treatments without putting protection of Monument objects resources first and providing little protection for such resources in future management. These provisions violate the language and intent of the proclamation.

Amendments to equipment selection prescriptions: BLM proposes amending RM-1 and RM-2 of the MMP to allow for a vast expansion of chaining and other uses of mechanized and/or motorized equipment for vegetation management projects, including in the Primitive Zone of the Monument. The MMP currently prohibits chaining to remove pinyon and juniper because of the harm it causes to Monument resources. MMP at 26, RM-2. Outside of pinyon-juniper treatments, chaining is only permitted where the BLM finds:

- noxious weeds and invasive non-native species are presenting a significant threat to Monument resources or watershed damage could occur if the burned area is not reseeded,
- it can be demonstrated that Monument resources will not be detrimentally affected (i.e., completion of a full archaeological, paleontological, threatened and endangered species and other resource clearance and consultation),
- it is determined that seed cover is necessary for the growth of the native species proposed for seeding, and
- other surface disturbing measures of covering seed are not available or cannot be applied in a timely manner.

In addition, the current MMP directs that “[v]isual impacts of chaining will also be minimized near routes and other points of concern by covering the native seed mix with harrows or light chains.” Id.

We understand that in some cases chaining might be less disruptive (e.g., to biological soil crust) than the less visually obvious use of harrows, but using any mechanical treatment to maintain or increase non-native seedings

or to create livestock or wildlife forage where it has been depleted or insufficient to support current numbers of livestock is contrary to the intent and wording of the proclamation and Monument Management Plan.

The proposed amendments in the preliminary alternatives simply states, "Allow the use of machinery (e.g., roller chopping, chaining, bull hogging, discing, plowing) in existing seedings, including seedings in the Primitive Zone." (Preliminary Alternatives at 59). This is clearly inconsistent with the monument proclamation.

Recommendations: The proposed prescriptions for equipment selection for vegetation treatments are in many ways counter to the mandates of the proclamation, which requires BLM to protect the objects of interest in the Monument as their first priority. BLM should seek to avoid all damaging impacts on Monument resources, values, and/or objects of interest. The burden must remain on the agency to ensure that management actions will protect Monument values by prioritizing the objects of interest as listed in the Monument proclamation.

The MMP provides BLM with a good starting place by recognizing the harm caused to Monument values by chaining and setting out guidelines for when this practice may be appropriate or inappropriate. BLM should retain the language of the MMP prohibiting chaining in the Monument unless certain conditions are met to ensure that Monument values are protected.

Comment Excerpt Text:

Alternative E's proposal to manage seedings for both ecosystem processes and forage production is unrealistic. Alternative E would essentially perpetuate the same livestock management on the Monument that has led to degraded conditions in seedings.

SECTION II - WATER RESOURCES

Comment Excerpt Text:

One of the problem I see is salting 1/2 mile from water. My water is on the edges of my allotment barely through the fence. With the only roads going to water I only have one place on a road that is 1/2 mile away from water. Most of the water is in a trough from a pipeline. There ought to be exception where this is the case and not a riparian area.

Comment Excerpt Text:

Tanking springs should not be considered the solution to keeping cattle out of riparian areas and is not an "improvement".

Comment Excerpt Text:

One, all water sources should be protected, either from direct degradation of riparian areas by cows and/or downstream impacts such as sedimentation from erosion caused by the destruction of soil crusts and the reduction of vegetation.

Comment Excerpt Text:

The requirement in all alternatives that water development no "dewater" streams and springs is arbitrary. The following questions should be resolved in the Plan amendment. Does this mean reduce total discharge, average discharge, or the period of flow? Does it apply to average years, dry years or wet years? Does this requirement comply with water rights established by the State of Utah?

Comment Excerpt Text:

Page 17 GCNRA Water Quality Objective 1

“...water quantity and quality... will not be degraded.” Define degraded. If it means in comparison to a “standard” define the “standard.” If it means that the quality parameters listed will not change from present conditions, this should be stated, and present standards should be defined.

Comment Excerpt Text:

Page 17 GCNRA Water Quality Objective 2

Utah State standards? Does it refer to drinking, full body contact or something less?

Comment Excerpt Text:

Page 17 GCNRA Water Quality Objective 4

“Maintain integrity...” Define integrity. Does maintain mean that integrity currently exists? What is the meaning of integrity in this usage? What does it have to do with water quality?

Comment Excerpt Text:

Address the protection of water resources in each alternative by requiring mandatory improvements to water developments in order to protect riparian resources, and clarify how water quality will be protected in each alternative.

Section 11.3 - Alternative C**Comment Excerpt Text:**

Cows should not be allowed in any of the Escalante River tributaries, like Harris Wash.

Comment Excerpt Text:

The prohibition of all grazing on tributary canyons of the Escalante River, especially east of the Hole in the Rock Road and the Burr Trail.

Comment Excerpt Text:

Alt. C does at least provide for ungrazed reference areas, but I see no indication of science related to cows contribution to climate change or changing climate implications for land & waterways.

Comment Excerpt Text:

Alt C provides for the most protection for the fragile riparian areas of the Monument area including but not limited to: Paria, Escalante, Cottonwood Creek, Gulch, and Deer Creek.

Comment Excerpt Text:

Add the following sentence at the end of the 3rd Action on Page 37 to ensure that unused water remains in its natural course during the grazing season, “Use float valves on tanks during the grazing season so that unused water also remains in its natural course/site.”

Comment Excerpt Text:

Page 43 Water Quality Objective 5

What is meant by “natural and unaltered” condition? If shrub encroachment has resulted in increased or decreased water yield is that natural?

Comment Excerpt Text:

Page 32 Objective

“GSENM and Glen Canyon NRA are in compliance...” All that is necessary here is to state that BLM lands will be managed to meet Utah state water quality standards for designated uses. The bullet statements below should be removed as they are ill defined, arbitrary and do not relate to those standards.

“Macro-invertebrate community.... Within 80 percent of reference...” How would that be measured? Define the 80% figure.

“Fine sediments do not exceed 80%....of equivalent ungrazed stream.” Define the 80% figure. If the sediment content meets Utah water quality standards, there should be no additional requirement added. Define when, where and how would this measurement be taken.

Comment Excerpt Text:

Page 33 Objective

“GSENM and Glen Canyon NRA riparian and wetland...” The first paragraph is all that is needed – it reflects Utah Standards of Range Health. The bulleted sections are arbitrary, lack scientific basis and are subject to misuse. Again the 80% figure is uniformly used regardless of the subject and is completely arbitrary. In this case, the statements apparently mean (although the wording is confusing) that 80% of the locations in which PFC is determined will show properly functioning condition or progress toward PFC? This implies a complete inventory of all riparian areas or a random sampling of all possible areas, and that this evaluation be repeated over time to establish trends.

Comment Excerpt Text:

An Action item would fence water developments to protect associated wetland/riparian resources. If the time and timing principles are employed in this alternative, then fencing would not be necessary for protection of these resources.

Section 11.4 - Alternative D**Comment Excerpt Text:**

Page 53 Action

“Install shut off valves...” This statement needs to be modified to insure that a decision to turn off water to a water development will take into consideration the relative benefits to wildlife and effective management of the pasture compared to possible effects on the riparian area. “Dewatering” should be defined, i.e. for what period and/or linear extent is to be considered.

Section 11.5 - Alternative E**Comment Excerpt Text:**

maintenance of water developments using heavy equipment currently must undergo NEPA and be consistent with plan objectives. Alternative E proposes to jettison all of these protections. The purpose of this EIS is to provide direction for livestock management on an NLCS unit, not reduce protections for other resources.

Comment Excerpt Text:

Current text reads: On p. 62 of Alternative E it states, “In GSENM and Glen Canyon NRA install shut-off valves on any new water development and consider their installation during routine maintenance of existing water

developments. Shut-off valves allow the water collection system to be shut off when not needed or to protect the riparian area from dewatering.”

Recommended change: “In GSENM and Glen Canyon NRA install shut-off valves on any new water development and install them during routine maintenance of existing water developments. Shut-off valves allow the water collection system to be shut off when not needed or to protect the riparian area from dewatering.”

Comment Excerpt Text:

Current text reads: On p. 62 of Alternative E it states, “In GSENM and Glen Canyon NRA during routine maintenance of existing water developments, consider installing float valves in water troughs to allow unneeded water to remain in the riparian area. In situations where float valves are not feasible, consider overflows to return unused water to the riparian area.”

Recommended change: “In GSENM and Glen Canyon NRA during routine maintenance of existing water developments, install float valves in water troughs to allow unneeded water to remain in the riparian area. In situations where float valves are not feasible, consider overflows to return unused water to the riparian area.”

SECTION 12 - SCIENCE

Comment Excerpt Text:

There is much emphasis on studying and monitoring the response of vegetation and soil to no grazing. Alternative B essentially would set aside the whole GSENM for that purpose. Alternative C would set aside 20% of the GSENM (451,000 acres) for “reference areas”, and Alternative D would set aside up to 0.5% (10-11,000 acres for reference areas). Alt E also calls for reference areas although the amount is not specified. Kane County supports the establishment and monitoring of some reference areas to provide baseline data for ecological studies. The prescription under Alternative D seems to be sufficient.

Comment Excerpt Text:

we believe that the opportunity for scientific study related to resource management, i.e. looking at different and innovative ways of grazing management and range treatments is better under Alternatives A, D, and E than under C and worst under Alternative B. We support the concept of inventory and monitoring plans to support management to achieve goals on both GSENM and Glen Canyon NRA, although we question whether such activities are properly identified as “science.”

Comment Excerpt Text:

The alternatives fail to implement science into the process. For instance, the alternatives that the BLM will realistically seriously consider fail to implement the most basic range management science, such as utilization rates or stocking determinations. Further, the common to all alternatives fails to provide any implementation of current science regarding biological soil crust. Again, the BLM fails to comply with its own direction.

Section 12.2 - Alternative B

Comment Excerpt Text:

I would argue that this proposal is not a good idea from a science perspective. Suddenly terminating grazing across the Monument forfeits the valuable lessons that could be learned by being able to carefully compare, over the long-term, the impacts of grazing relative to those that are ungrazed in close proximity (i.e., those included in Alternative C).

Section 12.3 - Alternative C**Comment Excerpt Text:**

Enclosed ungrazed areas should be part of each grazing permit for comparison of impacts.

Comment Excerpt Text:

Alt. C does at least provide for ungrazed reference areas, but I see no indication of science related to cows contribution to climate change or changing climate implications for land & waterways.

Comment Excerpt Text:

Action should be taken now to limit the impacts of grazing. However, the management should be adaptive. Research should be initiated concurrent with the changes to evaluate the impacts of the timing and intensity of grazing.

Comment Excerpt Text:

Build small and large (as appropriate) exclosures to study the impact of cattle grazing in numerous varied environments

Comment Excerpt Text:

Objectives for 80% of the area to mimic "reference areas" would be difficult to measure and monitor.

Comment Excerpt Text:

Page 35 Objective

“Establish ungrazed areas...” Kane County has no objection to the establishment of ungrazed areas representing a range of ecological sites. However, an arbitrary figure of 20% of the entire GSENM (over 450,000 acres) is far beyond what would be required to serve as useful reference areas for grazing management or research (especially considering that large areas of ungrazed land already exist within the area). There is no range research station in the United States that comes anywhere close to this much acreage. This is nothing more than an effort to reduce grazing on GSENM in violation of the Proclamation. Elimination of grazing on an area this size would have a significant negative impact on the viability of ranches dependent on GSENM and on the economy of Kane County.

Comment Excerpt Text:

Page 38-39 Action

“Reference Areas.” This alternative places an inordinate emphasis on so called “reference areas”, including recommendations for vast areas to be set aside for such purposes. While grazing exclosures can provide some useful information, there are a number of reasons why they can be not useful or misused. These were addressed under “Science” on pages 5 and 6 and will not be repeated here.

Comment Excerpt Text:

Page 41 Science and Research

The issues of science and research (is there a difference?) and especially the objective of emphasizing large ungrazed reference areas has been addressed elsewhere and will not be repeated here (e.g. see page 5). The objective for grazing management on GSENM is not science and research, but the use of monitoring as a basis for adaptive management.

Comment Excerpt Text:

Moreover, one striking aspect of the founding of the GSENM was the promise that it would offer a special opportunity to bring new and original science to bear on the important questions attached to the management of such a large, rugged and spectacular landscape. It was to create, in part, a “living laboratory” in which science and science-based land management, including livestock grazing, would take center-stage. But although there have been some significant scientific studies on the Monument over the years, including those recently aimed at clarifying the importance of biological soil crusts to ecosystem health, I know of no clear evidence that any of these studies have actually informed the Monument’s approach to grazing. Alternative C would change that.

Comment Excerpt Text:

Alternative C would address this fundamental limitation by establishing reference areas in which both abiotic and biotic elements of the local ecosystem would be set aside for long-term protection against grazing (and other) pressure. These areas would be expected to improve over time and offer valuable data on the actual, proximate reference conditions by which to judge the impacts of livestock grazing and to inform management decisions. These same reference areas would also contribute data relating to how specific ecosystem types (soil and vegetation) within the Monument respond to the absence of grazing pressure and the dynamics of their recovery (e.g., pattern of vegetation change, time course, etc.). These recoveries are likely to be determined in large part by local conditions and cannot be accurately predicated by proxies such as the NRCS ecological sites. One important reason why those proxies are not likely to be reliable predictors of the restoration trajectory of any particular site is that, as already mentioned, they do not incorporate management history, nor do they take into account new factors that will influence that trajectory (e.g., climate change). Thus, self-assembling local reference areas will offer the best yardstick by which to determine the true ecological potential of an adjacent grazed area and how management protocols impact that potential.

Comment Excerpt Text:

An additional issue that is becoming increasingly apparent is that given such factors as climate change, alterations in soil properties (including microbial components) induced by long-term anthropogenic impacts and the presence of numerous introduced exotic species, historical reference conditions may not be useful guides for restoring (or managing) future ecosystems. Instead, the reality may be the emergence of new, hybrid ecosystems. Owing to such uncertainties, large protected reference areas may be one of the most reliable strategies for illustrating what healthy landscapes will look like under current and future real world conditions.

Comment Excerpt Text:

There must be a science driven process to determine what GSENM lands are capable and suitable for livestock grazing and make adjustments accordingly.

Comment Excerpt Text:

The objective to manage plant communities may involve monitoring grazed and ungrazed areas. BLM should note that potential differences between these areas may not show up for at least 10 years. Monitoring should also include additional measures and considerations (i.e. precipitation levels, wildlife grazing, matching range sites, etc.) to separate impacts of livestock grazing from additional events and conditions.

Comment Excerpt Text:

It is unclear how BLM will determine a “... sufficient size, number and ecological site diversity to compare grazed areas to ungrazed areas to measure progress toward meeting or achieving objectives for native plant communities, riparian and wetland areas and soils.”[7] These enclosures or reference areas may have fencing that will be detrimental to livestock movement and rotations which this very same alternative is promoting.

Section 12.4 - Alternative D**Comment Excerpt Text:**

The GSENM is to be aggressively managed as a showcase model for responsible management on other BLM and federal lands. Science would be used as a guide in the adaptive management methods used, to both restore the Monument lands to optimum, historical productivity, and for potential maximum future production for all planned legitimate uses of these lands.

Comment Excerpt Text:

Only implement research if needed. Do not re-invent something that is already addressed. There is plenty of research showing grazing relations with vegetation, and use of native vs. non-native species.

Comment Excerpt Text:

Page 52-53 Science and Research

As was commented upon in Alternative C, there seems to be some confusion about “science and research” and the collection of data to support adaptive management decisions. BLM is not a research organization. Scientific research can be conducted on GSENM as it can on all BLM lands, but that is not the purpose of the monument. Trying different approaches to grazing management and monitoring the results is a way to accumulate information but seldom truly can be called scientific research, e.g. research that is replicated and statistically analyzed and suitable for publication.

Comment Excerpt Text:

Use of science and research as a means to achieve land health standards should be a cooperative and coordinated activity with the UDAF and our land grant universities. Funding from other sources to research many aspects of grazing could prove very beneficial. As long as it doesn't involve science with an agenda driven outcome, we would support this as a very valuable effort.

Comment Excerpt Text:

While the Monument is designated as a laboratory for scientific research, it was not intended to be a laboratory for researching “innovative grazing techniques” as is included in Alternatives D and E. Much research has already been done (see incorporated GCT/TWS comments) and the science speaks loudly for change in the way the Monument is currently managing livestock grazing. Using this irreplaceable landscape and its resources for “experiments” to attempt to allow continued grazing is not consistent with the Monument proclamation. Today's conditions in the Monument indicate a failure by BLM to apply science to management decisions, to hold permittees accountable for degradation and permit violations, to respond to public input, to include the public in livestock management decisions, to meet existing rangeland health standards, and to protect Monument resources. BLM should manage in ways that are proven to reduce impacts and improve land health, not to undertake potentially destructive and risky “experiments” regarding livestock grazing.

Comment Excerpt Text:

The Action item to use current and future science and proven methods to enhance rangelands should be more specific upon which areas would utilize mechanical improvements. The presumption would be to apply these methods to pinyon-juniper stands.

Section 12.5 - Alternative E

Comment Excerpt Text:

While the Monument is designated as a laboratory for scientific research, it was not intended to be a laboratory for researching “innovative grazing techniques” as is included in Alternatives D and E. Much research has already been done (see incorporated GCT/TWS comments) and the science speaks loudly for change in the way the Monument is currently managing livestock grazing. Using this irreplaceable landscape and its resources for “experiments” to attempt to allow continued grazing is not consistent with the Monument proclamation. Today’s conditions in the Monument indicate a failure by BLM to apply science to management decisions, to hold permittees accountable for degradation and permit violations, to respond to public input, to include the public in livestock management decisions, to meet existing rangeland health standards, and to protect Monument resources. BLM should manage in ways that are proven to reduce impacts and improve land health, not to undertake potentially destructive and risky “experiments” regarding livestock grazing.

SECTION 15 - IMPACTS

Section 15.1 - Livestock Grazing - General

Comment Excerpt Text:

Voluntary retirement of pastures may result in fewer acres grazed.

Comment Excerpt Text:

The resources we all use are heavily impacted by private livestock grazing, from water quality and quantity to air quality to biodiversity and archaeological sites.

Comment Excerpt Text:

I do not see all the problems the Monument is experiencing today as having existed before the cattle industry arrived here. The clear and only cause for these problems can be attributed to the ranching industry.

Comment Excerpt Text:

The ensuing need to develop infrastructure to promote land usage

- Installing wells, water tanks, underground piping
- Diverting valuable resources from maintaining a healthy eco system
- Creating trash, debris, and site damage within the GSENM, much of it in an abandoned state
- Roads
- Many that have no practical application

Comment Excerpt Text:

Allowing access and further penetration into more remote areas for OHV vehicles that go off road and create further damage

Difficult to maintain because of cattle traversing road ways

Comment Excerpt Text:

Structures that are unsightly, not needed and usually in states of disrepair or disuse

Comment Excerpt Text:

The requirement in Alt C that waters be shut off when livestock are not in a pasture will not adversely affect livestock, but may have adverse consequences for wildlife that use these waters.

Comment Excerpt Text:

The alternatives fail to consider possible adverse effects of not grazing. For example, increased fire hazard due to fuel accumulation may have adverse effects on some objects. Also, the presence of permittees may help to reduce vandalism, poaching and other harmful human actions within GSENM. Objects and values need to be defined and justified using fact-based science as objects and values and fact-based science that livestock grazing is detrimental to the objects and values.

Comment Excerpt Text:

I value undisturbed natural lands. I do not value disruption by ORV's or airplanes or logging trucks or cattle ranching or mining or drilling.

Don't get me wrong, these things may have their place—but the National Monument area is not that place.

Please work for reducing cattle access, reducing ORV access, and eliminating drilling and mining because its effects cannot be eliminated in our lifetimes.

Comment Excerpt Text:

Each year in the summer during the monsoon season, the floods cleanse the canyon of almost all traces of the cattle that wintered there. The yearly rain, floods, and the subsequent natural erosion, by far, do more to change the existing landscape than our cattle do.

Comment Excerpt Text:

All alternative shall assess the cumulative impacts of livestock along with all other impacts including global warming.

Section 15.2 - Livestock Grazing - AUMs and Other Forage**Comment Excerpt Text:**

A lower allowance of consumption of grasses by cattle – more preservation of native vegetation.

4. A reduced level of allowable degradation.

Comment Excerpt Text:

Restoration of native species should increase wildlife populations and may even allow for higher levels of animal units in some allotments, once ecological stability and balance is restored.

Comment Excerpt Text:

While Alternative E is an improvement over current management, it still places undue importance on livestock grazing, allows grazing on too many acres of the monument (more than 90 percent), aggressive management actions to support grazing (tearing up piñon-juniper forests to increase forage), allows planting non-native plants, and the use of herbicides. In addition, utilization of forage by livestock (60 percent) is too high for the arid Southwest, as shown by numerous studies. It is critically important that the EIS carefully examine utilization rates and justify the choice that is included in the livestock grazing plan.

Comment Excerpt Text:

Numbers of livestock exceed the available forage and carrying capacity of the land.

Comment Excerpt Text:

A failure by the BLM in its RMP to analyze utilization, stocking rates and precipitation would be a failure to meet NEPA requirements for analysis. The failure to provide sustainable utilization rates for upland and riparian area herbaceous vegetation, aspen suckers and riparian shrubs and incorporate those into grazing permits as terms and conditions leaves management uncontrolled and subject to bias, violating FLPMA.

Section 15.3 - Livestock Grazing - Grazing Management Practices**Comment Excerpt Text:**

Seeding with nonnative vegetation that upon failure increases substantial erosion

Comment Excerpt Text:

Stop wasting taxpayer dollars on failing restoration projects. Restoration seeding is expensive, and based on observations, more than half of the projects fail to meet their objective, often turning into wastelands inhabited largely by sagebrush. The EIS needs to include a full assessment of the results of past seeding projects, and a disclosure of the costs of these projects to the taxpayer.

Comment Excerpt Text:

There has been little or no action to modify and improve grazing practices and standards on the Monument for nearly 20 years. This has led to both documented and undoubtedly undocumented damage to significant resources throughout the Monument, whose protection and preservation is mandated by Federal Law.

Comment Excerpt Text:

Implementation of Alternative D would require a fairly massive investment in new or up-graded infrastructure.

Section 15.4 - Livestock Grazing - Rangeland Health**Comment Excerpt Text:**

I particularly like the involvement of science to study grazing areas (closed & open) to figure out the positive & negative effects on both.

Comment Excerpt Text:

I believe that alternate D is far superior to the others. It protects the rights of the cattleman, strives for rangeland health, resolves conflict between grazing and recreation, and more.

Comment Excerpt Text:

Chaining land that may take centuries to recover with a very low measurable return

- I.E. Camp Flat off smoky Mt. Road

Comment Excerpt Text:

over the past thirty years I have observed conditions in the Monument area which can under no stretch of the imagination be regarded as “good practices,” “care for the land,” “rangeland improvement” or any such euphemism. These include large areas of blackbrush desert and sandblow in the lower Escalante benchlands where the loss of soil crusts from trampling by livestock makes it almost impossible for native grasses and forbs to get a toehold. I have seen waterholes in remote canyons befouled into uselessness by cattle. Large areas continue to be dominated by weedy species.

Comment Excerpt Text:

The over growth of pinyon and juniper trees are causing the grasses to disappear, vast erosion to occur and an ever greater problem of wildfires.

Comment Excerpt Text:

There have been many studies done that show how proper grazing will INCREASE the health of the land.

Comment Excerpt Text:

The land in question here would stagnate and lose productivity if this alternative is approved.

Comment Excerpt Text:

Please consider that the rangeland is much healthier as are the local surrounding communities more economically sustainable when grazing is supported and encouraged.

Comment Excerpt Text:

THE RANGELAND IS HEALTHIER WITH PROPER GRAZING. Grazing causes the plants to increase the growth of their roots. Therefore erosion is reduced with grazing. Without grazing, plants wither and die and erosion increases.

Section 15.5 - GSENM Objects and Values**Comment Excerpt Text:**

Livestock grazing is incompatible with the values of naturalness one expects in a national monument or recreation area.

Comment Excerpt Text:

Grazing is inconsistent with preservation of the unique natural environment of both the GSENM and the Glen Canyon NRA, and Alternative B is the only alternative that offers true protection for these precious lands.

Comment Excerpt Text:

Too many cattle on essentially arid lands is one of the key problems, and a predominance of cattle grazers' interests in management plans another. Thus, many of the values that led to the Proclamation establishing GSENM have disregarded or neglected.

Comment Excerpt Text:

For example, the "outstanding" biological resources" present in GSENM and its myriad of precious ecological niches for plants and wildlife which are cited in the Proclamation, are at present not adequately protected.

Comment Excerpt Text:

The alternatives fail to consider possible adverse effects of not grazing. For example, increased fire hazard due to fuel accumulation may have adverse effects on some objects. Also, the presence of permittees may help to reduce vandalism, poaching and other harmful human actions within GSENM. Objects and values need to be defined and justified using fact-based science as objects and values and fact-based science that livestock grazing is detrimental to the objects and values.

Comment Excerpt Text:

The Grand Staircase-Escalante National Monument was established, in part, to protect what the monument declaration called "perhaps the richest floristic region in the Intermountain West." At the same time, the declaration specified that livestock grazing would continue under "applicable laws and regulations other than this

proclamation.” I would hope that those laws and regulations would permit the BLM to begin a process of gradually but emphatically restoring the monument’s landscapes to true health, not continued maladaptation to the needs of large, exotic, and poorly managed herbivores.

Comment Excerpt Text:

One overarching quality highlighted in the proclamation that is at risk due to the proposed amendments to the Monument Management Plan (MMP) is that the “unspoiled natural area remains a frontier, where nature shapes human endeavors and where opportunities for biological and other scientific study remains high.” Many aspects of this natural landscape, also identified as objects of interest in the proclamation, will be affected by proposed amendments stated in Alternative E in the preliminary draft alternatives, including, but not limited to:

- Unusual and diverse soils
- Endemic plants and their pollinators
- Relict vegetation and grasslands
- Pinyon-juniper communities
- Fragile cryptobiotic crusts

Comment Excerpt Text:

Cultural resources are important objects that the designation of the monument is intended to protect.

Section 15.6 - GCNRA Values and Purposes

Comment Excerpt Text:

Livestock grazing is incompatible with the values of naturalness one expects in a national monument or recreation area.

Comment Excerpt Text:

Grazing is inconsistent with preservation of the unique natural environment of both the GSENM and the Glen Canyon NRA, and Alternative B is the only alternative that offers true protection for these precious lands.

Section 15.7 - Recreation-Grazing Conflicts

Comment Excerpt Text:

Grazing is not compatible with recreation. Recreation should take precedence over grazing.

Comment Excerpt Text:

I believe that it protects the custom and culture of the area, as well as offering the best options for management of grazing, recreation, and historic rights on the GSENM.

Comment Excerpt Text:

With increasing tourism it becomes even more important to maintain public lands in as healthy and presentable condition as possible. Over grazed land, stripped brush and trees, pollution to the waterways by cow manure, turned up stream banks by milling cattle, eroded trails, and maybe tastiest of all, dead cows in stream beds is not healthy or presentable.

Comment Excerpt Text:

I've seen the damage of cattle on delicate biological crust, and even encountered a dead cow in a slot canyon. We had rappelled several drops and there was no going back! It was pretty disgusting to get around the cow. There are a lot of slot canyoneer - dead cow encounters that are probably never reported.

Comment Excerpt Text:

I believe that alternate D is far superior to the others. It protects the rights of the cattleman, strives for rangeland health, resolves conflict between grazing and recreation, and more.

Comment Excerpt Text:

Additionally, since their inception, the world-class solitude and scenery afforded by GSENM and GCNRA have encouraged an increase in recreational activity. This activity brings significant economic benefit to the impacted communities, and yet mostly avoids widespread deleterious impact. I am concerned that extending grazing to additional areas, especially within GSENM and GCNRA, would degrade the recreational experience. Such degradation could short circuit the economic boon provided by recreation and tourism.

Comment Excerpt Text:

Place a priority on recreation over grazing when the presence of cattle in riparian areas and hiking areas degrades the experience of travelers who come here from all over the world. Cattle need to be completely removed at all times of the year from such places such as Hackberry Canyon, Deer Creek, the Gulch, and similar areas where recreation occurs year round. An assessment of these areas of conflict needs to be included in the EIS. Policies that limit and remove cattle to support travel and tourism on the Monument need to be implemented.

Comment Excerpt Text:

The Monument receives regular reports from tourists whose experiences are negatively impacted by cattle ranching. Tourists have reported the decimation of landscapes, the pollution of water sources, and the poor condition of cows that have little to eat on the Monument. The EIS should assess these written and verbal reports and identify what can be done to mitigate the problems that are being reported. The EIS should develop a policy of collecting tourist reports on a regular basis and using them to modify grazing practices.

Comment Excerpt Text:

The EIS should assess and estimate the lost opportunity dollar value associated with tourists having negative experiences on the Monument because of cattle grazing and subsequently not returning to the Monument or Kane County.

Comment Excerpt Text:

This alternative promises to be most objective in meeting all user needs, including the ranchers holding grazing permits.

Comment Excerpt Text:

visitor experience is frequently degraded by the presence of cattle and first hand observations of adverse effects of grazing.

Comment Excerpt Text:

In some cases, tourists truly enjoy seeing cattle and cowboys as part of their "western" experience. However, the effects of overgrazing on poorly managed grazing allotments has a very negative impact on recreationists' experiences in the GSENM. For example, notes in the trailhead register at The Gulch Outstanding Natural Area

commonly complain about the poor condition of this riparian corridor due cattle overgrazing, dead cattle lying in the streams polluting the water, and other associated problems. These tourists probably won't return to that area and won't recommend the GSENM to their friends. In contrast, since the acquisition of grazing allotments along the Escalante Canyon corridor, this popular tourist destination has shown an amazing recovery of native grasses, especially on benches located above the floodplain.

Comment Excerpt Text:

there are also times when grazing activities can undermine recreation (e.g., the recent event at Peek A-Boo Canyon).

Comment Excerpt Text:

It has been stated that some feel recreationalists and ranchers cannot co-exist. Yet it has been our experience that the hikers we come across are appreciative and grateful for our presence. Sometimes we have shared water with thirsty hikers, other times we have given directions to those who have lost their bearings. Still others have told us how much they appreciate our cows, as they would have had to spend the night, if they had not found one of our cattle trails, coming out of Lower Death Valley. We have also assisted travelers when they have become stuck in the mud or snow, and have guided many other travelers, to a much safer path, when their GPSs have led them astray.

Comment Excerpt Text:

Our allotment, in lower Hackberry, runs from October 15th to March 15th. In reality our cows are on the allotment when the majority of the recreationalists are NOT there. Most of our cattle stay on the plateaus during the winter and not in Hackberry Canyon. After it begins to freeze, Hackberry Canyon becomes inaccessible due to mud and ice dams.

Comment Excerpt Text:

Add to this mix the fact that recreation and tourism visitation to the Monument has significantly increased in recent years. GSENM is on the map in a big way now. Recreation users are coming into direct up-close personal conflicts with Cows. I hike in GESENM for a couple weeks every year. In 2007 my hiking partner and I encountered two dead cows a half mile apart after entering the narrow portion of Little Death Hollow. They were stinking, and visually and olfactory assaulting to the senses. The ultimate conflict was in the late fall of 2014 when a cow became stuck in the famous and heavily used Peek-A-Boo slot canyon. The cowboys had to kill the cow

Comment Excerpt Text:

There are also many reported crashes when vehicles at night collide with an errant cow. Some of these are extremely dangerous to the humans. (Plus the obvious further stress of having to pay the rancher for the dead cow under the open range laws!) Obviously this is a safety issue with higher visitation.

Comment Excerpt Text:

People who come to Southern Utah to experience the local culture benefit by learning that the rangeland is improved and healthier by allowing grazing. Those who come to Southern Utah to experience the Old West will welcome the remaining vestiges of cowboys and hardworking folks who make a living from the land. This is a unique perspective and should be promoted rather than erased from the National Monument.

Section 15.8 - Soils**Comment Excerpt Text:**

The benefits from grazing help a few individuals, while the negative effects on the ecosystem, including riparian areas and crusts, are lasting and pervasive.

Comment Excerpt Text:

Livestock, when they walk the desert floor, trample cryptogammic soil. This leads to erosion of the desert floor, forever altering the fragile ecosystem of the desert.

Comment Excerpt Text:

The current policy of maximizing grazing on public lands has resulted in erosion and damage to delicate soils and a marked reduction in native fauna. The stress of current grazing and a reduction in precipitation due to climate change is adding stress to an already stressed environment. A policy of lighter or no grazing on the allotments would allow for recovery of damaged areas.

Comment Excerpt Text:

I should also comment that biological soil crusts (which keep the very soils that livestock grazing relies upon from blowing away) are one of the values listed in the GSENM Proclamation. However, I have seen with my own eyes that these biological soil crusts are often heavily trampled and destroyed by cattle. The same goes for the seeps and springs that provide water in arid regions of GSENM.

Comment Excerpt Text:

Our studies on the biodiversity of insects in the monument have found a number of species, including some undescribed scientifically to be found in areas with cryptogammic crusts such as at Calf Creek. Other areas such as dunes, dry side washes, and others with native vegetation include many poorly understood or undescribed species. Areas regularly grazed by cattle seem dominated by impacted soil, invasive alien weedy annuals and grasses and are of reduced or limited scientific interest not to speak of making the areas more prone to fire episodes.

Comment Excerpt Text:

I believe that areas that have lost their soil crust protection may require many decades if not centuries for their recovery.

Comment Excerpt Text:

Destruction of biological soil crust, leading to a rapid depletion across all rangelands today

Comment Excerpt Text:

Creating wind erosion and dust production

Comment Excerpt Text:

Reduced ability of the soil to absorb and retain water

See: Neff et al. 2008; McConnell et al. 2007; Belnap et al. 2009; and Belnap and Gillette 1997; Bowker et al. 2008a, 2008b; Field et al. 2010; Li et al. 2007, 2008

Comment Excerpt Text:

The impact to the cryptobiotic soil is irrefutable and is evidenced by rapid erosion whenever there is a monsoon rain.

Comment Excerpt Text:

Across the Monument disturbance of micro biotic soil crust has made it nearly non existent

Comment Excerpt Text:

Soils in this region cannot be considered optimally productive if their normal structure is constantly being churned up and their surface eroded by wind and rain.

Comment Excerpt Text:

over the past thirty years I have observed conditions in the Monument area which can under no stretch of the imagination be regarded as “good practices,” “care for the land,” “rangeland improvement” or any such euphemism. These include large areas of blackbrush desert and sandblow in the lower Escalante benchlands where the loss of soil crusts from trampling by livestock makes it almost impossible for native grasses and forbs to get a foothold. I have seen waterholes in remote canyons befouled into uselessness by cattle. Large areas continue to be dominated by weedy species.

Comment Excerpt Text:

Soil erosion is a major concern, particularly where cryptobiotic soil crusts have been disturbed along cattle trails. Associate gullying can cause water tables to drop, resulting in the loss of riparian vegetation and loss of critical water sources for wildlife. With loss of ground cover, flash floods might be more intense and move more sediment.

Comment Excerpt Text:

THE RANGELAND IS HEALTHIER WITH PROPER GRAZING. Grazing causes the plants to increase the growth of their roots. Therefore erosion is reduced with grazing. Without grazing, plants wither and die and erosion increases.

Comment Excerpt Text:

the Monument itself admits that biocrust is incompatible with and impacted by grazing (page 35 of the draft alternatives document). Despite this, Alternatives D and E do not address how the Monument is going to mitigate the impacts of livestock grazing on biocrust.

Comment Excerpt Text:

BLM's Alternative E does not have a program to recover biocrust or restore native plant communities and their production to potential. The agency's choice of Alternative E in the final decision will perpetuate resource impairment, making it, for all practical purposes, permanent.

Comment Excerpt Text:

Other allotments are experiencing sever erosion from over grazing as we seen a number of times during the stream and riparian assessments when I was at the State Division of Water Quality. Since my retirement, we have visited many of these areas on a yearly basis for personal recreation, and I perceive no improvement in the grazing practices or maintenance of facilities. Other BLM and GSENM areas have made significant improvements as on the Buckskin Mountain high country, upper Johnson Canyon, Kanab Creek, and the BLM lands south of Panguitch.

Section 15.9 - Vegetation Treatments

Comment Excerpt Text:

I also like that Alt C will protect water sources from tramping & erosion by cattle and restoring native species (and not introducing more non-natives) without the use of chemicals. I also strongly agree w/ not allowing grazing in Buckskin & the Paria-Hackberry drainages.

Comment Excerpt Text:

Many factors have influenced the land over the years for good and bad. These landscapes need to be brought back into a healthy state by use of mechanical treatments in some areas. Wildfire has been suppressed for many years and some areas in the GSENM would greatly benefit from reintroduction of fire, both natural and prescribed.

Comment Excerpt Text:

Many areas in the GSENM are in poor health due to encroachment of Pinyon and Juniper trees. These trees are starving the bitterbrush, cliff rose and many other important plants of water in these dry climates. Over the past 40 years I have seen a decline in many of the shrub, forb, and grass species due to the increase of these trees. The GSENM needs the ability to use the tools they need to restore these lands to a healthier setting. Mechanical treatments, chemical treatments and Fire are good tools that have been used in the past with good success in restoring the rangelands.

Section 15.10 - Water Resources

Comment Excerpt Text:

I have personally witnessed the destruction of natural resources caused by grazing in the Deer Creek drainage and other areas of the GSENM.

Comment Excerpt Text:

I also like that Alt C will protect water sources from tramping & erosion by cattle and restoring native species (and not introducing more non-natives) without the use of chemicals. I also strongly agree w/ not allowing grazing in Buckskin & the Paria-Hackberry drainages.

Comment Excerpt Text:

I quote from Michael Ghiglieri's Canyon of 1992:

"74.4 percent of Colorado River water used in the US--and sold at 10% of its development cost--goes directly into maintaining roughly 15 million cows, the most expensive cows on this planet. ...In the West it takes 4,200 gallons of water to produce a pound of beef (compared to 300 gallons to grow the wheat to make a loaf of bread). The Colorado now feeds about 15% of America's 100 million cattle." [Note: these figures may be better or worst over 20 years since this book, but I would bet the proportions are about the same.]

Given our 15 year drought, despite the recent rains, it is simply foolish and also astonishing to me that the BLM wishes to encourage grazing of cattle. This is not only a Reclamation problem; this is THE main problem for the American Southwest. Federal policy should encourage the grazing of cattle in the Midwest and the East and Southeast, not in the water-dependent areas of low deserts and high plateaus with low precipitation in the Southwest.

Comment Excerpt Text:

I should also comment that biological soil crusts (which keep the very soils that livestock grazing relies upon from blowing away) are one of the values listed in the GSENM Proclamation. However, I have seen with my own

eyes that these biological soil crusts are often heavily trampled and destroyed by cattle. The same goes for the seeps and springs that provide water in arid regions of GSENM.

Comment Excerpt Text:

Coordination of wildlife and livestock impacts and their uses of vegetation and waters on the EIS planning area, are important and necessary. Alternative D allows the best opportunity for coordinated efforts to succeed.

Comment Excerpt Text:

No doubt, available water will largely control the future of all animals, and their use of these lands. Alternative D allows the most opportunities for development, use, and protection of this critical resource.

Comment Excerpt Text:

Impacting air quality, snow melt, water production, nutrient cycling, vegetation and contributing to climate change

Comment Excerpt Text:

Streams and springs choked with cattle waste and water unfit for human consumption

See: The NLCS GSENM Plan Implementation Review 2010 further documented this concern.

Comment Excerpt Text:

springs are hammered by cattle (evident by cattle prints and grazed/trampled riparian vegetation), other springs are tanked and completely eradicating the riparian ecosystem all together, and stream banks are incised.

Comment Excerpt Text:

Also, it is well documented that dust created by destabilized soils contributes to the early, detrimental melting of snow packs that are critical to our reservoirs and summer water supplies.

Comment Excerpt Text:

Studies have shown that cattle grazing without regulation—for that is basically where we are on this issue; Cliven Bundy has proven that beyond doubt—is the chief cause of desertification in North America. Most of our western lands have been stripped, through grazing, of native plant diversification; our springs, creeks and rivers have been polluted; and native birds and mammals have suffered.

Comment Excerpt Text:

Soil erosion is a major concern, particularly where cryptobiotic soil crusts have been disturbed along cattle trails. Associate gullying can cause water tables to drop, resulting in the loss of riparian vegetation and loss of critical water sources for wildlife. With loss of ground cover, flash floods might be more intense and move more sediment.

Comment Excerpt Text:

Another very important consideration is water distribution and ongoing development. Utah is the second driest state in the country, management of water resources is paramount to any type of land management decisions. In Utah, water is held under beneficial use in this case Stock Water Rights. That means if it is not used it cannot be held. Taking livestock off of allotments, placing them in nonuse for extended periods of time or reducing AUM's can result in a loss of water rights. That will dewater lands and create an adverse effect to wildlife in contravention of the MMP.

Section 15.11 - Science**Comment Excerpt Text:**

We don't need it in GSENM or GCNRA, which can serve as a scientific study the renewal of the landscape in the absence of livestock grazing.

Comment Excerpt Text:

I particularly like the involvement of science to study grazing areas (closed & open) to figure out the positive & negative effects on both.

Comment Excerpt Text:

Our studies on the biodiversity of insects in the monument have found a number of species, including some undescribed scientifically to be found in areas with cryptogamic crusts such as at Calf Creek. Other areas such as dunes, dry side washes, and others with native vegetation include many poorly understood or undescribed species. Areas regularly grazed by cattle seem dominated by impacted soil, invasive alien weedy annuals and grasses and are of reduced or limited scientific interest not to speak of making the areas more prone to fire episodes.

Comment Excerpt Text:

Important scenic and scientific resources are clearly suffering significant damage and destruction as a result of poorly regulated cattle grazing;

Comment Excerpt Text:

I would argue that this proposal is not a good idea from a science perspective. Suddenly terminating grazing across the Monument forfeits the valuable lessons that could be learned by being able to carefully compare, over the long-term, the impacts of grazing relative to those that are ungrazed in close proximity (i.e., those included in Alternative C).

Comment Excerpt Text:

These scientific experiments to reduce grazing and see what happens are unnecessary because they have already been done and show grazing is beneficial.

Section 15.12 - Air Quality**Comment Excerpt Text:**

Impacting air quality, snow melt, water production, nutrient cycling, vegetation and contributing to climate change

Section 15.13 - Biological/Ecological Resources**Comment Excerpt Text:**

The benefits from grazing help a few individuals, while the negative effects on the ecosystem, including riparian areas and crusts, are lasting and pervasive.

Comment Excerpt Text:

Grazing negatively impacts the condition and value of the land for tourism and wildlife.

Comment Excerpt Text:

With increasing tourism it becomes even more important to maintain public lands in as healthy and presentable condition as possible. Over grazed land, stripped brush and trees, pollution to the waterways by cow manure,

turned up stream banks by milling cattle, eroded trails, and maybe tastiest of all, dead cows in stream beds is not healthy or presentable.

Comment Excerpt Text:

It would allow the possibility of letting the land be free from cattle if allotment permits are given up voluntarily. This is critical for reducing the damage on these sensitive lands.

Comment Excerpt Text:

While I think it is important for the BLM to continue managing federal lands from a multi-use perspective, the combined effects of widespread grazing, coupled with oil and gas development, have contributed to a denuded landscape ripe for invasion of non-native plant and animal species. This results in a changed ecosystem that requires extensive effort and cost to remedy. Areas along the Escalante River serve as one example of this.

Comment Excerpt Text:

Alternative D seems to give the best opportunity for the restoration and future management of wildlife. All species of wildlife need food, water, shelter and space. The D alternative allows more aggressive management to accommodate those essential needs.

Comment Excerpt Text:

Riparian zones are very critical in an arid area, such as the GSENM and GCNRA. Alternative D allows a fairly aggressive opportunity to restore important native plants and animals, such as beaver, to those areas. That would create zones of maximum production, using the available waters, for many species of wildlife, fish, and domestic animals.

Comment Excerpt Text:

Destruction of native flora, habitat and native species

Thus increasing the stress on the native populations of animals and vegetation

Comment Excerpt Text:

The presence of cattle is detrimental to the natural habitat and adversely affects wildlife in the area.

Comment Excerpt Text:

Establish a goal that wildlife habitat be protected. This will serve to help protect the BIOLOGICAL, SCIENTIFIC, AND CULTURAL values within the boundaries of the monument.

Comment Excerpt Text:

The evidence overwhelmingly demonstrates that grazing cattle on the monument has resulted in the breakdown of a fragile ecosystem that is now on the verge of ecological collapse.

Comment Excerpt Text:

The requirement in Alt C that waters be shut off when livestock are not in a pasture will not adversely affect livestock, but may have adverse consequences for wildlife that use these waters.

Comment Excerpt Text:

Page 18 Desirable Conditions... for Objectives 1-5

Wildlife species will not be “subject to grazing”? Wildlife is generally not grazed. Doesn’t this mean that grazing would not occur if “significant impacts occur.”? What if significant positive impacts occur due to grazing for some species due to changes in plant density, cover or species composition?

Comment Excerpt Text:

I favor a management plan that includes a priority given to the widest inclusion and protection of native plants and wildlife. A rich diversity and complexity in an ecosystem offers the greatest protection against any natural (or manmade) disturbance to the environment.

Comment Excerpt Text:

Studies have shown that cattle grazing without regulation—for that is basically where we are on this issue; Cliven Bundy has proven that beyond doubt—is the chief cause of desertification in North America. Most of our western lands have been stripped, through grazing, of native plant diversification; our springs, creeks and rivers have been polluted; and native birds and mammals have suffered.

Comment Excerpt Text:

Restoration of native species should increase wildlife populations and may even allow for higher levels of animal units in some allotments, once ecological stability and balance is restored.

Comment Excerpt Text:

The relinquishment of grazing rights under IM#2013-184 could spell ecologic impacts far exceeding the analysis of this plan. If this IM is used, the matrix; to continuing grazing would be the best action in our view.

Comment Excerpt Text:

We need to realize also that this land is not just for grazing or hiking or other person-centered uses. There are rare species and more common plants and animals that use this area as their homes. I urge you to consider them in this process. They need protection and a fair share of land dedicated to their benefits.

Comment Excerpt Text:

Greater focus on wildlife other than “cattle” should become more important as grazing decreases.

Comment Excerpt Text:

Public lands grazing on the dry-land, drought-ridden GSENM makes no sense financially and environmentally.

Comment Excerpt Text:

An Action item would fence water developments to protect associated wetland/riparian resources. If the time and timing principles are employed in this alternative, then fencing would not be necessary for protection of these resources.

Section 15.14 - Climate**Comment Excerpt Text:**

The west needs a large ecosystem free of artificial grazing by non- native species to provide a baseline for what a natural western desert ecosystem looks like. This will be vital to make informed decision on other western lands as climate change begins to alter them.

Comment Excerpt Text:

Once grazing ends, it will be possible to see how it recovers and how resilient it will be under climate stresses.

Comment Excerpt Text:

From a larger perspective, it is abundantly clear that dust from the Utah deserts is having an impact on the Colorado River watershed, resulting in snowpacks melting more quickly in the spring.

Comment Excerpt Text:

With climate change and drought under our noses, it seems all the more relevant, if not imperative, that better grazing planning be initiated on public lands.

Comment Excerpt Text:

I'm also concerned that livestock grazing is an additional and unnecessary stressor that will exacerbate the looming impacts of climate change.

Comment Excerpt Text:

While I do not oppose grazing it needs to be reasonable and based on carrying capacity which is greatly affected by climate which is also very variable.

Comment Excerpt Text:

All alternative shall assess the cumulative impacts of livestock along with all other impacts including global warming.

Comment Excerpt Text:

Current text reads: At the top of page 61, Alternative E states, "In GSENM and Glen Canyon NRA, use ungrazed reference areas to help distinguish climate impacts from livestock grazing impacts."

Recommended change: "In GSENM and Glen Canyon NRA, use ungrazed reference areas to help distinguish climate impacts from livestock grazing impacts. Reference areas should be ten acres in size, or at watershed scale to include hydrologic function. Each representative Range Site Type, as defined by the NRCS Ecological Site Descriptions, in the Monument and Glen Canyon NRA shall be represented with replication preferable. These reference areas will be ungrazed and maintained for the long-term."

Rationale: There are not currently enough suitable, well-maintained, ungrazed enclosures that are large enough in the Monument that can help distinguish climate impacts from livestock grazing impacts. The DEIS needs to be clear that multiple new, large ungrazed reference areas will be designated, developed, and maintained in representative Range Site Types across this National Monument and NRA.

Section 15.15 - Cultural Resources**Comment Excerpt Text:**

I have seen the impact that livestock can have on the land first hand many times. The Chimney Rock area is one example. Otherwise prime and historic camp site is made pretty much unlivable with the amount of cow manure strewn around.

Comment Excerpt Text:

Additionally, we are site stewards for the monument and have seen the damage done to archeological dwelling sites and panels from cattle seeking shade.

Comment Excerpt Text:

Establish a goal that wildlife habitat be protected. This will serve to help protect the BIOLOGICAL, SCIENTIFIC, AND CULTURAL values within the boundaries of the monument.

Comment Excerpt Text:

Cattle tend to congregated under alcoves, many of which are archeological sites. Such accessible archeological sites located within grazing allotment areas might need to be fenced or otherwise protected from damage by cattle

Comment Excerpt Text:

The archaeological remains of three cultures (Fremont, Kayenta Anasazi, and Virgin Anasazi) are found in the monument, making it particularly important region. The EIS should ensure that these irreplaceable resources are adequately protected by including specific proposed actions for addressing the following unacceptable impacts:

Rock shelters where cattle tend to congregate for shade and protection from the elements can contain complex sites with features and perishable items. They often have subsurface deposits. Cattle can quickly damage this type of site through trampling, and crushing. Their urine and feces can destroy artifacts, especially perishable items. There have been instances where cattle dung has sprayed on top of rock art sites as well.

Standing architecture (historic and prehistoric) can also be affected. This is especially true for fragile standing walls where cattle can lean against or rub against. This same type of thing has been known to occur at pictograph sites in rock shelters. In one case, hair was embedded on the surface of lower lying rock art panels.

Open sites with artifacts or surface features, especially where cattle congregate (like around a spring, corral, or trough) can get trampling of features and artifacts as well as erosion from the area being denuded of vegetation. Once that occurs, sediment can wash or blow away, causing displacement of artifacts and features. Sites can also be damaged by wallowing where the cows create a bed for themselves. Cattle trails across sites can also lead to unacceptable erosion and damage.

Comment Excerpt Text:

Livestock impacts to cultural sites, especially at Cave and Lay Springs, were documented in 2007 by Monument staff. Additionally, Mexican spotted owls have been seen twice in the Grand Bench area. Grand Bench is also useful as a reference for vegetation conditions since it is relatively lightly grazed. Sites in reference conditions are critical as benchmarks against which to measure the effectiveness of management activities. The Monument has almost none. Preserving such a useful management tool should be the highest priority. By allowing grazing in Grand Bench, even if only as a grass bank, the Monument and NPS is failing in their duty to protect a wide variety of rare resources. It should be closed.

Section 15.16 - Economics**Comment Excerpt Text:**

Grazing negatively impacts the condition and value of the land for tourism and wildlife.

Comment Excerpt Text:

Grazing does not contribute positively to tourist economy.

Comment Excerpt Text:

I would also propose that the visitors the GSENM add more value to the local economy than grazing activities do. Yes, there is a history of cattle on the range in the west, but these dispersed operations of history bear no

resemblance to the intensive and damaging current grazing practices and the reality is damage is great and the economic benefits are low. The reality is that visitors to Southern Utah benefit the local economy much more than cattle grazing.

Comment Excerpt Text:

It is clear that tourism and a recreation economy--partially a result of the monument's designation--will generate far more revenue for the state of Utah than continued grazing.

Comment Excerpt Text:

The area livestock industry has traditionally relied on these lands for winter grazing. The impact to livestock production of reducing grazing and changing management practice is almost insignificant to the overall industry but the impact to the particular ranchers who operate in the Monument is significant. This alternative provides a two year notice for the changes proposed and compensation for improvements which are likely minimal. There are no reasonable alternatives for the local ranchers other than reduction of herds. Is there any potential for one time compensation to offset the immediate losses?

Comment Excerpt Text:

Additionally, since their inception, the world-class solitude and scenery afforded by GSENM and GCNRA have encouraged an increase in recreational activity. This activity brings significant economic benefit to the impacted communities, and yet mostly avoids widespread deleterious impact. I am concerned that extending grazing to additional areas, especially within GSENM and GCNRA, would degrade the recreational experience. Such degradation could short circuit the economic boon provided by recreation and tourism.

Comment Excerpt Text:

information of the sort described above may demonstrate that the ranching industry associated with BLM grazing has a limited future, failing to generate returns that will support replacement ranchers for the rapidly aging existing pool. If the numbers in fact point in that direction, it might be wise to relate any grazing plan to anticipate changes in the industry, as a way of reducing both administrative expenses, and of finding economically viable exist routes for ranchers planning for retirement.

Comment Excerpt Text:

As part of the implementation of a new management plan, I also urge to the BLM to develop and make available to public additional information about grazing on the Monument.

I. Determine the actual administrative cost for each AUM. In the context of making a policy decision, it would be helpful for all interested parties to know that actual administrative cost of to the public of providing a single AUM.

Comment Excerpt Text:

Collect and disseminate accurate information about the economics of grazing in the area; number of ranching operations, number of head/AUMs used by each operation, lease payments made by each operator, gross and net income information for each operator, and each grazing permittee, during the last decade; age of each permittee, number of private acres associated with each permittee; average price received for each head of cattle.

Comment Excerpt Text:

If this group of people is getting their livelihood taken away, furthermore they will have to relocate. They will take their kids with them and our schools will be emptier and we'll be losing valuable teaching jobs as a direct

result which would cause a growing lack of education. The demographics would shift more so to retirees and trust funders and the healthy little mixed communities would be water down the bridge. The big open spaces which make our towns so beautiful and picturesque would get chopped up, subdivided, and sold as the ranchers are forced to move out and sell out. The primary jobs available would be in the seasonal tourism industry which sounds scary to me as tourism can change rapidly and businesses are already operating of a small margin. And besides of everything: the tourist love the cows and they love the cattle drives the West is known worldwide for it and it's very attractive to tourist.

Comment Excerpt Text:

I am concerned if you were to change the management of grazing too much, it would affect the value of our private lands and grazing permits.

Comment Excerpt Text:

Jobs in Kane County are scarce and ranching is a way for families to make a living and economically support other business in the county.

Comment Excerpt Text:

Curtailment of grazing on heavily impacted arid lands would be an economic impact on a small percentage of the local population, but when conditions change the human population must adapt the same as any other organism.

Comment Excerpt Text:

The costs of benefits of grazing should be evaluated in the context of Colorado's current and potential future tourism income.

Comment Excerpt Text:

Our Taxpayer Association has recommend that the grazing EIS contain a thorough economic component that addresses the full array of economic issues associated with cattle ranching.

Comment Excerpt Text:

Because recreation is the primary economic driver in our area, complete an assessment of how money and staff is being allocated in the Monument, with the aim or correcting the current imbalance in staff positions and expenditures on cattle grazing versus recreation and science.

Comment Excerpt Text:

Stop wasting taxpayer dollars on failing restoration projects. Restoration seeding is expensive, and based on observations, more than half of the projects fail to meet their objective, often turning into wastelands inhabited largely by sagebrush. The EIS needs to include a full assessment of the results of past seeding projects, and a disclosure of the costs of these projects to the taxpayer.

Comment Excerpt Text:

The EIS should assess and estimate the lost opportunity dollar value associated with tourists having negative experiences on the Monument because of cattle grazing and subsequently not returning to the Monument or Kane County.

Comment Excerpt Text:

The EIS should assess and include the following topics related to the spending of taxpayer dollars:

- a. How much of local ranchers' incomes is government subsidy (state and federal), versus net income derived from the actual business of ranching?
- b. How much does the Monument actually spend on range management, including staff, operations, equipments, etc?
- c. Does the BLM range management program pay its way through the collection of revenue from the ranchers and other sources?
- d. What is the monetary value of the impacts on ecological health, damage to water and
- e. What is the economic impact of postponing the implementation of new grazing policies on Monument allotments?
- f. What is the economic impact of failing to enforce grazing policies including science based allotment standards, seasons of use, and other requirements for permittees?

Comment Excerpt Text:

Research and address current trends in the local economic input of ranching and tourism in the economies of both Kane and Garfield Counties.

Comment Excerpt Text:

Assess the amount of taxpayer dollars currently being spent on cattle ranching in the Monument versus recreation and tourism. Implement policies that redirect dollars toward those activities that generate the most money for our local economy, i.e., tourism.

Comment Excerpt Text:

Utah holds some of the most spectacular landscapes in our country. Protecting them as much as possible is important.

Many of us from out state spend much time and money in Utah because of this beauty.

Comment Excerpt Text:

There is not enough taxpayer money to pay for fire fighters and for the people behind desks who write reams of unintelligible regulations.

Comment Excerpt Text:

Why are certain private citizens given public lands significantly below market value on which to conduct their business, especially when that business leaves a trail of devastation and destruction?

Comment Excerpt Text:

Grazing on the Monument, contrary to common belief, does not have a huge economic impact of Kane and Garfield Counties when compared to rising income generated by increasing tourism and enterprises such as Best Friends Animal Sanctuary.

Comment Excerpt Text:

Some permittees reportedly have begun the practice of sub-leasing their allotments to ranchers from distant states, presumably at much higher rates than the minimal ones they pay the Federal government. Should they be allowed to profit in this manner?

Comment Excerpt Text:

It seems that the strongest argument for keeping grazing viable in the GSENM is to preserve our local cultural heritage and to provide jobs and tax revenues in the communities located within or adjacent to the GSENM. Allowing foreign ranchers to benefit from grazing in the GSENM does neither. If the permittees choose not to graze their livestock on their allotments, then they should either sell or lease these allotments to other ranchers based in Garfield or Kane counties or to conservation groups who might prefer to retire these grazing allotments.

Comment Excerpt Text:

In addition to rangeland improvement areas, reseeding burn areas after range fires would add to the demand for such local native plants. If buyers of local native seed were willing to commit to purchase substantial crops over a long period of time, farmers and ranchers living in communities bordering the monument might find new economic opportunities growing native plants.

Comment Excerpt Text:

Closing the entire monument to grazing goes too far too fast and would have a negative impact on local ranching communities.

Comment Excerpt Text:

A quick perusal of Utah's economic data on the impact of grazing in these critical desert areas as opposed to the low impact and high tax value of hiking demonstrates that low lease use of these lands for grazing makes no sense for Utah's economy

Comment Excerpt Text:

Taking away the cattle drives by taking away the permits takes away the experience that most tourists come to "the west" to experience. They want to see the all-American cowboy at his or her finest: on top of a horse and behind a cow. Taking away the permits takes away these beautiful hardworking and respectful people because suddenly their main source of income is gone. Most ranches cannot support their herds on their private lands and rely on their permits to maintain and feed their cattle which is precisely why they maintain and care for their rangeland.

Comment Excerpt Text:

Having the ranchers and families leave the area will decrease the economy of the area, empty the schools, take away from any year-round businesses, and detract from the "spirit" or legendary "western" feel of Boulder, Utah and the area which in turn, will lead to a decrease in tourism. Tourism has been keeping the small town and its business afloat for many years.

Comment Excerpt Text:

But it would also carry important (and generally negative) economic consequences for the local ranching communities and the small rural towns in which they reside.

Comment Excerpt Text:

it is worth considering that since the Monument was established the contribution of agriculture has declined considerably as a percentage total economic revenues in the Garfield and Kane Counties while that from the tourism and recreation industry has grown enormously

Comment Excerpt Text:

We also recommended in our scoping comments BLM use past and present tax roll and income information within the same timeframe to demonstrate actual economic trends to assist in the determination the impacts to the community as well to those who still rely on the grazing rights within the Monument to continue making an income from this occupation. Based on these facts we feel that we should give additional input into the management points of this alternative by suggesting modifications in order to add more stability and reliance to continue the cultural and ecological use of grazing in the GSENM.

Comment Excerpt Text:

It is paramount to identify accurately the social and economic facts in this NEPA document so that through the impact analyses, the true impacts to the counties and those on the land as well as the local business' will accurately reveal the effects. The Plan in areas speaks to recreation income possibly more than livestock revenues, but why is it necessary to reduce one income potential for the benefit of another when both have consistent needs in many ways.

Comment Excerpt Text:

If the BLM is going to include its standard economic analysis in the grazing plan; it should make an attempt to separate wage & salary estimates for imported federal employees (monument), and the rest of Kanab & Kane County. Of course all wages benefit Kane and Garfield County directly or indirectly; but the public cannot understand the impact of a generally low wage, seasonal tourism based economy without that separation.

Comment Excerpt Text:

In order for them to keep their ranch a viable business for their family only plan A and plan D would allow them to continue to run their cattle. Anything other than those options will lead to them losing their operation.

Comment Excerpt Text:

We understand a detailed socioeconomic analysis which considers the impacts of each of the alternatives is underway. We request that the detailed socioeconomic impacts be fully analyzed, disclosed and displayed for each of the alternatives. We also request that the analysis fully and completely disclose social impacts of the alternatives and their consistency with existing custom, culture, heritage and values of Garfield County, Kane County and the State of Utah. We also request analyses consistent and complying with the Regulatory Flexibility Act and the Data Quality Act be disclosed in the EIS.

Comment Excerpt Text:

The Bureau of Land Management ("BLM") and Grand Staircase-Escalante National Monument have specific direction on evaluating economic impacts that will need to be used when analyzing the alternatives in the GSENM Grazing Plan Environmental Impact Statement ("EIS"). When conducting an economic analysis, the BLM Land Use Planning Handbook[28] requires the BLM to evaluate the "Interrelationships among producing sectors" such as the relationship between the recreation and tourism industries and livestock grazing (Appendix D at pg. 5).

Adverse effects to "high value" recreation and tourist sites (e.g. Buckskin Gulch, Hackberry Canyon, Escalante canyon zone) due to cattle grazing should be evaluated and estimated as part of the EIS process. Visitors come from across the country to hike, camp and explore isolated regions of the Monument. The following are examples taken from GSENM grazing EIS scoping comments (January, 2014) where livestock grazing negatively affected their visits:

I have personally witnessed the amount of damage that livestock does to the land while camping by Chimney Rock, a spectacular and historic location.

I have visited southern Utah several times in the last decade to hike, and have become aware of how threatened the range is by its limited soils. It is even worse than our limited rocky dirt of the Ozarks.

I have instructed outdoor education courses in the canyons, as well as taken many personal trips there, including Escalante. Cow corpses, belligerent bulls, and an otherwise magnificent ecology speckled with cowpies weakens the vitality, integrity, and spirit of the place.

A topic described by the BLM Land Use Planning Handbook that should be analyzed is the “dependence on BLM lands and resources (Appendix D at pg. 7).” A “dependence on BLM lands” analysis would include visitor days and the associated expenditures of visits like those described above. It should explore the potential increase or decrease in economic activity by those visits that are impacted by livestock grazing management and decisions.

The BLM Land Use Planning Handbook also requires the BLM to scale the analysis to the appropriate level for the analysis. The assessment area may be larger than the planning area. For Grand Staircase-Escalante National Monument, the analysis area should include those surrounding communities that have experienced increases in economic activity due to the number of visitors and travelers since the GSENM designation[29]. For example, the contribution of personal income from farm employment within Garfield and Kane Counties must be set within the context of total employment income within the two counties. A livestock grazing EIS decision that affects increases or decreases in economic activity through recreation, tourism and wildlife watching within the primary counties and surrounding communities should be thoroughly explored and disclosed to the public.

i) Public and private costs and benefits

BLM instruction memorandum 2013-131, guidance describes the importance of the analysis as providing “important information on the distributional effects of a management decision, asking who gains and who loses”[30] (emphasis added). This will be an important distinction between alternatives particularly when identifying costs to the public, such as the BLM costs of monitoring and managing the livestock program (e.g., grazing program staff), public (state and federal) costs of building and rebuilding fences or other livestock infrastructure and undertaking vegetation management activities (including, e.g., UPCD funding, funding from the Grazing Improvement Program). These will vary widely among the alternatives. It would be of interest to estimate the approximate cost of planning and monitoring an allotment actively being grazed by livestock versus an allotment that is not being grazed by livestock. The amount of permit fees should be placed within the total costs of the BLM grazing program. When such an analysis was done for the Wallowa-Whitman National Forest grazing program, for instance, the public was found to be covering approximately 85% of the federal grazing program costs; the permit fees 15%. (That analysis did not consider additional costs covered by public funds invested by the state.)

When estimating the private or local community economic benefits to permittees of the various alternatives, it will be extremely important to base these economic benefits on current actual use AUMs in 2011-2013, as opposed to permitted AUMs.

The following would appear to be the appropriate way to estimate economic values to the permittees of current livestock grazing within the Monument:

Table 2 Some appropriate and inappropriate economic analysis methods

Animal Unit Months Appropriate: Actual Use AUMs (2011-2013): 37,028[31]

Inappropriate: Permitted AUMs: 76,864[31]

Infrastructure construction and maintenance

Appropriate: Separate costs to permittee from costs carried by federal and state inputs for livestock infrastructure (e.g., fences, spring infrastructure, pipes)

Inappropriate: Simply state permittee costs

Profits

Appropriate: Separate income from ranching operations from income from public subsidies

Inappropriate: Simply state income

Methods

Appropriate: State data sources and methods of analysis for each estimate

Inappropriate: Unclear data sources and methods

The BLM will be estimating various ranges of AUMs that would be expected under the various alternatives, but the No Action Alternative should clearly be based on current actual use of AUMs, and estimated actual use AUMs under the various alternatives. The question of “who gains and who loses” should be very clearly defined in the EIS and a key aspect of that is distinguishing between public and private costs and benefits.

ii) Evaluating nonmarket environmental values

A Bureau of Land Management instruction memorandum, Guidance on Estimating Nonmarket Environmental Values (September 12, 2013),[32] outlines direction for the BLM when estimating nonmarket environmental values. Attachment I of the memorandum, Economic Methods for Estimating Nonmarket Environmental Values, describes important methods and aspects of evaluating nonmarket services. As described in Attachment I, depending on how it is managed, livestock grazing can and does impact watersheds and riparian areas, plant (e.g., wildflower) diversity, watchable wildlife and fish through habitat damage, and loss of soils, all of which must be addressed when analyzing non-market environmental values.

For instance, the functional absence of biological soil crust leading to dust generation (dust on snow locally and regionally, dust movement covering remaining biological soil crust) may not be able to be readily measured monetarily, but should be described. Scientific research regarding the consequences, for instance, of dust on snow (e.g., reduced snowpack, earlier snowmelt) obviously has economic impacts, even if not readily quantified.

The guidance provides ways of describing nonmarket services including 1) qualitative, 2) benefit transfer and 3) primary research. We encourage the BLM to complete quantitative analysis or “primary research” of nonmarket

values through the EIS process. The BLM instruction memorandum (BLM IM 2013-131, Attachment I at page 6) “strongly encourages” the use of quantitative valuation methods when:

A proposed action is likely to have a significant direct or indirect effect (as defined at 40 CFR 1508.8 and 1508.27), and the quality or magnitude of the effect can be clarified through the analysis of nonmarket values...The alternatives to be considered present a strong contrast between extractive and nonextractive....The magnitude of the proposed change is large.

Nonmarket values do not have an extractive emphasis and are values easily omitted from analysis in an EIS process. We encourage the BLM to address all of the nonmarket values affected by livestock grazing and to adhere to guidelines outlined by the BLM Land Use Planning Handbook and the BLM Internal Memorandum and associated attachments. Some of those nonmarket values are outlined in the proclamation and are equally important as Monument objects such as biological soil crusts, endemic plant communities, and cultural and archeological resources. If the BLM initiates an economic impact analysis, it must conduct an entire impact and cost/benefit analysis to nonmarket services, ecosystem services, recreation and tourism.

Comment Excerpt Text:

A. Economics Analysis

i. Economic Analysis of Alternatives in Grazing EISs for the Beaver Ranger District Developed in accordance with Forest Service Manual 1970 and the Forest Service Handbook 1909.17, this document was developed in 2008 as part of a resolution agreement for eight cattle allotments in the Tushar Mountains.[33]

Section 2(d(i)) discusses the natural resources costs and benefits associated with livestock grazing. A description of natural resource costs of livestock grazing are difficult but necessary to quantify. Some of the costs include nonmarket services as described above such as soils and riparian conditions or the spread of exotic and noxious weeds. Further, the BLM EIS should describe, qualitatively, the economic linkages significantly affected by different alternatives that may not be quantified.

A thorough economic analysis should adequately analyze the impacts of livestock grazing to other uses of the landscape as well as other livelihoods earned on the landscape, particularly the recreation economy which has increased significantly since the Monument’s designation. The recreation industry adds over \$5 billion dollars to Utah’s economy each year.[34] Within the GSENM region, travel and tourism account for “37% total private wage and salary employment” and just under 1,200 jobs while farm jobs account for 8.1 percent of Garfield County jobs and 2.9 percent of Kane County employment.[35]

Critical Elements of an EIS analysis must include the following:

- A true valuation of actual AUMs compared against permitted AUMs
- Analysis of the No Grazing alternative that establishes a baseline and allows for comparison of devoting natural resources, GSENM staff administration, and construction and maintenance of livestock developments to grazing versus no grazing.
- The cost of vegetation treatments or seedings that restore degraded ecosystems.
- Cost of monitoring for land health and any necessary mitigation (e.g., fencing of riparian areas) to prevent natural resource degradation.

- Value of significant ecosystem services including the value of biological soil crust soil stabilization; pollinators' role in maintaining native biodiversity; and the services of clean water.
- Impacts to recreation including hunting, fishing (i.e., hunting and fishing permits), camping, hiking and wildlife viewing.
- Placing the economic impacts within the context and significance of the total local economy (specifically Kane and Garfield Counties).
- Clear distinctions between public and private benefits and expenditures associated with livestock grazing including public monies that are used to pay for grazing management infrastructure (e.g. fencing, water developments and troughs).

ii) A Profile of Agriculture: Grand Staircase-Escalante National Monument Counties: Coconino AZ, Garfield County UT, Kane County UT

This report, specific to GSENM, describes the positive economic impacts after the designation of the Monument. It found that jobs grew by 38 percent, personal income by 40 percent and per capita income by 30 percent between 1996 and 2008 while service jobs grew from 3,627 to 5,749. The report also found that farm employment accounted for negative (-) 2.8 percent of the total personal income in Garfield County and negative (-) 0.5 percent in Kane County.

iii) The Fiscal Impacts of Closing Certain Federal Grazing Allotments in the Grand Staircase-Escalante National Monument In 2004, University of Montana economics professor Thomas Michael Power wrote a report[36] specific to Garfield and Kane Counties that showed that in 2002 personal income from the farm sector composed 0.1 percent of total personal income in Kane County and 0.8 percent in Garfield County while visitor services composed 12.5 percent and 15 percent in each county respectively.

iv) Prosperity in the 21st Century West: The Role of Protected Lands in this report[37], published in 2004, the Sonoran Institute found substantial growth in personal income and real estate values in the communities near the Monument while unemployment numbers declined since the Monument's establishment.

ii) Use of multiplier effects within the analysis area

Estimated multiplier effects will need to be applied to both grazing and recreational uses, so that the sum of such multiplier effects does not exceed the reality of economics within the analysis area. A common criticism of multiplier effects for a given commercial activity is that if such multiplier effects were applied to all activities in the area, it would result in a picture of economic activity that exceeds that of the area. Economist Thomas Power wrote extensively of problems with multipliers in a Fishlake grazing EIS[38], which we are sending with these comments.

Comment Excerpt Text:

The Adoption of any of the alternatives, other than Alternative D, will have a devastating effect of Kane County, Garfield County, the other business in these areas, the schools and for me my way of life and my ability to sustain my family. It has been proven with study after study that agriculture dollars turn over in local economies far more times and with a far reaching and greater benefit than that of tourism.

Comment Excerpt Text:

These alternatives will negatively impact local economies. Tourists from all over the world come to the GSENM and surrounding towns not only appreciate the amazing and unique landscapes, but to also enjoy the “western experience.” (Without exception, every hiker/tourist we encounter spends at least 10 minutes taking pictures of our cowboys and cows.) Thousands of people come, to the GSENM craving a connection to the historical significance and romance of the old west. Our family takes great pride in sharing the beauties of the land, with everyone we invite to come and work cattle with us. These tourists and “honorary cowboys” bring in much needed revenue to local towns and businesses. The Western Legends event, held in Kanab, brings in thousands of tourists each year and is a great boon to Kane County’s economy. It is our Texas Longhorn cattle that they drive down Main Street in the parade. (See enclosed picture of our cattle participating in this event August 2014)

Comment Excerpt Text:

At least three of the proposals will effectively put us out of business. Our family represents 7 generations that have run cattle in Southern Utah. For our father and mother, who are in their 70’s, raising and marketing cattle is their ONLY source of income.

Comment Excerpt Text:

to have the government revoke our permit to graze our cows on BLM, Forest service and public range would put us out of business leaving us in a world of financial hurt

Comment Excerpt Text:

Cattle prices are already very high, forcing us to move our cows will raise the price of beef way higher than most of us pay check to pay check family's would be able to afford .

Comment Excerpt Text:

Several of these plans, if adopted, will put ranchers out of business! Of the choices presented, alternatives "A" and "D" are the only ones that come close to allowing ranchers to keep their grazing permits!

Comment Excerpt Text:

Why are we jeopardizing the future of cattle ranchers? I sincerely hope that those involved in the decision making on this will look long and deep before enacting something that is so unjust and unwanted!

Comment Excerpt Text:

The movie industry, locals and tourists all rely heavily on the ranching industry through different avenues, including search and rescue efforts.

Comment Excerpt Text:

Plan B represents a complicit destruction of the custom and culture of the region and a huge economic catastrophe on people in the area. Some families roots going back 150 years.

Comment Excerpt Text:

According to the report by Dr. Gil Miller, ranching and cattle grazing generates \$23 million for Kane County, and that could not be replaced without major infrastructure development and extremely higher numbers of tourists spending money in the area. Higher traffic and more development seems to be the opposite affect the special interest groups want, and certainly, it is not what the residents of Kane County want.

Comment Excerpt Text:

To discontinue use of these allotments and NOT compensate for the cost of the permits would financially bankrupt my family, as well as those of my two partners.

Comment Excerpt Text:

Furthermore, even if this option was approved, and there was no open revolt, the towns and communities connected with the GSENM area would all but disappear. There would be some revenue from tourism, although that will suffer, too. Some tourism would necessitate certain amenities, but businesses that depend upon the needs of the ranchers and their families would suffer. This would lead to other families, indirectly connected with ranching, to lose their incomes and have to relocate.

Comment Excerpt Text:

Draft Alternative D appears to be the alternative that is most compatible with Garfield and Kane County's plans, policies and interests. It also falls in line with the State of Utah's laws and recommendations and fits local ordinances. This alternative also aligns better with the conservation district's resource assessments for Garfield and Kane Counties and would continue to give land users, the Monument and all of our conservation partnerships opportunities in promoting sound resource conservation practices and projects on the ground which will benefit and protect the natural resource base as well as the local economies of Garfield and Kane Counties.

Comment Excerpt Text:

Livestock grazing has been important to the local economies for many years and the full discontinuance of the practice would have devastating impacts on the rural areas surrounding the GSENM area. An alternative to consider eliminating livestock grazing would not be a reasonable alternative to further analyze.

Comment Excerpt Text:

Please consider that the rangeland is much healthier as are the local surrounding communities more economically sustainable when grazing is supported and encouraged.

Comment Excerpt Text:

Livestock production is statistically insignificant to Utah's economy.

Comment Excerpt Text:

Public lands grazing on the dry-land, drought-ridden GSENM makes no sense financially and environmentally.

Comment Excerpt Text:

BLM's actions ignore NEP A procedure in favor of pre-determined opinions on the outcome of this planning process. Summarily removing the proposed Enhanced Grazing Alternative provides a politically-driven range of possible management decisions and improperly skews the range towards a reduction of livestock grazing in the Monument. The state strongly recommends the Enhanced Grazing Alternative be reinstated to fully represent a reasonable range of alternatives and provide for an examination of economic and environmental costs and benefits to resources within the Monument.

Comment Excerpt Text:

Many of these families have ranched these lands for over 100 years. To take this right from them will cause many ranchers to lose their herds and put them out of business

Section 15.19 - Public Health and Safety**Comment Excerpt Text:**

Grazing also presents certain health and safety challenges and can result in rather unpleasant experiences for Monument visitors.

Section 15.21 - Social-Heritage**Comment Excerpt Text:**

While assessing the benefits of this area for the good of the people, whether local to the area, state, or nation; please fully evaluate the use of this land and make the decision based on long-term stewardship of this delicate and beautiful area.

Comment Excerpt Text:

I believe that it protects the custom and culture of the area, as well as offering the best options for management of grazing, recreation, and historic rights on the GSENM.

Comment Excerpt Text:

This country was opened and improved by the cattlemen. Horses and cattle have used the land for a hundred plus years and there is no real reason to end this use.

Comment Excerpt Text:

According to documents regarding the establishment of this monument, ranchers were to maintain their grazing rights. Unless valid, scientific proof can be given that grazing has led to permanent damage of the land in question, the rights of the individual ranchers in question should not be violated. Consent given by local property owners in the establishment of this monument must be respected and their rights upheld

Comment Excerpt Text:

It seems that the strongest argument for keeping grazing viable in the GSENM is to preserve our local cultural heritage and to provide jobs and tax revenues in the communities located within or adjacent to the GSENM. Allowing foreign ranchers to benefit from grazing in the GSENM does neither. If the permittees choose not to graze their livestock on their allotments, then they should either sell or lease these allotments to other ranchers based in Garfield or Kane counties or to conservation groups who might prefer to retire these grazing allotments.

Comment Excerpt Text:

If the cattle ranchers are pushed out then you are inviting in the individuals that want to chop of the beautiful historic homestead ranches and put in yurts, trailers, and cheap homes. They will subdivide the landscape, build poor crowded lots of houses, and destroy the peaceful, amazing, beautiful and prosperous community that Boulder is. In order to keep the community in its naturally wonderful appearance of a picturesque western community brushed over with some modern technology and keep up today's important natural resource advances to maintain and benefit the environment, it's vital that the cattle graze the public lands. It's vital to the survival of Boulder for the cattle owners to ensure their livelihoods by keeping their cattle on the land. Boulder, and its surrounding area, NEEDS its cattle

Comment Excerpt Text:

We understand a detailed socioeconomic analysis which considers the impacts of each of the alternatives is underway. We request that the detailed socioeconomic impacts be fully analyzed, disclosed and displayed for each of the alternatives. We also request that the analysis fully and completely disclose social impacts of the

alternatives and their consistency with existing custom, culture, heritage and values of Garfield County, Kane County and the State of Utah. We also request analyses consistent and complying with the Regulatory Flexibility Act and the Data Quality Act be disclosed in the EIS.

Comment Excerpt Text:

The proposed changes to the Grazing Management Plan would permanently destroy one of the few authentic "cattle drive" operations left in the American West. These historically and culturally significant methods of cattle ranching would be lost to all future visitors to Utah, as well to the native Utahans for whom these operations are a cultural inheritance which deserves both recognition as well as protection.

Comment Excerpt Text:

It is alarming to us that without due process, and the stroke of a pen, many ranchers and their families will lose, not just their only source of income, but their way of life. A way of life that has been handed down through generations. We speak of the importance of preserving our national treasures yet it is sometimes forgotten that national treasures come in many forms, not just earth and stone. The American cowboy and the cattle they raise are also national treasures.

Comment Excerpt Text:

I enjoy seeing the history and ranching lifestyle as part of my recreational experience on the

Monument. Once lost, I do not think grazing will ever make a comeback in Kane and Garfield Counties. That would be a loss to the culture that is foundational to the West.

Comment Excerpt Text:

Plan B represents a complicit destruction of the custom and culture of the region and a huge economic catastrophe on people in the area. Some families' roots going back 150 years.

Comment Excerpt Text:

Livestock grazing is of historic and cultural importance and must be maintained and sustained. Livestock grazing has been a part of my family for at least 5 generations. We have learned a lot over the years and we care about the land and its sustainability. Removal of cattle grazing from the GSENM would be a sad loss of culture and loss of the continuation of historical practices which everyone benefits from in one way or another.

Comment Excerpt Text:

It is a way of life for generations of ranchers. It would be a travesty to take that away from these great families.

Section 15.24 - Vegetation

Comment Excerpt Text:

The benefits from grazing help a few individuals, while the negative effects on the ecosystem, including riparian areas and crusts, are lasting and pervasive.

Comment Excerpt Text:

Restriction of exotic plantings, focusing instead on the restoration/cultivation of native species.

Comment Excerpt Text:

While I think it is important for the BLM to continue managing federal lands from a multi-use perspective, the combined effects of widespread grazing, coupled with oil and gas development, have contributed to a denuded

landscape ripe for invasion of non-native plant and animal species. This results in a changed ecosystem that requires extensive effort and cost to remedy. Areas along the Escalante River serve as one example of this.

Comment Excerpt Text:

Our studies on the biodiversity of insects in the monument have found a number of species, including some undescribed scientifically to be found in areas with cryptogamic crusts such as at Calf Creek. Other areas such as dunes, dry side washes, and others with native vegetation include many poorly understood or undescribed species. Areas regularly grazed by cattle seem dominated by impacted soil, invasive alien weedy annuals and grasses and are of reduced or limited scientific interest not to speak of making the areas more prone to fire episodes.

Comment Excerpt Text:

Coordination of wildlife and livestock impacts and their uses of vegetation and waters on the EIS planning area, are important and necessary. Alternative D allows the best opportunity for coordinated efforts to succeed.

Comment Excerpt Text:

Impacting air quality, snow melt, water production, nutrient cycling, vegetation and contributing to climate change

Comment Excerpt Text:

Degradation of riparian and wetland habitat

Comment Excerpt Text:

Destruction of native flora, habitat and native species

Thus increasing the stress on the native populations of animals and vegetation

Comment Excerpt Text:

Over use and over consumption of existing natural resources

- Resulting in the decline and loss of native grasses, sagebrush (71% of the sagebrush grassland sites are rated as degraded) and natural cover
- Has opened the door to noxious, invasive species
- Creating erosion issues at arroyos, washes, banks, and steep hill sides

See: Natural Resources Conservation Service. 2006. National Range and Pasture Handbook Washington, D.C. pages 4-25

Comment Excerpt Text:

And lastly, the invasion of nonnative vegetation like Russian thistle and Scotch thistle is perpetuated by cattle who carry the seeds on their coats or undigested in their droppings into wider and wider areas.

Comment Excerpt Text:

Because it is so apparent that when grazing is decreased, wildfires and invasive weeds increase.

Comment Excerpt Text:

It is curious that this objective involves “minimizing” livestock grazing effects to maintain vegetation. The activities listed for “heavy recreation use” would seem to have much greater potential for altering vegetation than livestock grazing.

Comment Excerpt Text:

Blanket prohibitions against use of non-native species, even to the point of favoring local genotypes, may make it difficult to achieve objectives of achieving a “functioning” ecosystem. Local plants may not be available, they may be expensive, they may not establish easily, and if climate change is real, they may not even be the most adapted species. Use of native species may be preferred but practical and effective management may benefit in some cases by using non-natives.

Comment Excerpt Text:

Likewise, “management-ignited” fires (prescribed burning?) may be a much more effective and controllable way to use fire as a management tool to achieve vegetation objectives, than to depend on fires that occur “naturally.” The latter may not occur when or where needed the most and may occur under conditions which jeopardize nontarget areas or structures (maybe even public safety). Vegetation changes and climate changes often mean that re-establishing “natural” fire regimes are unrealistic and will not achieve management goals.

Comment Excerpt Text:

Studies have shown that cattle grazing without regulation—for that is basically where we are on this issue; Cliven Bundy has proven that beyond doubt—is the chief cause of desertification in North America. Most of our western lands have been stripped, through grazing, of native plant diversification; our springs, creeks and rivers have been polluted; and native birds and mammals have suffered.

Comment Excerpt Text:

Invasive plants such as tumbleweed and cheat grass mostly infest places that have been overgrazed, especially near stock tanks. Reintroducing native plants and perhaps letting the range rest in some parts of allotments is the only way to reestablish rangeland health in much of the GSENM.

Comment Excerpt Text:

The over growth of pinyon and juniper trees are causing the grasses to disappear, vast erosion to occur and an ever greater problem of wildfires.

Comment Excerpt Text:

Some of these crusts are there because the area is not in a healthy condition in the first place. If there were more grasses and forbs to hold the soil in place we would not need these crusts to try to do it. Due to Pinyon and Juniper encroachment these grasses and forbs have disappeared.

Comment Excerpt Text:

THE RANGELAND IS HEALTHIER WITH PROPER GRAZING. Grazing causes the plants to increase the growth of their roots. Therefore erosion is reduced with grazing. Without grazing, plants wither and die and erosion increases.

Section 15.25 - Visual Resources**Comment Excerpt Text:**

Important scenic and scientific resources are clearly suffering significant damage and destruction as a result of poorly regulated cattle grazing;

SECTION 16 - CONSISTENCY WITH STATE-LOCAL-TRIBAL PLANS-POLICIES**Comment Excerpt Text:**

Alternatives C, D, and E all call for “adaptive management” of grazing seasons, which is compatible with good range management and the Kane County RMP.

Comment Excerpt Text:

Alt E specifically mentions flexibility in season of use to manage for conditions and not calendar dates. This should be in alternatives C, D, and E. It is consistent with Kane Co RMP.

Comment Excerpt Text:

However to arbitrarily require that riders be present 5 of every 7 days anywhere an allotment is not meeting or moving toward objectives is not compatible with common sense. An allotment may not be meeting objectives for a variety of reasons, including livestock grazing but also including other factors such as wildlife, drought, recreation use, etc. The presence of a rider obviously will not further the attainment of those objectives in all cases. The requirement of 5 out of 7 days is also arbitrary and does not take into account site specific situations. This requirement is contrary to the principles of adaptive management and therefore not consistent with Kane Co RMP or MMP.

Comment Excerpt Text:

BLM should work with the local government, GIP and most import the Permittee, the only entity allowed under federal statute to hold range improvement agreements with the authorizing agency to construct and maintain water developments for better distribution of livestock. This action is necessary whether or not it is deemed to have an overall beneficial effect on Monument resources. Under Utah law, water sources for riparian areas, or to restore or manage native species or populations is not consistent with statute; for watering livestock it is. The overflow out of water tanks could be of a benefit to some of these uses. At that level, this action may be a means of achieving a portion of the MMP objectives. This statutory requirement should seriously be considered prior to canceling or modifying any grazing allotments for other public purposes.

Comment Excerpt Text:

Draft provisions throughout each of the alternatives are inconsistent with Utah State Law and local plans, policies and ordinances. We request- at a minimum -that these inconsistencies be identified in the descriptions for each alternative, fully analyzed and disclosed as part of the impact analysis of the document. Garfield County is willing to assist BLM in this task through the cooperating agency or government to government coordination process.

Comment Excerpt Text:

Draft Alternative D appears to be the alternative that is most compatible with Garfield County's plans, programs and policies. It also seems to be most compatible with Utah State law and local ordinances.

Comment Excerpt Text:

It appears the BLM has spent significant effort identifying alternatives which result in grazing levels that are reduced from the levels that existed at the time the Monument was established. Each of those alternatives is inconsistent with federal law, the Monument proclamation, Utah State law, and local plans, policies, programs and ordinances. We understand why there may be some desire to include such alternatives for analysis purposes only, but we assert they cannot be legally implemented. We request a detailed legal analysis be conducted and disclosed in the EIS regarding the implementation of each alternative.

Comment Excerpt Text:

Kane County's Land Use Ordinance and Resource Management Plan clearly states and defines the impacts any reduction in grazing would have on the local economy and culture

Comment Excerpt Text:

As stated in Kane County's Land Use Ordinance, 9-27A-3 (A—X) and the Kane County Resource Management Plan and General Plan it spells out some great historic uses and statutes that help protect grazing as a way of life. Through coordination and being consistent with local, state and tribal policies I believe the Grand Staircase-Escalante National Monument will be well protected in all ways and areas, thereby creating a win-win for all the public agencies.

SECTION 17 - DATA-SCIENCE-INFORMATION**Comment Excerpt Text:**

All range ecotypes need to be integrated and the ecological condition of each site determined. Rangeland management needs to be based on researched based Society for Range Management "Best Management Practices."

Whereas: 0-25% = poor condition, 26-50% = fair condition, 51-75% = good condition, and 75%-100% = excellent condition. All range systems less than "Excellent Condition" must include proper range management strategies

Comment Excerpt Text:

Also, the BLM is incorrectly using permit renewals in place of allotment management plans. In fact, the legal documents used would not pass as such in other professions, and because of these ambiguities it makes any agreements unenforceable.

See: Office of Hearings and Appeals. 2013. Ruling on Appeal UT-020-09-01, BLM's decision on the Duck Creek Allotment grazing permit renewal.

Comment Excerpt Text:

Converting to this type of system will provide specific guidelines and penalties that all interested parties could participate in when it comes to compliance, enforcement and disciplinary actions.

See: Department of the Interior's Environmental Statement Memorandum (EMS) No. EMS03-4, Procedures for Implementing Public Participation and Community-Based Training.

The Department of the Interior's Environmental Statement Memorandum (EMS) No. EMS03-7, Procedures for Implementing Consensus-Based Management in Agency Planning and Operations.

Comment Excerpt Text:

The ranching industry has had over 150 years to prove up on their claims that they are stewards of the land. Their understanding of land stewardship is substantially different from the trail of evidence left behind in their wake across the landscape.

- See: "The Story of Some Sick Land", U.S. Department of Agriculture, Forest Service, Intermountain Region, April 1944
- With large swaths of Boulder Mountain having to be rebuilt

- The razing of Upper Valley from rolling meadows with a meandering stream to a worthless chasm of a wash
- The wholesale destruction of predators, with the accompanying imbalance in the eco system
- There are volumes of data available showing the benefits and need for healthy predators to exist
- I.E. Yellowstone and the reintroduction of the wolf
- All business incur costs that are a part of doing business, loss of some livestock should be considered as such
- May be minimized by more labor intensive practices
- The elimination of beavers and the ability to store and harness water flows
- This loss has helped create enormous erosion issues
- Recharging aquifers and keeping water on the land is gone
- The blind adherence to developing a mono culture has diminished biological diversity and an eco-system becoming more dysfunctional

Comment Excerpt Text:

See: Holechek et al. (2000), Lacey et al. (1994), White and McGinty (1997), Johnson et al. (1996) and NRCS (1997) recommend using a 25% utilization for allocation for livestock.

Comment Excerpt Text:

Scientific literature generally argues that large-bodied herbivores were not a natural part of the Intermountain West which includes this Monument.

Young, J.A., R.A. Evans, P.T. Tueller. 1976. Great Basin Plant Communities-Pristine and Grazed. Nevada Arch Survey Res. Paper #6.

Reveal, J.L. 1979. Biogeography of the Intermountain Region: A speculative appraisal. *Mentzelia* #4.

Mack, R.N., and J.N. Thompson. 1982. Evolution in a Steppe with few large hoofed animals. *American Naturalist* 119:757-773.

Daubenmire, R.E 1985. The western limits of the range of American bison. *Ecology* 66:622-629.

Burkhardt, J.W. 1995. Herbivory in the Intermountain West, an overview of evolutionary history, historic cultural impacts, and lessons from the past. Station Bulletin 58, Idaho Forest, Wildlife and Range Experimental Station, University of Idaho.

Comment Excerpt Text:

Reduced ability of the soil to absorb and retain water

See: Neff et al. 2008; McConnell et al. 2007; Belnap et al. 2009; Belnap and Gillette 1997; Bowker et al. 2008a, 2008b; Field et al. 2010; Li et al. 2007, 2008

Comment Excerpt Text:

Streams and springs choked with cattle waste and water unfit for human consumption

See: The NLCS GSENM Plan Implementation Review 2010 further documented this concern.

Comment Excerpt Text:

Over use and over consumption of existing natural resources

- Resulting in the decline and loss of native grasses, sagebrush (71% of the sagebrush grassland sites are rated as degraded) and natural cover
- Has opened the door to noxious, invasive species
- Creating erosion issues at arroyos, washes, banks, and steep hill sides

See: Natural Resources Conservation Service. 2006. National Range and Pasture Handbook Washington, D.C. pages 4-25

Comment Excerpt Text:

Just take a hike through the Death Hollow Box Canyon. No cows ever had access to this area. Compare the flora and fauna in there with what's at the bottom when you emerge.

Hard to understand why cows should be permitted once you've taken this hike. Recommend it to any free range advocates and see what they say after this revealing before and after exposure.

Comment Excerpt Text:

The Department of Interior Fiscal Year 2012 Economic Report shows that grazing on public lands accounts for only 0.41% of the nation's livestock receipts and only 17,000 jobs. In contrast, recreation contributes \$45 billion to the economy accounts for 372,000 jobs.

Comment Excerpt Text:

The most recent U.S.D.A. Census on Agricultural reports that the net profit from agriculture including ranching in Kane County in 2012 was -\$705,000. This is a net annual loss of almost a million dollars.

Comment Excerpt Text:

Farm employment is dropping steadily in Kane County, as noted in An Analysis of Long-Term Economic Growth in Southwestern Utah: Past and Future Conditions. <http://www.dixie.edu/ir/File/Kane%20Profile.pdf>

Comment Excerpt Text:

Cattle ranching is declining in Kane County, as noted in the 2013 Kane County General Plan: "According to the 2007 Census of Agriculture, Kane County contained 91 cattle/calf operations running over 6,786 head of cattle. This represents a 28.6% reduction in total head of cattle and a 14.2% reduction in cattle/calf operations in Kane County since the 1992 Census of Agriculture."

Comment Excerpt Text:

Economic studies by the Headwaters Economics reveal the positive impact that federal lands have on the rural towns of the West. Tourism and visitors to the Monument are major economic drivers in Kane & Garfield Counties with high levels of private employment in the travel and tourism sector. The income generated by

travel and tourism related businesses far surpasses the revenue currently being generating by ranching.
http://headwaterseconomics.org/wphw/wpcontent/uploads/ProtectedPublicLands_Manuscript_2012.pdf
<http://headwaterseconomics.org/wphw/wpcontent/uploads/Escalante.pdf>

Comment Excerpt Text:

Where livestock is absent, wildlife suffers. This can be verified historically as far back as when Lewis and Clark made the journey west and when Peter Skene Ogden made note of the absence of wildlife on his journeys. Worse today is the increase of wildfires when the forage is not eaten. Wasted grass grows tall and falls over. The plants become matted when they die and even if lightning does not strike and it does not burn one year, new young sprouts are shaded and cannot get the needed sunlight to sprout. When fires rage out of control, millions of small animals are incinerated: leks, eggs, nests and sage hen chicks, chipmunks and countless other little creatures not to mention young and adult deer and many other species.

Comment Excerpt Text:

I have attached a BLM Use Management brochure from October 1964 entitled "Vermillion Resource Conservation Area" which covers the Kanab Grazing District and is now known as the GSENM.

Comment Excerpt Text:

The BLM's Landscape Approach to Managing Public Lands¹⁹ describes the challenge of developing a Monument grazing plan in light of climate change, as well as the Proclamation:

Climate change is influencing western lands and resources in many ways. As average temperatures rise, droughts are increasing, snowpack is declining, and water supplies are diminishing in key areas. . .

These changes undermine the ecological health of BLM-managed lands and impact our quality of life. Healthy public lands produce vital water supplies and natural resources for energy, food, and shelter. They also provide valued recreation opportunities, and places of solitude and beauty, which nurture and replenish our spirit. These core values and benefits are threatened by the environmental changes underway. (Emphasis added.)

The above BLM website provides BLM policy and resources upon which BLM managers should and can draw in order to address the interaction of livestock grazing with climate.

The Council on Environmental Quality has released draft guidance for addressing climate change in land use plans, as well as addressing greenhouse gases. [20] Some excerpts from the draft guidance are particularly relevant for assessing alternatives in this grazing plan EIS:

Broadly stated, the effects of climate change observed to date and projected to occur in the future include more frequent and intense heat waves, more severe wildfires, degraded air quality, more heavy downpours and flooding, increased drought, greater sea-level rise, more intense storms, harm to water resources, harm to agriculture, and harm to wildlife and ecosystems.[21]

This guidance . . .

- Highlights the consideration of reasonable alternatives and points to the need to consider the short-term and long-term effects and benefits in the alternatives analysis
- Counsels agencies to use the information developed during the NEPA review to consider alternatives that are more resilient to the effects of a changing climate; and

- Advises agencies to use existing information and tools when assessing future proposed actions, and provides examples of some existing sources of scientific information. .

It is essential, however, that Federal agencies not rely on boilerplate text to avoid meaningful analysis, including consideration of alternatives . . .

Fundamental to the NEPA process is the consideration of alternatives when preparing an EIS or an EA.[22] The requirement to consider alternatives is meant to ensure that agencies consider approaches with no, or less, adverse environmental effects as compared to the proposed action or preferred alternative.

This requirement seeks to ensure that each agency decision maker has the information needed to take into account possible approaches to a particular project (including the no-action alternative) that would alter the environmental impact or the balance of other factors considered in making the decision. Consideration of alternatives provides an opportunity to make the best informed, and potentially most beneficial, decision.

An agency should identify the affected environment so as to provide a basis for comparing the current and the future state of the environment should the proposed action or any of its reasonable alternatives proceed.[23] The current and expected future state of the environment without the proposed action represents the reasonably foreseeable affected environment that should be described based on available climate change information, including observations, interpretive assessments, predictive modeling, scenarios, and other empirical evidence.[24] The temporal bounds for the future state of the environment are determined by the expected lifespan of the proposed project.[25] Agencies should remain aware of the evolving body of scientific information and its clarification of climate impacts at a more localized level.[26]

The analysis of impacts on the affected environment should focus on those aspects of the human environment that are impacted by both the proposed action and climate change. Climate change can affect the environment of a proposed action in a variety of ways. Climate change can increase the vulnerability of a resource, ecosystem, human community, or structure, which would then be more susceptible to climate change and other effects and result in a proposed action's effects being more environmentally damaging. For example, a proposed action may require water from a stream that has diminishing quantities of available water because of decreased snow pack in the mountains, or add heat to a water body that is exposed to increasing atmospheric temperatures. Such considerations are squarely within the realm of NEPA.

Individual agency adaptation plans and interagency adaptation strategies, such as the National Fish, Wildlife and Plants Climate Adaptation Strategy, and the National Action Plan for managing freshwater resources in a changing climate, provide good examples of relevant and useful information that can be considered.[27]

Comment Excerpt Text:

A. Availability and Unavailability for Livestock Use.

At the core of the Sustainable Grazing Alternative is an innovative but not unprecedented approach to making lands unavailable or available to livestock grazing in BLM land use planning. In fact, we have pointed out several planning decisions where BLM has used an adaptive management approach to grazing in land use planning rather than the available/unavailable dichotomy that leads to more rigid and static management. These examples include:

i. Upper Deschutes RMP, OR (2005): allows for grazing permit retirement via a “grazing matrix” (at page 80) which allows for adaptive management in light of opportunities (which may change over time) and allotment conditions. The matrix is further discussed in the appendices and the full document is available online (BLM 2005b). The Clarno Allotment and the Lynch Allotment have been retired in recent years using the matrix (personal communication, Oregon Natural Desert Association).

ii. Carrizo Plain National Monument RMP, CA (2010): BLM set out the following three categories: (1) “Available for livestock grazing,” (2) “Available for livestock grazing, but only for the purpose of vegetation management,” and (3) “Unavailable for any livestock grazing,” (at II-56), showing that BLM can and should utilize a range of options beyond just available/unavailable for livestock grazing in planning in order to achieve the most appropriate management regime for the planning area.

iii. Pinedale RMP (2008): created three types of areas for oil and gas leasing: Intensively Developed Fields, Traditional Leasing Areas and Unavailable Areas. Traditional Leasing Areas can be converted to Intensively Developed Fields when certain criteria are met without having to engage in a plan amendment process. Although not related to grazing, this shows a parallel example for and adaptive management approach regarding allowable uses in a land use plan.

We believe that using the adaptive management approach as set out in the Sustainable Grazing Alternative will help alleviate some concerns with the status quo approach to grazing management where the expectation is that grazing will occur so long as lands are “available”, while also addressing concerns about vast amounts of lands being “closed” or made unavailable. This is a reasonable alternative for grazing that should be included in Alternative C for consideration. Also, as discussed in the section below, this type of innovative thinking and management is within BLM’s legal discretion and is encouraged by BLM policy.

Comment Excerpt Text:

A. Economics Analysis

i. Economic Analysis of Alternatives in Grazing EISs for the Beaver Ranger District Developed in accordance with Forest Service Manual 1970 and the Forest Service Handbook 1909.17, this document was developed in 2008 as part of a resolution agreement for eight cattle allotments in the Tushar Mountains.[33]

Section 2(d(i)) discusses the natural resources costs and benefits associated with livestock grazing. A description of natural resource costs of livestock grazing are difficult but necessary to quantify. Some of the costs include nonmarket services as described above such as soils and riparian conditions or the spread of exotic and noxious weeds. Further, the BLM EIS should describe, qualitatively, the economic linkages significantly affected by different alternatives that may not be quantified.

A thorough economic analysis should adequately analyze the impacts of livestock grazing to other uses of the landscape as well as other livelihoods earned on the landscape, particularly the recreation economy which has increased significantly since the Monument’s designation. The recreation industry adds over \$5 billion dollars to Utah’s economy each year.[34] Within the GSENM region, travel and tourism account for “37% total private wage and salary employment” and just under 1,200 jobs while farm jobs account for 8.1 percent of Garfield County jobs and 2.9 percent of Kane County employment.[35]

Critical Elements of an EIS analysis must include the following:

- A true valuation of actual AUMs compared against permitted AUMs
- Analysis of the No Grazing alternative that establishes a baseline and allows for comparison of devoting natural resources, GSENM staff administration, and construction and maintenance of livestock developments to grazing versus no grazing.
- The cost of vegetation treatments or seedings that restore degraded ecosystems.
- Cost of monitoring for land health and any necessary mitigation (e.g., fencing of riparian areas) to prevent natural resource degradation.
- Value of significant ecosystem services including the value of biological soil crust soil stabilization; pollinators' role in maintaining native biodiversity; and the services of clean water.
- Impacts to recreation including hunting, fishing (i.e., hunting and fishing permits), camping, hiking and wildlife viewing.
- Placing the economic impacts within the context and significance of the total local economy (specifically Kane and Garfield Counties).
- Clear distinctions between public and private benefits and expenditures associated with livestock grazing including public monies that are used to pay for grazing management infrastructure (e.g. fencing, water developments and troughs).

ii) A Profile of Agriculture: Grand Staircase-Escalante National Monument Counties: Coconino AZ, Garfield County UT, Kane County UT

This report, specific to GSENM, describes the positive economic impacts after the designation of the Monument. It found that jobs grew by 38 percent, personal income by 40 percent and per capita income by 30 percent between 1996 and 2008 while service jobs grew from 3,627 to 5,749. The report also found that farm employment accounted for negative (-) 2.8 percent of the total personal income in Garfield County and negative (-) 0.5 percent in Kane County.

iii) The Fiscal Impacts of Closing Certain Federal Grazing Allotments in the Grand Staircase-Escalante National Monument In 2004, University of Montana economics professor Thomas Michael Power wrote a report[36] specific to Garfield and Kane Counties that showed that in 2002 personal income from the farm sector composed 0.1 percent of total personal income in Kane County and 0.8 percent in Garfield County while visitor services composed 12.5 percent and 15 percent in each county respectively.

iv) Prosperity in the 21st Century West: The Role of Protected Lands in this report[37], published in 2004, the Sonoran Institute found substantial growth in personal income and real estate values in the communities near the Monument while unemployment numbers declined since the Monument's establishment.

ii) Use of multiplier effects within the analysis area

Estimated multiplier effects will need to be applied to both grazing and recreational uses, so that the sum of such multiplier effects does not exceed the reality of economics within the analysis area. A common criticism of multiplier effects for a given commercial activity is that if such multiplier effects were applied to all activities in the area, it would result in a picture of economic activity that exceeds that of the area. Economist Thomas Power wrote extensively of problems with multipliers in a Fishlake grazing EIS[38], which we are sending with these comments.

Comment Excerpt Text:**B. Non-Native Seedings**

It is unfortunate that so little information is readily available to the public regarding the outcomes of sagebrush and pinyon-juniper treatments and seedings on the Monument. It is not clear whether the Monument itself has tracked the outcomes over time for native and non-native species that have been seeded following Monument treatments; and in relation to when and how long the treated sites have been grazed by cattle following the treatments (e.g., crested wheatgrass, Russian wildrye, alfalfa, Siberian wheatgrass). It will be important for the Draft EIS to describe what monitoring the Monument has done following seeding of which non-native species, and the results. It will be important to provide links to the data upon which the Monument relies for its conclusions regarding the outcomes of such treatments.

Research literature expresses concerns for native species following treatments involving non-native seed mixes and post-treatment grazing. While research by Knutson and others (2014) [39] focuses on post-fire seedings data from 19 BLM offices, including in Utah it is relevant to any seedings on disturbed arid-land seedings:

Post-fire seeding of native perennial grasses generally did not increase cover relative to burned–unseeded areas. Native perennial grass cover did, however, increase after drill seeding when competitive non-natives were not included in mixes.

One explanation reasonably supported by our data is that non-native perennial grasses commonly used in post-fire seed mixes are more competitive than seeded native species (Chambers, Brown & Williams 1994). Competitive traits such as higher seed production and more rapid soil water extraction in non-native *A. desertorum* [desert wheatgrass] and *A. cristatum* [crested wheatgrass] [references] can interfere with growth and establishment of native perennial grasses [reference]

We were unable to evaluate grazing management practices that likely affected long-term ESR seeding outcomes. Grazing management data were not consistently available for all years or locations similar to other studies[reference]. Standard ESR [emergency stabilization and rehabilitation] practice by BLM is to allow a seeding at least 2 years rest from grazing to allow establishment; however, grazing has been cited as a potential for seeding failure long term [reference] and warrants further investigation.

Although monitoring programs can detect initial establishment of seeded species, 3 years is typically insufficient to determine effects on relative species dominance or long-term community trajectories. Few studies have evaluated ecological effects of post-fire seeding in non-forested regions [reference].

Successful adaptive management requires monitoring effectiveness of management actions to meet objectives [reference] Effectiveness monitoring of single projects provides limited information for adaptive management without input from additional projects. Evaluation of multiple projects under variable conditions over time provides a comprehensive understanding of success and failure that can inform future management decisions and improve long-term outcomes. Our findings suggest the ESR program on BLM-managed federal lands may benefit from an adaptive management approach to improve seeding success. Other land treatment projects with comparable goals and objectives (e.g. restoration, mitigation and fuels management) may also benefit from a similar approach to improve management decisions. (Emphases added)

Comment Excerpt Text:

C. Climate The GSENM is able to make use of the Southwest Climate Science Center[40], which can, among other services, provide “customized climate data from across the Southwest region to inform decision-making by private landowners, public agencies and natural resources managers.”

The GSENM and GCNRA can draw upon hundreds of scientific research papers, reviews, and reports from those of the Intergovernmental Panel on Climate Change, down to data on temperature trends in Kanab and Boulder over the past decades. The Colorado Plateau Rapid Ecoregional Assessment[41] should also be a resource for looking at broader impacts to the planning area from climate change and how grazing management may lead to increased or reduced impacts depending on decisions being made in the EIS/plan amendment.

One particular paper[42] reviews research indicating how ungulate grazing can add to impacts of climate change. Please contact Grand Canyon Trust if you wish copies of any documents cited in this paper.

Comment Excerpt Text:

D. Biocrust Conditions and Livestock Grazing

i. 2000-2003 Rangeland Health Data

The following data and discussion are taken from a forthcoming draft Trust report on biocrusts within the GSENM. The Trust, Wallowa-Whitman College students, and other partners revisited 114 of 425 Rangeland Health points (“RLH”) (2000-2003) within the Monument to measure biocrust cover in 2014. The 114 sites are all located on soils both prone to erosion and predicted to be capable of supporting biological soil crust.[43] Moss and lichen data was taken for all 114 sites, but the following analysis was conducted with a subset of 71 sites. Those 71 sites collected data that was compatible with predictive potential models and the 2003 RLH data. The Trust plans to revisit an additional 86 sites, similarly predicted to be in erosive soils capable of supporting crusts in 2015. These data will be incorporated into a final Trust report.

In Table 3, the Rangeland Health biocrust data gathered between 2000 and 2003 by Monument staff are referred to as RLH data. The biocrust data gathered in 2014 at 114 sites by volunteers are referred to as 2014 data. Predicted models were taken from classification and regression models that predict the percent available habitat within GSENM.[44]

Table 3: GSENM Biocrust Datasets [Terms and Definitions]

Predicted Percent Cover (Percent available habitat). The percent cover of biocrust as predicted by models created by Bowker and others (2006).

RLH Percent Cover. The percent cover of biocrust measured between 2000 and 2003(GSENM Staff).

2014 Percent Cover. The percent cover of biocrust as measured in 2014 (volunteers)

Percent of Potential. Comparison of percent cover and predicted percent cover that describes the percent cover of biocrust cover as a measure of predicted biocrust cover.

The 2003 RLH dataset resulted in the full range of measured percent cover between zero and 100 percent. The percent cover results were concentrated at the lower end. The most common value, or mode was 0, occurring at a rate of 31 percent or at 126 of the 425 sites (Fig. 1). Biocrust zero values occurred 31 percent of the time

where predicted potential values would have expected zero values to occur in 2 percent of the dataset. When compared with the predicted potential dataset, the 2003 RLH sites overall are lower than predicted (Table 4) Nine percent of sites experienced 50-75 percent crust cover where 17 percent of sites were predicted to have 50-75 percent of crust cover. The mean value of crust percent cover was 19.4, 12.6 percent less than the mean value of crust predicted and the median value of crust percent, 11.8, was 15.9 less than the median value (27.7) of the crust percent predicted.

Table 4: Values of biocrust percent cover: predicted and measured in 2003 2003 Crust Percent (RLH)

Mode: 0

Mean: 19.4

Median: 11.8

Crust Predicted

Mode: 51.9

Mean: 32.0

Median: 27.7

2003 Crust Percent of Predicted Potential

Mode: 0

Mean: 61.9

Median: 31.1

[Fig. 1 Percent measured cover of biocrust 2003.]

[Fig. 2 Predicted percent cover of biocrust.]

ii. 2003 Percent of Potential

Of sites where more than 20 percent of crust cover was predicted, ninety six percent were below their predicted potential cover while 4 percent of sites met or exceeded predicted potential (Fig. 3). Seventy one percent of sites were found to be less than 50% of predicted potential. Of the entire dataset (425 sites) mean predicted potential value was 61.9% percent but was skewed to a higher figure by a small subset of high values. This is demonstrated by observing the median value of 31.1 percent, again illustrating a dominance of lower values. If the 2003 dataset as a whole were meeting predicted potential values, the mean and median percent of predicted values would be expected to be closer to one hundred percent (Fig. 4).

[Fig. 3 Percent of potential 2003 values only on sites where greater than 20 percent biocrust cover is expected.]

[Fig. 4 Distribution of 2003 measured cover as percent of potential (predicted) values.]

iii. 2014 Biocrust data

The 2014 biocrust data resulted in measured percent cover similar to the 2003 measured percent cover as a whole, but individual sites experienced declines in measured biocrust cover. Almost 35 percent of sites in 2014 had no biocrust cover percent, a four percent increase from 31 percent of sites with no biocrust cover in 2003 (Fig. 5). Between 2003 and 2014, 37 sites that were measured both in 2003 and 2014 were measured as having lower biocrust cover than measured in 2003, 15 sites were measured as having the same biocrust cover as in 2003, and 19 were measured as having higher biocrust cover than in 2003 (Fig. 7).

[Fig. 5 Biocrust percent cover 2014.]

[Fig. 6 Predicted percent cover of biocrust.]

[Fig. 7 Comparison of measured biocrust percent cover in 2003 and 2014.]

The 2003 records for sites with markedly different 2003 and 2014 percent cover values will be examined in 2015 and if necessary, re-measured in 2015.

iv. 2014 Percent of Potential

Similar to the 2003 RLH dataset, the overall percent cover of sites in 2014 were lower than predicted values. Thirty four percent of sites predicted to support biocrusts had values of zero percent of their predicted potential while 75% were below 50 percent of their predicted potential. Of the 71 sites with complete data on crust, 8% met potential (Fig. 8).

[Fig. 8 Measured (2014) biocrust percent of potential values.]

v. Biocrust, Moisture and Season of Use

Biocrusts have been found by two researchers (Marble and Harper 1989) to decrease substantially under early-late (Oct. 15-May 15) grazing regimes compared with early winter only (Oct. 15-Feb. 15) grazing regimes.[45] Their report, "Effect of Timing of Grazing on soil-surface Cryptogamic Communities in a Great Basin Low-Shrub Desert," stated that eliminating grazing in "late winter and spring while soil moisture is likely to be adequate to permit some regrowth of cryptogams may result in enough surface stabilization to significantly reduce runoff and sediment losses due to torrential summer rains." The authors say the results also suggest that "cryptogamic covers" are depleted by late winter grazing.

Another researcher (Lusby 1979) noted that reducing or eliminating grazing by February 15th was also found to reduce soil erosion and runoff when compared with grazing that continued until May 15th.[46]

Similar conclusions and recommendations were expressed at the Biological Soil Crust Public Science Forum on August, 2014 held by the BLM[47] Several of the researchers noted increased impacts that occur to biocrust when disturbance or cattle grazing is not withdrawn prior to the soil drying out. Dr. Jayne Belnap stated at the forum: [48]

.... the best time [grazing use] is when the ground is frozen. The best time from the plant viewpoint is when they are dormant. So this is a big issue and something that I have always tried to put forth as the idea that to get the livestock off of an allotment, a good month or so before the rains most often stop.

Dr. Belnap's recommendations follow closely with the Marble and Harper study, i.e., that reducing grazing in the later winter and early spring reduces damage to biocrusts and therefore erosion.

Dr. Fee Busby, another researcher at the Biocrust Form, described a 1979 paper[49] by Gregg Lusby[50]:

The research work done by USGS scientists, Greg Lesby[Lusby] on Badger Wash in Colorado which is just north of Grand Junction, north and west of Grand Junction, and they did these grazing studies for -- about 20 years. It was a long study and it's not common for us range managers to do those kinds of studies that long. When it was all said and done, in that precipitation belt, the recommendation was that grazing on those sites, it's the desert shrub site, if it ended by February 5th, then all the plants could recover....A month or six weeks of still fairly good soil moisture....So that the plants . . . would grow and be very productive . . . So the system, the healthiest systems were those where they would move them.

Many Monument allotments are grazed by cattle well past February, into and through the growing season within GSENM, and some year round (Figs. 9[chart] and 10[map]).

[Fig. 9 Average Actual Use Monument AUMs 2011-2013 by season of use. The growing season is conservatively considered here to begin April 15, and end September 30.]

[Fig. 10 Map of GSENM cattle allotments by season of use. Minor state trust blocks are not included.]

The average precipitation between 1899 and 2010 shows a drop in precipitation beginning on average, in April, and ending in the lowest precipitation levels in June. When and if monsoon rains occur in July and August, that is when the temperatures are high and the crusts are brittle.

[Table 5. Monthly Climate Summary 1899-2005[51]]

Reducing or eliminating grazing pressures a month or 6 weeks before the crusts are dry would be very close to the winter-only grazing regime found by researches to prevent most damage to biocrusts and to reduce erosion.

The Draft EIS will need to describe the implications of cattle walking on biocrusts when they are dry, and when soil precipitation is low within the Monument.

[A note on the growing seasons of cattle use shown in Figs. 9 and 10: Since so many allotments graze cattle during the growing season, and not winter-only when plants are dormant, it is important that Alternative C calls for staggering use year to year during the growing season (here slightly reworded for clarity from the version shown in the Preliminary Alternative C):

In GSENM and Glen Canyon NRA, when grazing occurs during the growing season, there will be 6 weeks between the beginning of seasonal use of a particular allotment or pasture one year and when the season of use begins the following year. 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.

Comment Excerpt Text:

A much-cited review, "Adaptive Governance of Social-Ecological Systems"[7] was written by several Swedish ecologists, and it is highly relevant to adaptive management of GSENM. One of their concluding recommendations mirrors that of Sections C.1 and C.2:

Support flexible institutions and multilevel governance systems; the adaptive governance framework is operationalized through adaptive comanagement whereby the dynamic learning characteristic of adaptive management is combined with the multilevel linkage characteristic of comanagement. The sharing of management power and responsibility may involve multiple and often polycentric institutional and organizational linkages among user groups or communities, government agencies, and nongovernmental organizations, i.e., neither centralization nor decentralization but cross-level interactions. Adaptive comanagement relies on the collaboration of a diverse set of stakeholders, operating at different levels through social networks. This aspect emphasizes the role of multilevel social networks to generate and transfer knowledge and develop social capital as well as legal, political, and financial support to ecosystem management initiatives. [Emphases added]

Comment Excerpt Text:

In addressing range management in the revision the BLM should use and reference the quantitative data (including the methodologies used to collect them and the time they were collected) pertaining to the current and expected acreages which meet, or fail to meet, desired vegetative condition, and trends in vegetative condition. Using out-dated data or using methodologies which are no longer accepted, would be inappropriate. As we previously cited, the BLM's own planning handbook requires the use of the best available information.

Comment Excerpt Text:

As provided in our scoping comments, but ignored in the alternatives is the fact that livestock are significantly larger now than when the concept of the AUM was developed with the result being livestock forage consumption has increased dramatically and is now approximately 1,400 lbs for a cow calf pair, not 780 lbs that the BLM now permits. The alternatives completely ignore this issue.

Comment Excerpt Text:

None of the alternatives that the BLM has any intention of selecting completely fail to deal with drought management or provide any science-based management requirements to deal with drought.

We have provided various drought research papers, management guidelines and drought policies from other agencies for your review. We recommend a drought policy similar to the Tonto National Forest's which we have provided copies of. This policy should be tailored to fit the differing climate patterns which would mean adjusting the SPI from -0.70 to something more applicable to Utah such as -0.85.

The MMP must specify that the drought policy will come into effect in the ROD and that permit terms and conditions will be updated to reflect the drought policy.

Comment Excerpt Text:

"The Role of Drought in Range Management" is an excellent review of the current problem with agencies current drought responses and must be incorporated into this planning process.

Comment Excerpt Text:

We request the amendment team to review all of drought information we are providing, including citations. We request that a drought policy similar to the Tonto National Forest's be incorporated into the RMP. If the BLM does not feel this information is applicable to the MMP, we request that the EIS provide reasoning to support that claim. Without such review and analysis, the requirements of NEPA will not have been satisfied.

Comment Excerpt Text:

We have provided in C_Grazing Capacity Info Proposed Outline, a scientifically and legally defensible methodology for determining capability and suitability of BLM lands for livestock grazing. We request the BLM incorporate this process into the RMP as well as the EIS alternatives.

Comment Excerpt Text:

Since the alternatives were developed prior to this critical step, the alternatives are not informed by the AMS.

Comment Excerpt Text:

BLM seems to have developed alternatives without the required baseline data on conditions. These data give a context in which remedies presented in an alternative can be designed. An AMS would present past grazing use and management practices, habitat inventories, and assessments as they relate to agency ecological and economic goals and standards. It would provide the information needed for the public to analyze the issues raised in the scoping process. It's very difficult at this point to evaluate the alternatives without the benefit of an AMS.

Comment Excerpt Text:

The BLM received copious peer-reviewed, published, objective studies and data analysis from us during the scoping comments. These data substantiated issues, provided descriptions of conditions in the Monument which could be helpful in assembling the AMS, and served as base data on which to build remedies which would then be part of alternatives. But the draft alternatives seem to ignore most of this critical information. We remind the BLM that it has a legal requirement to use the best available science, including the direction specific to NLCS units (e.g., NEPA Section 1502.24, Secretarial Order 3308, Manual 6100, and Manual 6220).

Comment Excerpt Text:

BLM needs to establish a collaborative process to address the agency's failure to include the conservation community in grazing decisions. BLM has almost completely dismissed all field data and analysis that the conservation community has provided in its decision process, even though this information is often the most current and science-based.

Comment Excerpt Text:

My experience with the Monument and Glen Canyon began in 1976 when I went to work for the Utah Division of Water Quality (UDWQ). Till my retirement in 2006, I have traveled throughout the Monument and Glen Canyon sampling and assessing water quality and riparian systems. During the 1980's, we began a cooperative effort with the BLM and Glen Canyon staff on these efforts. I have sampled most every significant water source in these areas and assessed the results with Utah Water Quality Standards. As the results became available, we at the State began working with the Federal Agencies to protect and promote these water quality and riparian values. When the Monument came into being, many of these efforts were stepped up working in cooperation with GSENM and GCNRA staff. In 2000, I initiated an EPA program called EMAP (Environmental Mapping and Assessment Program). This was a Utah statewide program, but many of the sites, springs and streams were on the aforementioned federal lands. Although some of your staff may not be aware of this data, other members of GSENM advisory committee on grazing and wildlife have access to the data. Since it is public data, I have retained a copy and it is also available at UDWQ.

Comment Excerpt Text:

[5] Roosevelt Campobello Int'l Park Comm'n v. United States EPA, 684 F.2d 1041, 1047 (1st Cir. 1982) (quotations omitted)

[6] See synthesis of research in: Davies, K. W. et al. 2014. Implications of Longer Term Rest from Grazing in the Sagebrush Steppe. Journal of Rangeland Applications. Vol. 1, pp. 14-34.

Comment Excerpt Text:

The State strongly encourages the BLM to adopt the work of the Forage Subcommittee, recently formed within the Cooperating Agency group, to consider this issue and explore solutions and incentives that move AUMs in this direction.

SECTION 18 - PROCESS-RELATED

Comment Excerpt Text:

The public should be included in discussions about the percentage of grazed vs un-grazed lands, especially when grazing permits might be revoked.

Comment Excerpt Text:

The public, ranchers and scientists should all be involved in the process.

Comment Excerpt Text:

While I very much appreciate the BLM offering the card as a way to offer my comments, I believe this card is very difficult for people who don't have Acrobat reader to use. They have to update software, download the card, print it, fill it and mail it, a cumbersome process. In future, making a writable PDF that's configured to pop open in writable format would make it a lot easier for people who want to comment to do so.

Comment Excerpt Text:

As stated, this Analysis is to assist in formulating the Alternatives to be analyzed in the Environmental Impact Statement, and should be done before developing the Alternatives. We have yet to see the Analysis, not is it posted online. We question whether the GSENM is "getting ahead of itself" by developing and publishing the Alternatives prior to developing and publishing the (AMS). We question whether this oversight could "stall" the process and lead the GSENM and its cooperating agencies to require the AMS and start the alternative development phase from the beginning?

Comment Excerpt Text:

changes to the grazing plan are necessary for the BLM to be fully compliant with all applicable Federal authorities that require protection and preservation of Monument values.

Comment Excerpt Text:

One option would be for the Monument Advisory Committee to establish a Grazing Subcommittee that could help pull together the different stakeholders to attempt collaborative dialog and move toward consensus. All stakeholders should be invited to participate in the discussion; if they don't come, then that is their loss. Community leaders should come to the table and show maturity in working with people to come up with the best fact-based solutions. At a minimum, face-to-face discussions would help to define areas of broad agreement that are not sticking points. Hopefully, areas of disagreement can be resolved by seeking rational compromises. Every effort should be made to avoid later litigation by stakeholders whose concerns were not properly considered. Scientific data on range condition and amount of grazing allowed on different allotments should be provided. Peer-reviewed scientific papers are preferred in establishing assessment and monitoring protocols.

Comment Excerpt Text:**B. Non-Native Seedings**

It is unfortunate that so little information is readily available to the public regarding the outcomes of sagebrush and pinyon-juniper treatments and seedings on the Monument. It is not clear whether the Monument itself has tracked the outcomes over time for native and non-native species that have been seeded following Monument treatments; and in relation to when and how long the treated sites have been grazed by cattle following the treatments (e.g., crested wheatgrass, Russian wildrye, alfalfa, Siberian wheatgrass). It will be important for the Draft EIS to describe what monitoring the Monument has done following seeding of which non-native species, and the results. It will be important to provide links to the data upon which the Monument relies for its conclusions regarding the outcomes of such treatments.

Research literature expresses concerns for native species following treatments involving non-native seed mixes and post-treatment grazing. While research by Knutson and others (2014) [39] focuses on post-fire seedings data from 19 BLM offices, including in Utah it is relevant to any seedings on disturbed arid-land seedings:

Post-fire seeding of native perennial grasses generally did not increase cover relative to burned–unseeded areas. Native perennial grass cover did, however, increase after drill seeding when competitive non-natives were not included in mixes.

One explanation reasonably supported by our data is that non-native perennial grasses commonly used in post-fire seed mixes are more competitive than seeded native species (Chambers, Brown & Williams 1994). Competitive traits such as higher seed production and more rapid soil water extraction in non-native *A. desertorum* [desert wheatgrass] and *A. cristatum* [crested wheatgrass] [references] can interfere with growth and establishment of native perennial grasses [reference]

We were unable to evaluate grazing management practices that likely affected long-term ESR seeding outcomes. Grazing management data were not consistently available for all years or locations similar to other studies[reference]. Standard ESR [emergency stabilization and rehabilitation] practice by BLM is to allow a seeding at least 2 years rest from grazing to allow establishment; however, grazing has been cited as a potential for seeding failure long term [reference] and warrants further investigation.

Although monitoring programmes can detect initial establishment of seeded species, 3 years is typically insufficient to determine effects on relative species dominance or long-term community trajectories. Few studies have evaluated ecological effects of post-fire seeding in non-forested regions [reference].

Successful adaptive management requires monitoring effectiveness of management actions to meet objectives [reference] Effectiveness monitoring of single projects provides limited information for adaptive management without input from additional projects. Evaluation of multiple projects under variable conditions over time provides a comprehensive understanding of success and failure that can inform future management decisions and improve long-term outcomes. Our findings suggest the ESR programme on BLM-managed federal lands may benefit from an adaptive management approach to improve seeding success. Other land treatment projects with comparable goals and objectives (e.g. restoration, mitigation and fuels management) may also benefit from a similar approach to improve management decisions. (Emphases added)

Comment Excerpt Text:

These preliminary alternatives have been proposed without a “complete analysis” of the existing management situation.

Comment Excerpt Text:

The GSENM Proclamation clearly states, “Nothing in this proclamation shall be deemed to affect existing permits or leases for, or levels of, livestock grazing on Federal lands within the monument; existing grazing uses shall continue to be governed by applicable laws and regulations other than this proclamation.” This seems to contradict some of the more vocal sentiments expressed during the scoping process including, “...other interests think that the environmental values for which GSENM was established should take precedence over livestock grazing.”

Comment Excerpt Text:

I feel that the BLM and the ranchers should work together to make a plan to keep the history and other many positive aspects of the "range" alive while managing and preserving our precious lands. I strongly believe that the cattlemen have rights. They should always be included in any decisions pertaining to grazing.

Comment Excerpt Text:

There needs to be a process for more than just those who graze to be participants in decision with the BLM about where and how cattle graze in the monument.

Comment Excerpt Text:

Since the alternatives were developed prior to this critical step, the alternatives are not informed by the AMS.

Section 18.2 - Cooperating Agencies**Comment Excerpt Text:**

We support public involvement; however, we caution against private meetings with special interest groups that may violate FACA and could undermine the interests of the public through cooperating agency and/or government to government coordination status of local and state officials.

Section 18.3 - Consultation Requirements**Comment Excerpt Text:**

I request that the BLM have meetings with the grazing permittees to go through the alternatives line by line! How can the BLM have this discussion or make a plan about grazing that includes anti-grazing special interest groups and not the grazing permittees?

Section 18.4 - Grazing Regulations, Policies, Etc.**Comment Excerpt Text:**

As part of this EIS, it might be worthwhile to develop a new overarching GSENM Range Manual specifically adapted to this region. It would be based upon criteria used in other handbooks and laws presently dealing with grazing management in the BLM, but would be simplified to focus on only those habitats and special conditions that occur in the GSENM. Involving an outside panel of range scientists to help develop and analyze this handbook would hopefully lead to the best range management practices that apply to the GSENM landscapes rather than using broad-brush or outmoded range management philosophies. If this manual is clearly written, logical and succinct, then ranchers and the general public would better understand the ground rules for livestock grazing in the GSENM. As part of this handbook, grazing permittees should also be made aware that they must follow other rules, such as not driving ATV's into Wilderness Study Areas.

Comment Excerpt Text:

GSENM must carefully develop new monitoring protocols in order to properly administer grazing on monument allotments. I recommend involving range scientists from both academic and governmental institutions to develop verifiable criteria based upon the best available range science practices to determine rangeland health and suggest ways to improve range conditions. Guidelines should be established for sustainable livestock grazing. The most important variable, precipitation, should meet certain thresholds in order to allow grazing at the guideline levels or appropriately be reduced to prevent overgrazing. With the potential effects of climate change and drought, dry years should be factored in with accordingly reduced AMUs in order to prevent damage to long-term rangeland health. These policies should be peer reviewed by the knowledgeable and unbiased range scientists. Perhaps, an independent panel of range scientists could be established to review your monitoring protocols. Such a panel might be retained to independently assess range conditions in the event of contested management decisions by allotment permittees.

Comment Excerpt Text:

The MMP amendment must include timelines and priorities for the completion and review of progress of the Fundamentals of Rangeland Health Standards and Guidelines assessments and determinations as required under the 4180 regulations.

For further details on the implementation of the 4180 regulations, we request that the BLM review its 1/19/01 Manual Transmittal Sheet for H-4180-1 Rangeland Health Standards. We specifically bring the BLM's attention to its duties to make "significant progress" towards meeting Standards and Guidelines. The RMP must provide direction to achieve the Fundamentals of Rangeland Health and the Standards and Guidelines, and in those situations, of which there are many, where these are not being met, the RMP must provide sufficient direction that results in the required "significant progress".

Comment Excerpt Text:

Clearly, the BLM intend to continue authorizing livestock grazing, yet the alternatives fail to provide "decisions must also be made regarding intensity and limits or restrictions."

Comment Excerpt Text:

Further still, requirements specific to NLCS lands such as Secretarial Order 3306, Manual 6100 and Manual 6220 were not even considered, let alone complied with, in the alternative development process. In the case of the proposed alternatives, the BLM arbitrarily predetermined how many AUM's will be authorized without any of these considerations.

Comment Excerpt Text:

The use of the 2001 Congressional Appropriations Rider as a means of renewing grazing permits is allowing resource degradation to continue in those allotments that currently fail to meet standards. At this time all allotments have been renewed under the rider, some more than once, without any analysis or adjustments. Under the rules of this rider, BLM is not allowed to change the terms and conditions of permits renewed in this manner. This means that BLM has failed to meet its obligations to take action to rectify allotments that fail to meet standards. With the rider and Grazing Improvement Act, all direction, requirements or limitations imposed by this plan amendment or any Resource Management Plan are rendered meaningless. If direction from the MMP and this grazing amendment do not get inserted into permits within a set timeframe after the Record Of Decision is signed, necessary management adjustments on the ground will not change.

Comment Excerpt Text:

This alternative notes that voluntarily relinquished or retired allotments may be put into non-use. This action would be a clear violation of the Taylor Grazing Act and have a negative impact on the local economy. Allotments cannot, and should not, be put into non-use on the basis of voluntary actions by permittees.

Section 18.5 - Other Regulations, Laws, Policies, Etc.**Comment Excerpt Text:**

Also, the BLM is incorrectly using permit renewals in place of allotment management plans. In fact, the legal documents used would not pass as such in other professions, and because of these ambiguities it makes any agreements unenforceable.

See: Office of Hearings and Appeals. 2013. Ruling on Appeal UT-020-09-01, BLM's decision on the Duck Creek Allotment grazing permit renewal.

Comment Excerpt Text:

This also allows a very small minority or percentage of individuals as compared to the overall population to be allowed to dictate terms on property usage over large tracts of land that does not belong to them. The Monument has mandates established by law that need to be adhered to and these contracts and permits should be designed by Attorneys, not office staff, spelling out stewardship obligations, terms and conditions. Language ensuring that terms and conditions necessary to meet Monument obligations that are in place need to be included in any permit renewal.

Comment Excerpt Text:

MMP Decisions on Livestock Grazing p-12 - 13 This whole section is unnecessary. The Proclamation states that livestock "grazing uses shall continue to be governed by applicable laws and regulations other than this proclamation." Therefore, it seems that this is all that is necessary to describe how MMP decisions on livestock grazing will be made. However, experience with decisions made with regard to grazing management and the construction and maintenance of both structural and non-structural range improvements under the MMP so far indicate that these decisions go beyond any existing laws or regulations governing grazing on other BLM lands.

Comment Excerpt Text:

Alternative C is not compatible with the requirement in the Proclamation that nothing in the Proclamation shall be deemed to affect existing permits or leases, or levels of livestock grazing and that grazing would be governed by existing laws and regulations. The proposed conversion of large areas to "reference areas", the proposed conversion of allotments to non-use, and the many proposed "objectives" and actions contained in this alternative that are not consistent with "existing laws and regulations" governing grazing on BLM lands are in violation of the Proclamation. The whole alternative should be thrown out or modified to make it consistent with the Proclamation. The following comments are submitted on the assumption that BLM will keep this alternative in consideration in spite of its inappropriateness.

Comment Excerpt Text:

We would recommend that more of the important decisions on grazing, such as those involving permit violations and their consequences for permittees, opening reserve pastures, negative visitor experiences with cattle, emergency shutdown of pastures, and the like be made by the Monument Manager in consultation with all the affected resource managers beyond those in the range program. Several reports of unwise decisions following negative incidents involving cattle in recent years underscore the need for such broader oversight and responsibility.

Comment Excerpt Text:

The current process of amending the Monument Grazing Plan provides a perfect opportunity to move beyond the tired, frequently ineffective, and often damaging management practices still being applied on the Monument and promoted in the other EIS Alternatives.

Comment Excerpt Text:

Two other significant functions would be served by a network of large reference areas within the GSENM. First, these areas would contribute to preserving and recovering natural biodiversity. In a recent letter co-signed by most of the leading ecologists of this country, Secretary Jewell was reminded that the vast undeveloped lands administered by the BLM are one of the most significant remaining reservoirs of natural biodiversity in our nation and that, for this reason, redoubling efforts to protect them as biodiversity preserves needs to be a high priority for the agency. The reference areas of the GSESM would be consistent with this effort.

Comment Excerpt Text:

Season of use and livestock numbers fitting the rangeland health standards are a part of CFR 4100 and consistent with the TGA, if this decision is arrived at by accurate range data. We support flexibility as written into Alternative D although you should know that changes to some of these regulations are forthcoming since the passage of the NDAA. These changes will need to be integrated into the Monument Grazing Plan as a matter of federal statutory consistency.

Comment Excerpt Text:

In preparing the EIS, BLM must “rigorously explore and objectively evaluate all reasonable alternatives.”[1] This even includes reasonable alternatives that are outside the legal jurisdiction of the agency[2], though we believe all of the Sustainable Grazing Alternative lies within the legal jurisdiction of the agency. Additionally, BLM must respond to all substantive comments.[3] Substantive comments include comments that “present reasonable alternatives other than those analyzed in the EIS or EA.”[4] BLM may respond to alternatives presented by “modifying one or more of the alternatives as requested” and “developing and evaluating suggested alternatives.”[5]

The Sustainable Grazing Alternative was specifically designed to be a reasonable and internally consistent choice among various alternatives for grazing management in the monument. Parts of it may be an approach to grazing management that is unfamiliar to the GSENM. However, the Sustainable Grazing Alternative is crafted within BLM’s legal and regulatory discretion; and is a workable solution to both allow for conditions of the Monument to improve, while permitting livestock grazing to continue on most of the Monument.

The Sustainable Grazing Alternative is fundamentally based on the Final Report and Consensus Recommendations [6] (“Final Report”) of the multi-agency, diverse-stakeholder Collaborative Group on Sustainable Grazing for U.S. Forest Service Lands in Southern Utah (2012). Resource conditions and livestock management on the three national forests that are the subject of the Final Report (e.g., the Dixie NF) are similar to those of the Monument. Nothing proposed in the Sustainable Grazing Alternative runs counter to the principles and recommendations for ecologically, economically, and socially sustainable livestock grazing in the Final Report.

Comment Excerpt Text:

As stated in BLM Manual 6220.06(l)(3), “[t]he 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.” Public lands managers must be more adaptive to changing conditions

than ever before and will have to rely on innovation in grazing management in places like the monument to forge the path. As such, BLM must make land use planning decisions more adaptable to future conditions. This is one of the main thrusts behind BLM's "Planning 2.0" initiative. Specifically, BLM has stated that it intends to "create a dynamic and durable planning process that is responsive to change, making it more efficient to keep plans current through amendments." [16]

The approach set out in the Sustainable Grazing Alternative is an adaptive management strategy that gives BLM managers the discretion they need to change direction regarding whether lands are available or unavailable based on information collected throughout the life of the plan. By setting triggers for change based on criteria set forth in the alternative, BLM can respond to conditions in a more adaptive and efficient manner. Importantly, allotments can be transferred between available and unavailable using the criteria, without the need to amend the management plan.

This type of approach is supported by Departmental guidance [17] and is consistent with the Adaptive Management Framework set out in the MMP at Chapter 3.

For example, The Department of Interior's Adaptive Management manual requires that BLM "[i]ncorporate adaptive management principles, as appropriate, into policies, plans, guidance, agreements, and other instruments for the management of resources under the Department's jurisdiction."

As well, the DOI Adaptive Management Technical Guide [18] urges precisely the approach the Sustainable Grazing Alternative has taken with regard to "available" and "unavailable" allotments:

Alternatively, another approach to NEPA compliance that has proven successful for adaptive management programs is to prepare " programmatic" EIS at the start, which broadly covers the likely range of actions that may be taken under the particular adaptive management program. Later, any NEPA compliance needed for subsequent shifts in the management actions as a result of the adaptive management process can then "tier" off of the initial programmatic EIS, saving considerable time and work. [Emphases added]

The Sustainable Grazing Alternative provides a reasonable approach to adaptive grazing management which should be fully considered in light of DOI and BLM policy encouraging adaptive management planning.

BLM has the discretion to condition its decision on certain criteria under the regulations. For example, 43 C.F.R. § 4130.2(a) states that "Grazing permits and leases authorize use on the public lands and other BLM-administered lands that are designated in land use plans as available for livestock grazing." This does not limit BLM to either making lands available or unavailable in the planning process, but rather leaves decision space for BLM to make lands available but only if certain criteria are being met as set out in the land use plan. Conversely, BLM can also set criteria for lands that are unavailable to become available upon meeting certain criteria.

Comment Excerpt Text:

Several sections of the current MMP discuss the importance of prioritizing native species over non-native species in the Monument. This preference for protecting native species comes directly from the plain language and intent of the proclamation creating GSENM. Management decisions that promote alteration of the native ecology of the landscape by favoring uses that will harm and interfere with an ecosystem of native, non-invasive species are ill-advised and illegal under the directives of the Monument proclamation.

Comment Excerpt Text:

include diverse stakeholders in grazing management

Comment Excerpt Text:

Grazing on the Grand Staircase-Escalante National Monument was adjudicated under the Taylor Grazing Act of 1934. After passage of the TGA and subsequent adjudication of the public rangelands, the number of livestock grazing public rangelands was reduced, and stabilized to a level considered by many to be sustainable relative to the forage resource. However, issues associated with multiple-uses were not considered during the adjudications. An assessment and allocation of forage resources was an arbitrary process that did not use science, or a means to adequately determine the carrying capacity of the land or the needs of wildlife and other future uses on the land.

Comment Excerpt Text:

Draft Alternative D appears to be the alternative that is most compatible with Garfield and Kane County's plans, policies and interests. It also falls in line with the State of Utah's laws and recommendations and fits local ordinances. This alternative also aligns better with the conservation district's resource assessments for Garfield and Kane Counties and would continue to give land users, the Monument and all of our conservation partnerships opportunities in promoting sound resource conservation practices and projects on the ground which will benefit and protect the natural resource base as well as the local economies of Garfield and Kane Counties.

Comment Excerpt Text:

We as conservation districts are very concerned that the BLM has spent a significant effort in identifying alternatives that further reduce grazing numbers from those that existed before the Monument was created in 1996. Those kinds of policies on Monument lands are inconsistent with federal law, the original Monument proclamation, Utah State law, local county land use plans and the conservation district county resource assessment.

Comment Excerpt Text:

We know there are opponents to livestock grazing and that there is a desire to include such alternatives, but we assert that following such guidelines of dramatically reducing livestock grazing AUMs from the monument would be illegal.

Comment Excerpt Text:

Appendix C of the Handbook provides the heart of the planning process. Given its importance to complying with FLPMA, we have providing it, with highlights, in its entirety in our scoping comments. Of particular importance to the grazing amendment is Section I Subsections B, C, D, F, G and Section II Subsection B

The Department of the Interior Departmental Manual 516 DMI provides important guidance for the development of DEIS:

1.2 Policy. It is the policy of the Department:

A. To provide leadership in protecting and enhancing those aspects of the quality of the Nation's environment which relate to or may be affected by the Department's policies, goals, programs, plans, or functions in furtherance of national environmental policy;

Section D states, in part:

(4) Shall monitor, evaluate, and control on a continuing basis their activities as needed to protect and enhance the quality of the environment. Such activities will include both those directed to controlling pollution and enhancing the environment and those designed to accomplish other program objectives which may affect the quality of the environment. They will develop programs and measures to protect and enhance environmental quality.

They will assess progress in meeting the specific objectives of such activities as they affect the quality of the environment.

Section E states, in part:

(2) Shall use information obtained in the NEPA process, including pertinent information provided by those persons or organizations that may be interested or affected, to identify reasonable alternatives to proposed actions that will avoid or minimize adverse impacts to the human environment while improving overall environmental results.

(3) Shall monitor, evaluate, and control their activities on a continuing basis to further protect and enhance the quality of the environment.

Implementation of these requirements has not been done in the proposed alternatives. Subsection 1.19 Methodology and Scientific Accuracy (40 CFR 1502.24).

Implementation of these requirements has not been done in the proposed alternatives. Subsection 1.19 Methodology and Scientific Accuracy (40 CFR 1502.24).

Subsection 1.19 Methodology and Scientific Accuracy (40 CFR 1502.24).

Conclusions about environmental effects will be preceded by an analysis that supports that conclusion unless explicit reference by footnote is made to other supporting documentation that is readily available to the public. Bureaus will also follow Departmental procedures for information quality as required under Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Pub. L. 106-554, 114 Stat. 2763).

The Department of the Interior Departmental Manual 520 DMI provides important guidance for the development of RMP. We provide a highlighted version of this in full as Exhibit B.

We particularly draw your attention to the Policy statement, Section 1.7 C 4, 5 and 10 as well as 1.8.

We also provide as highlighted version of BLM Manual 1737 Riparian-Wetland Area Management as Exhibit C. Of critical importance are:

.06 Department of the Interior and BLM Policy (p9)

.11 C 1 through 6 (p12) which define RMP minimum requirements

.41A (p19) grazing related RMP requirements for the protection of riparian areas

.41B (20) Wetland management requirements for RMP's

.42A 1, 2 and 3 RMP requirements for soil and water

.45A and D - RMP requirements for fish and wildlife habitat

Page 30 Salinity Control Act requirements

We also provide as highlighted version of BLM Manual 6720 Aquatic Resource Management as Exhibit D. Of critical importance are:

.04J Manager responsibilities

.06 BLM Policy

.11 and .12 Inventory requirements

.13B (p9) RMP requirements

.16 (p11) RMP requirements

We also provide as highlighted version of BLM Manual 7200 Water Resource Management as Exhibit E. Of critical importance are:

Objectives (p3)

.06C RMP requirements

.21 Planning and RMP requirements

We also provide as highlighted version of BLM Manual 6840 Sensitive Species Management as Exhibit F. Of critical importance are:

.04E5 (p5) State director responsibilities

.06 (p7) ESA and Sensitive Species requirements

Section D on p9

.12 (p14) Sensitive Species RMP requirements

.2 (p15)

.22 (p36 and on) Section A

.22D4C (p41) RMP requirements

Each of the above is clearly relevant to the grazing amendment process and must be included in all the alternatives.

Comment Excerpt Text:

BLM RMP Planning Handbook Appendix C requires that lands available or not available for livestock grazing be determined by considering: other uses for the land; terrain characteristics; soil, vegetation and watershed characteristics; the presence of undesirable vegetation, including significant invasive weed infestations; and the presence of other resources that may require special management or protection, such as special status species, special recreation management areas (SRMAs), or ACECs.

The proposed alternatives fail to comply with this direction.

Comment Excerpt Text:

Sec. 4 Policy.

a. The BLM shall ensure that the components of the NLCS are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values. If consistent with such protection, appropriate multiple uses may be allowed, consistent with the applicable law and the relevant designations under which the components were established.

Again, the BLM has put the cart before the horse. The alternatives provided fail to be based on any assessment or implementation of the above policy.

Comment Excerpt Text:

the BLM, in NLCS units, must prioritize the conservation, protection and restoration of these “nationally significant landscapes” above BLM’s standard ‘multiple use’ approach.

Again, the BLM has put the cart before the horse and determined that livestock grazing will continue essentially in a status quo manner without any rational or logical analysis or determination that its status quo approach is “consistent with the designating legislation or proclamation”. Again, the BLM failed to make this basic NLCS requirement common to all alternative nor, and more fundamentally, has the BLM provided an analysis (AMS) of what level of livestock grazing could be allowed “to the extent that they are consistent with the designating legislation or proclamation”. This is a fatal error that must be corrected.

Comment Excerpt Text:

The BLM has failed to implement this requirement [for inventory and monitoring]. The result being is that the BLM is undertaking this amendment process blind. It has little to no data on most of the resources that the proclamation requires the BLM to protect. Without data regarding the condition of these resources and impacts from livestock to these resources, the BLM cannot provide the management requirements and limitations necessary to protect these resources.

Comment Excerpt Text:

Again, the BLM has ignored this [best available science] requirement that should be the basis for all alternatives. Current range science has been ignored as well as current science on biological soil crusts.

Comment Excerpt Text:

Again, the BLM has failed to implement this [primacy of Presidential/Congressional designations] requirement as the foundation of all alternatives.

Comment Excerpt Text:

2. Land use plans addressing NLCS units will identify the values for which the area was designated. Plans addressing NLCS units, including implementation plans, will emphasize the conservation, protection, and restoration of these values.

3. The BLM will develop monitoring strategies to track the implementation and effectiveness of plan decisions addressing NLCS units.

Again, the alternatives fail to implement these requirements.

Comment Excerpt Text:

Section I requires:

3. The BLM will only develop new facilities, including roads, within NLCS units where they are required under law, required for public health and safety, are necessary for the exercise of valid existing rights or other non-discretionary uses, prevent impacts to fragile resources, or further the purposes for which an area was designated.

Yet the alternatives provided fail to comply with this requirement.

Comment Excerpt Text:

K. Livestock Grazing

1. To the extent consistent with the designating legislation or proclamation and other applicable law, livestock grazing may occur within NLCS units.
2. Grazing management practices will be implemented in a manner that protects the values for which NLCS units were designated unless otherwise provided for in law.
3. The BLM will use NLCS units as a laboratory for innovative grazing techniques designed to better conserve, protect, and restore NLCS values, to the extent consistent with the designating legislation or proclamation and other applicable law.

Again, the alternatives fail to implement these requirements.

Comment Excerpt Text:

- A. Comply with designating Acts of Congress and presidential proclamations by conserving, protecting, and restoring the objects and values for which Monuments and NCAs were designated for the benefit of present and future generations.
- B. Effectively manage valid existing rights and compatible uses within Monuments and NCAs.
- C. Manage discretionary uses within Monuments and NCAs to ensure the protection of the objects and values for which the Monuments and NCAs were designated.
- D. Utilize science, local knowledge, partnerships, and volunteers to effectively manage Monuments and NCAs.

The BLM has failed to implement this direction in the provided alternatives.

Comment Excerpt Text:

C. Compatibility of Uses.

1. Site-specific activities in Monuments and NCAs will be managed in a manner that is compatible with the protection of the objects and values for which these areas were designated. Multiple uses may be allowed to the extent they are consistent with the applicable designating authority, other applicable laws, and with the applicable land use plan.

2. Through the NEPA process, the manager with decision-making authority for a Monument or NCA will evaluate discretionary uses and will analyze whether the impacts of the proposed use in the Monument or NCA or similarly designated area are consistent with the protection of the area's objects and values. As part of this analysis, the manager will consider the severity, duration, timing, and direct and indirect and cumulative effects of the proposed use. If necessary and appropriate, the BLM may use the land use planning process to consider whether to change discretionary use authorizations.

3. When approving a proposed action, the decision must document how the activity is consistent with the proclamation or designating legislation.

The BLM has failed to implement this direction in the provided alternatives.

Comment Excerpt Text:

F. Facilities.

1. The BLM will inventory existing facilities within Monuments and NCAs and determine whether to remove, maintain, restore, enhance, or allow natural disintegration of each facility. Subject to applicable law and valid existing rights, the BLM will consider removal of facilities on Monuments or NCAs that do not have administrative, public safety, recreational, cultural, or historic value.

The BLM has failed to implement this direction.

Comment Excerpt Text:

3. The BLM will only develop new facilities, including structures and roads, within Monuments and NCAs where they are necessary for public health and safety, are required under law, are necessary for the exercise of valid existing rights or other non-discretionary uses, prevent impacts to fragile resources, or further the purposes for which an area was designated.

Livestock grazing does not fit under any of the categories provided for the construction of new facilities. All the alternatives must implement this requirement.

Comment Excerpt Text:

Section G requires:

4. Land use plans must analyze and consider measures to ensure that objects and values are conserved, protected, and restored. Specifically, plans must:

a. clearly identify Monument and NCA objects and values as described in the designating proclamation or legislation; where objects and values are described in the designating legislation or proclamation only in broad

categories (e.g. scenic, ecological, etc.), identify the specific resources within the designating area that fall into those categories;

b. identify specific and measurable goals and objectives for each object and value, as well as generally for the Monument or NCA;

c. identify management actions, allowable uses, restrictions, management actions regarding any valid existing rights, and mitigation measures to ensure that the objects and values are protected; (emphasis added)

g. include a monitoring strategy that identifies indicators of change, methodologies, protocols, and time frames for determining whether desired outcomes are being achieved; and

h. be evaluated at least every five years, consistent with and as required by BLM land use planning guidance.

Again, the BLM has utterly failed to implement these requirements within the proposed alternatives.

Comment Excerpt Text:

The NPS has not provided any information as to what management actions are needed for livestock grazing on NPS lands not to degrade the values and purposes for which the unit was established, yet the BLM, in its usual style, has already determined on the NPS's behalf how livestock grazing will continue and where. Again, the BLM has put the cart before the horse in its rush to maintain the status quo.

Just as an example of the wide range of NPS requirements that the BLM has ignored, would be Directors Order 77-1. Has the NPS provided a review of the regulations and direction that all alternatives? If not how could you have developed alternatives that comply with those requirements?

Comment Excerpt Text:

The proposed action is a major RMP amendment and must comply with the above requirements just as an RMP process would have to. The current alternatives fail in this regard. [BLM Manual 1601 Land Use Planning, Section .1 B, Section 2.02]

Comment Excerpt Text:

Page 62 allows water developments on NPS lands. As the recent debacle with the Hole in the Rock well clearly shows, water developments within NPS lands cannot comply with the values and purposes for which the Park was created. We provide as an attachment and after-the-fact report of the archaeological degradation caused by this water development. Similar impacts are occurring in a wide area surrounding the water development to vegetative resources.

Comment Excerpt Text:

F. The Colorado River Basin Salinity Control Act, 43 U.S.C. 1593, requires a comprehensive program for minimizing salt contributions to the Colorado River from BLM lands.

Livestock grazing significantly increases salinity in runoff (see scoping appendix 33) and the alternatives must provide compliance with the above.

Comment Excerpt Text:

Section .06 requires:

2. The BLM's mission is to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations. Land use plan decisions will further this mission by identifying desired outcomes and actions that restore and maintain the health of the land; preserve natural and cultural heritage; reduce threats to public health, safety, and property; and provide opportunities for environmentally responsible recreational and commercial activities.

3. When making land use plan decisions, the BLM will consider information from all available sources, including scientific data gained from resource assessments, information regarding ecosystem protection and restoration needs, the reasonably foreseeable development of consumptive and nonconsumptive uses, and social and economic information.

The Manual provides specific definitions for the requirements that a RMP must contain:

Goal: a broad statement of a desired outcome. Goals are usually not quantifiable and may not have established time frames for achievement.

Guidelines: actions or management practices that may be used to achieve desired outcomes, sometimes expressed as best management practices. Guidelines may be identified during the land use planning process, but they are not considered a land use plan decision unless the plan specifies that they are mandatory. Guidelines for grazing administration must conform to 43 CFR 4180.2.

Land Use Allocation: the identification in a land use plan of the activities and foreseeable development that are allowed, restricted, or excluded for all or part of the planning area, based on desired future conditions.

Land Use Plan Decision: establishes desired outcomes and actions needed to achieve them. Decisions are reached using the planning process in 43 CFR 1600. When they are presented to the public as proposed decisions, they can be protested to the BLM Director. They are not appealable to IBLA.

Objective: a description of a desired condition for a resource. Objectives can be quantified and measured and, where possible, have established time frames for achievement.

Planning Criteria: the standards, rules, and other factors developed by managers and interdisciplinary teams for their use in forming judgments about decision making, analysis, and data collection during planning. Planning criteria streamline and simplify the resource management planning actions.

Resource Use Level: the level of use allowed within an area. It is based on the desired outcomes and land use allocations in the land use plan. Targets or goals for resource use levels are established on an area-wide or broad watershed level in the land use plan. Site-specific resource use levels are normally determined at the implementation level, based on site-specific resource conditions and needs as determined through resource monitoring and assessments.

Standard: a description of the physical and biological conditions or degree of function required for healthy, sustainable lands (e.g., land health standards).

The alternatives provided fail to comply with these requirements.

Comment Excerpt Text:

While the BLM has been writing goals in recent RMP's, the objectives have been noticeably missing. The alternatives provided likewise fail to provide objectives as laid out in the manual. [Think the author means "handbook," BLM H-1601-1, since that is what s/he cited prior.]

Comment Excerpt Text:

The alternatives fail to implement these requirements. [allowable uses (land use allocations) and management actions as defined in BLM H 1601]

SECTION 19 - OUT OF SCOPE**Comment Excerpt Text:**

Alternative B would also reduce conflicts between ranchers and wolves when wolves are restored to the Grand Canyon watershed, which is necessary for the recovery of Mexican wolves according to the USFWS science team.

Comment Excerpt Text:

Pipelines and troughs should not be considered improvements.

Comment Excerpt Text:

From what I have seen scattered throughout the Monument it would behoove Management to put a moratorium on any further improvements until such time;

- That all the failed and abandoned schemes are removed to a substantial degree
- Concrete pads and culvert columns
- Water Tanks (rusting and abandoned)
- PVC and ABS water lines working their way out of the ground
- Remove and fill in water wells that are dry holes
- Plastic buckets, barrels, trash dumps
- Unused barb wire fences, unused corrals, personal trash
- Local Counties need to be instructed to remove all their trash
- Road crews need to pick up and remove all their tom out trashed culverts
- They need to remove all unused road materials and miscellaneous trash
- Take all materials back to their yards and properly recycle or store materials
- Remove and dispose of all ramshackle buildings, lean to's, and structures that do not have any historical value
- Restoration and mitigation of the disturbed area under direct supervision of the BLM
- All costs to be borne by the responsible party that installed the improvement

Comment Excerpt Text:

- Ranchers having to become licensed professional entities
- Ranchers to carry commercial liability insurance and performance bonds

- Only licensed and insured ranchers would be allowed to pull permits
- All certificates of insurance and bonding to be renewed yearly
- With the BLM listed as the certificate holders and additional insured
- Bonding would insure monies are available for mitigation and restoration of property damage and trash removal created by cattle operations. It would also help in maintaining timely compliance with contracts.
- Continuing education classes on an annual basis

Comment Excerpt Text:

As in all other trades and professions that are involved in working on other peoples' property there needs to be a minimum standard applied across this industry in regards to business practices, practical experience and liability.

Comment Excerpt Text:

The BLM has a wholly dysfunctional law enforcement attitude towards out right violators and noncompliance individuals that are on GSENM property. For many years there has not been enough man power on the Monument to have adequate law enforcement. One person, is not reasonable by any stretch of the imagination, it is physically impossible to patrol roads, trailheads, deal with emergencies and have anything left over for any backcountry presence. There need to be at least two (2) officers in this area alone for the amount of square miles, the yearly increasing visitation of users and dealing with the daily issues of the ranching industry.

- I.E. The problems at Peek a Boo Canyon in December 2014
- There is increasing abuse of off road activity using 4-wheelers and dirt bikes leading to a slew of damaged land issues
- Boundary fences that are in total disrepair with minimum or no maintenance taking place
- Trespassing cattle are a chronic problem in the GSENM
- Inaccurate and misleading cattle counts occurring on all allotments
- Feral/wild cattle need to be located, corralled and removed
- Back charge all costs to permit holder or owner of the brand on the cattle

Comment Excerpt Text:

BLM regulations require that "whenever it appears that a violation exists and the owner of the unauthorized livestock is known, written notice of unauthorized use and order to remove livestock by a specified date shall be served upon the alleged violator." 43 C.F.R. § 4150.2(a). This regulation sets forth a clear and direct mandate. It neither allows BLM to decide for itself whether to notify an alleged violator nor leaves the method of notification to BLM's discretion. It plainly states that the BLM "shall" serve "written notice." Failure to issue a written notice, the BLM has "failed to take discrete agency action that it is required to take,"

- The unapproved, unauthorized or illegal installation of infrastructure
- Accumulating trash from industry, repairs and visitation
- I.E. Unauthorized line shack in the way of a school bus dragged into the Circle Cliffs years ago, now an abandoned piece of junk full of pack rats

- Illegal hunting and trapping
- Vandalism to signs, trees, archeological sites

Comment Excerpt Text:

I would like to see more cattle, more goats, more wood gathering, mining, mineral extraction, etc., because as a people we need energy, food and resources that comes only from the earth.

Comment Excerpt Text:

Page 43 Soil Objective I

The activities outlined under this heading constitute a very large effort in collecting and interpreting field data on soil erosion, or at least on indicators of soil erosion. BLM does not and will not have funds to support such an effort and likely will not have qualified personnel to do this. Who is going to provide the money and personnel to carry this out in a sound manner? BLM should not obligate themselves to do this.

Comment Excerpt Text:

There also seem to be few if any consequences for serious violations and repeat violations on the part of the permittees.

Comment Excerpt Text:

Not all parts of the Monument are “roaded” or have simple access by cars. Not all places have bike trails or hiking trails.

Comment Excerpt Text:

G. Cultural Resources

1. The BLM will identify priority areas within NLCS units for nomination to the National Register of Historic Places, for cultural resource inventories, and for archaeological research consistent with the BLM 8100 manual series (Cultural Resources Management). Inventory priorities will be determined at least in part by resource values and the risk of disturbance, including loss of the resource to theft or erosion.
2. The BLM will monitor the condition of historic properties and traditional use areas within NLCS units for vandalism and other disturbances or changes.

Again, the alternatives fail to implement these requirements.

Section 19.1 - Implementation**Comment Excerpt Text:**

I. Inspections of range use must be conducted by inspectors that are impartial and not living in or related to the location area being inspected.

Comment Excerpt Text:

Ranches using public land should be required to put up bonds to insure the land they are using is well cared for and monies are made available for such restoration.

3a. If bonds were required that money could be used to correct the recent situation in peekaboo canyon.

Comment Excerpt Text:

We need to be able to maintain current water resources and to develop new resources. We need to be able to run new pipelines or built new ponds.

Comment Excerpt Text:

We need to be able to build new fences and maintain old ones.

Comment Excerpt Text:

The BLM needs to step up to its fiduciary responsibility to protect public lands. Fines and the collection of fines are an effective deterrent in the private sector and I assume will work just as well in the public sector. A pocket book becoming lighter will achieve compliance when there are violations occurring and warnings are ineffective. The lack of consistent enforcement has created many conflicts. In regards to range staff, I feel that there should be changes made to limit conflicts of interest.

- Have completely independent and impartial third party specialists and technicians
- At the very least, rotate range staff into areas they do not live in to keep an unbiased mind and eliminate undue community pressures
- Move away from the dependency the BLM has with ranchers to supply relevant and accurate range information
- This is a conflict of interest and accurate scientific data must be gathered by BLM employees to standardized accepted practices

Comment Excerpt Text:

Just a comment on one of the roads in the Brigham planes and Wahweap area. I know you've tried to close the road running east from the Blue Cove Reservoir to Wahweap Creek, but some of my rancher friends tell me everybody goes out there anyway -- I think they're like me, they think that it's a real road, and it's been there since the 1940's so let's use it. If you want to do something useful why not close down some of the 4Wheeler tracks--those are unauthorized, usually lead to nowhere and don't serve any useful purpose. The road I'm talking about has 3 or 4 stock ponds, so it does serve a purpose, both for hikers going to the Wahweap Toadstools/Hoodoos, and stockmen. By trying to block off that road, you're aggravating a lot of people for no good reason.

Comment Excerpt Text:

Enforce seasonal removal of cattle from allotments based on a scientific approach to setting the timing of grazing seasons. End the current practice of allowing a "grace period" where ranchers can continue grazing in violation of their established season. Increase fines and penalties for not complying with the established timeframes associated with each allotment.

Comment Excerpt Text:

fencing is a critical concern. Too often fences are not properly maintained, gates are left open or in the case of the recent Peek-a-Boo cow incident, no fence existed in the first place. This is ridiculous, and the BLM should be requiring the lessees to erect and maintain fences on their allotments. The public could certainly provide information on numerous areas where existing fences, in many areas around springs and other sensitive areas, is in total disrepair.

Comment Excerpt Text:

Grazing management in particular cries out for development and implementation of improved, scientifically based practices and standards. The Monument itself holds great potential for related experimentation and development of such practices, as well as for research into the effects of grazing on the ecosystems.

Comment Excerpt Text:

There is a perception among many that the BLM too often bends to the will of State and local politicians who support and promote grazing on public land. A bias also appears to exist that favors the views of the allotment holders and protects them when they commit violation of the grazing conditions, as opposed to how other users are regarded when it comes to enforcement.

Comment Excerpt Text:

something needs to be done to find and plug the “leaks” into the Escalante River. There have been cows in trespass on the river in the vicinity of Fence Canyon and Choprock in Glen Canyon NRA each of the last three winters, including the present one.

I don't know where all of these leaks are, but Silver Falls Creek and Horse Canyon are two very likely possibilities.

Section 19.2 - Non-grazing Decisions**Comment Excerpt Text:**

2. Use of ATV's must be limited to existing fwd roads and violators fined according to existing BLM law.

Comment Excerpt Text:

Just a comment on one of the roads in the Brigham planes and Wahweap area. I know you've tried to close the road running east from the Blue Cove Reservoir to Wahweap Creek, but some of my rancher friends tell me everybody goes out there anyway -- I think they're like me, they think that it's a real road, and it's been there since the 1940's so let's use it. If you want to do something useful why not close down some of the 4Wheeler tracks--those are unauthorized, usually lead to nowhere and don't serve any useful purpose. The road I'm talking about has 3 or 4 stock ponds, so it does serve a purpose, both for hikers going to the Wahweap Toadstools/Hoodoos, and stockmen. By trying to block off that road, you're aggravating a lot of people for no good reason.

Comment Excerpt Text:

In this grazing plan commenters need to see a map of “all” the roads in Kane and Garfield Counties (monument) the original monument plan (1998) published maps that simply wished most of the roads away

Comment Excerpt Text:

Further, just because the BLM considered ACEC's in its planning process 20 years ago, it needs to revisit that question specifically from the perspective of livestock grazing.

SECTION 20 - EDITS**Comment Excerpt Text:**

Somewhere in the document it mentions cedar posts. Don't you mean juniper posts?

Comment Excerpt Text:

Page 52 Allowable Use

There are several headings of “allowable use” on this page, couldn’t they be combined under one heading?

Comment Excerpt Text:

Page 56 Action

There doesn't appear to be a section (c) in 43 CFR 4110.3-1.

§ 4110.3-1 increasing active use. When monitoring or documented field observations show that additional forage is available for livestock grazing, either on a temporary or sustained yield basis, BLM may apportion additional forage to qualified applicants for livestock grazing use consistent with multiple-use management objectives specified in the applicable land use plan.

(a) Additional forage temporarily available.

When the authorized officer determines that additional forage is temporarily available for livestock, he may authorize its use on a nonrenewable basis under § 4130.6-2 in the following order:

(1) To permittees or lessees who have preference for grazing use in the allotment where the forage is available, in proportion to their active use; and

(2) To other qualified applicants under § 4130.1-2.

(b) Additional forage available on a sustained yield basis. When the authorized officer determines that additional forage is available for livestock use on a sustained yield basis, he will apportion it in the following manner:

(1) First, to remove all or a part of the suspension of preference of permittees or lessees with permits or leases in the allotment where the forage is available; and

(2) Second, if additional forage remains after ending all suspensions, the authorized officer will consult, cooperate, and coordinate with the affected permittees or lessees, the state having lands or responsibility for managing resources within the area, the interested public, and apportion it in the following order:

(i) Permittees or lessees in proportion to their contribution to stewardship efforts that result in increased forage production;

(ii) Permittees or lessees in proportion to the amount of their grazing preference; and

(iii) Other qualified applicants under § 4130.1-2.

[71 FR 39504, July 12, 2006] Title 43 published on 2014-10-01 no entries appear in the Federal Register after this date.

Comment Excerpt Text:

Kane County supports the options listed in order of priority. Two points should be made clear. One is that it is not the prerogative of the permittee relinquishing the permit to decide or influence how the permit should be reassigned.

Second, the concept of “allocating” the forage to another use is an obsolete term leading to abuse and arbitrary, unscientific decisions, and it should have been abandoned by BLM years ago. This term makes it appear that BLM is just “dividing the pie” among various uses. Under multiple use, tradeoffs between various uses, including livestock grazing, are necessary, but to make it appear that they are just dividing the pie of forage is completely misleading and lacks any scientific basis. For example, how do you “allocate” AUMs to recreation; campers don’t eat grass. Even when considering wildlife, there is no direct connection between AUMs of forage available for livestock and the food or cover requirements for any species of wildlife, unless the forage preferences and grazing distribution of that species are identical to domestic livestock. This term should be removed from any place it occurs in this document. The real meaning is “to give preference to another use where there are conflicts with livestock grazing.”

Comment Excerpt Text:

Page 17 GCNRA Water Quality Objective 6 is numbered incorrectly. There is no objective 5. Objective 6 is not a water quality objective. Access for wildlife and recreation is a use policy not a water quality objective.

Comment Excerpt Text:

Page 34 Allowable Use

The term “allowable use” is not appropriate here. Allowable use in range management terms refers to the level of utilization considered to be “proper use” and is expressed as a percentage of the current year’s production on forage plants. AUMs are used to describe the carrying capacity, stocking rate, or amount of forage available. These sections should be re titled as “permitted use” or “authorized use”.

Comment Excerpt Text:

There are several discrepancies in the materials relating to the Draft Alternatives, which the BLM needs to correct. The first is with the map for Alternative D, which does not reflect the southern portion of Grand Bench pasture (Rock Creek Mudholes allotment) as a forage reserve. The text of Alternative D indicates this action on P.46.

Comment Excerpt Text:

In the Action to change management to improve land health before reducing AUMs or season of use, all related wording should be altered to read: " ... reducing AUMs or change season of use ..." [11]

SECTION 21 - PURPOSE AND NEED**Comment Excerpt Text:**

Alternative B would not meet the objectives or purpose and need of the MMP-A.

Comment Excerpt Text:

I believe the way the Proclamation is written: The Grazing Management Plan does not need to be revised to protect objects and values. That position should already be under the Escalante Grand Staircase Management Plan, which protects objects and values. According to the Proclamation, Grazing Management was addressed separately (and previously) than the objects and values.

Comment Excerpt Text:

Unfortunately, the current status of BLM's Purpose and Need statement, along with a range of alternatives that is insufficiently broad, demonstrates that BLM is employing a predetermined design for the direction of the livestock grazing in the Monument and, as such, fails to comply with the provisions of the National Environmental Policy Act (NEPA).

Comment Excerpt Text:

Purpose and Need

Both in-person and through written submittals, the State has requested the BLM adopt an adequate and complete Purpose and Need Statement. The statement serves as the basis for alternative development and subsequent impact analysis in the EIS, so it is extremely important to develop correctly. As currently written, the stated Purpose of the Monument Management Plan amendment is "... to identify all lands within the decision area as available or not available for livestock grazing."^[4] This statement unduly focuses the entire planning process upon what should be done, while failing to state a clear and genuine purpose and need, or the why, of the plan amendment. By stating that the Purpose and Need (or goal) of the plan is to decide where grazing will and will not occur, BLM's action has predetermined an outcome without the benefit of the complete NEPA process. The state previously offered an alternative Purpose and Need statement, which broadens the purpose of the EIS sufficiently to allow a full range of alternatives to follow.