



**NATIONAL  
CONSERVATION  
LANDS**

# **Grand Staircase-Escalante National Monument**

Resource Management Plan Environmental Impact Statement

## **Public Scoping Report**

**December 2022**



**Paria River District Office**

Bureau of Land Management

669 South Hwy 89A

Kanab, UT 84741



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The Department of the Interior protects and manages the Nation's natural resources and cultural heritage; provides scientific and other information about those resources; and honors its trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities.

The Bureau of Land Management's mission is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations.

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A	Substantive Public Comments
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## ACRONYMS AND ABBREVIATIONS

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Full Phrase

ACEC	area of critical environmental concern
BLM	Bureau of Land Management
CARA	Comment Analysis and Response Application
CFR	Code of Federal Regulations
EIS	environmental impact statement
FLPMA	Federal Land Policy and Management Act of 1976
GSENM	Grand Staircase-Escalante National Monument
MMP	monument management plan
MOU	memorandum of understanding
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPS	National Park Service
OHV	off-highway vehicle
ONA	outstanding natural area
RMP	resource management plan
RNA	research natural area
ROW	right-of-way
SITLA	State of Utah School and Institutional Trust Lands Administration
VRM	visual resource management
WSA	wilderness study area



# Chapter I. Introduction

## I.1 BACKGROUND

The Bureau of Land Management's (BLM) Paria River District Office is in the early stages of preparing a resource management plan (RMP) and an environmental impact statement (EIS) in order to provide for protection of monument objects within the Grand Staircase Escalante National Monument (GSENM) boundaries, in conformance with Proclamation 10286, issued by President Biden on October 8, 2021.

On September 18, 1996, President Clinton signed Proclamation 6920, which established GSENM and emphasized the diverse and intact physical, biological, and historic resources that provide for a science-focused national monument. This was the first time a national monument was established under the BLM's purview. GSENM is often referred to as the "Science Monument" due to its emphasis on providing for scientific research opportunities, as described in Proclamations 6920 and 10286. is often referred to as the "Science Monument" due to the emphasis on research contained in Proclamation 6920. A monument management plan (MMP) for GSENM was completed in 2000. During the initial years after the proclamation, GSENM had a large annual budget to support coordination of a science program that worked with other entities, such as universities. Over the years, this support and staffing levels were reduced.

On December 4, 2017, President Trump issued Proclamation 9682, which reduced GSENM's boundaries by approximately 50 percent. It also opened the lands excluded from GSENM, identified as the Kanab-Escalante Planning Area, to entry, location, selection, sale, or other disposition under the public land laws; disposition under all laws relating to mineral and geothermal leasing; and location, entry, and patent under the mining laws. New RMPs were completed in 2020 for both retained and newly excluded GSENM lands.

On October 8, 2021, President Biden signed Proclamation 10286, which restored the GSENM boundaries and conditions that were in place prior to December 4, 2017. Proclamation 10286 declares that the entire landscape reserved by the proclamation is "an object of historic and scientific interest in need of protection." Proclamation 10286 also states that without specific protections afforded under the Antiquities Act, the objects identified in Proclamations 10286 and 6920 are not adequately protected by the boundaries established in Proclamation 9682.

Presidential Proclamation 10286 directs that GSENM be restored "to its size and boundaries as they existed prior to December 4, 2017" to ensure "that this exceptional inimitable landscape filled with an unparalleled diversity of resources will be properly protected and will continue to provide the living laboratory that has produced so many dramatic discoveries..." Furthermore, such protection will preserve GSENM's "cultural, prehistoric, and historic legacy and maintain its diverse array of natural and scientific resources, ensuring that these values remain for the benefits of all Americans. Reservation of these lands will preserve the living laboratory within the monument boundaries that will facilitate significant scientific discoveries for years to come."

## I.2 PURPOSE AND NEED

Purposes and needs serve to frame the identification of issues, alternatives development, and effects analyses. Proclamation 10286 directs the BLM to "prepare and maintain a new management plan for the

entire monument” for the specific purposes of “protecting and restoring the objects identified [in Proclamation 10286] and in Proclamation 6920.”

The RMP’s purpose is to provide a management framework, including goals, objectives, and management direction, to guide monument management, consistent with the protection of GSENM objects and the management direction provided in Proclamations 10286 and 6920.

The following purposes are set forward in Proclamations 10286 and 6920, or they have been identified based on key present and historical GSENM management challenges. Planning for these purposes and their desired outcomes will be crucial for developing an RMP that provides direction for addressing critical current and future management challenges.

1. *Protect and restore the entirety of GSENM’s large, remote, rugged, and markedly impenetrable landscapes, including the landscapes’ extraordinary dark skies, natural soundscapes, and rich mosaic of objects of natural, historical, and scientific interest. This topic focuses on protection of GSENM as a whole, and its use as an outdoor science laboratory.*

Needs and challenges: GSENM’s immense scale and unspoiled naturalness serve as a foundation for the rest of GSENM objects, including the diversity of ecotypes, geological and paleontological resources, vegetation, and wildlife. Through the latter half of the twentieth century, Utah’s large extent of unspoiled natural, roadless areas was unique in the lower 48 states, ultimately providing for Proclamation 6920. GSENM visitation has increased steadily since its designation, mostly because of recreational use. In addition to rising visitation, Utah has had the fastest-growing population in the US in the last decade (18.4 percent). In 2021, Utah’s growth was 1.7 percent, while the national population growth was 0.1 percent<sup>1</sup>.

These increases in human presence pose diverse challenges to preserving resources (for example, adverse vegetation and soil impacts, the loss of the potential for human solitude, adverse effects on certain wildlife species, and increases in noise). Effects on resources tend to be incremental, and gradual degradation of resources over time can easily occur almost unnoticed without either overall management goals and objectives for the landscape. To retain the unique value of a largely unspoiled, natural landscape, the planning process must consider how to guard against incremental degradation due to ongoing uses.

2. *Emphasize GSENM as a living, outdoor laboratory for diverse and significant research and discovery related to GSENM’s varied resources and objects. This topic focuses on enacting a science emphasis for GSENM.*

Needs and challenges: The proclamation that originally designated GSENM in 1996 states, “[e]ven today, this unspoiled natural area remains a frontier, a quality that greatly enhances the monument’s value for scientific study.” However, the circumstances surrounding and within GSENM have changed substantially in the past 25 years. There are substantial management challenges regarding how to maintain the unspoiled naturalness essential to GSENM’s science

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<sup>1</sup> U.S. Census Bureau. 2021. Internet Website. <https://www.census.gov/library/stories/state-by-state/utah-population-change-between-census-decade.html>

purposes. Given the intensification of human-caused changes in the world, undisturbed and unaltered natural areas on the geographic scale of GSENM are increasingly essential, rare, and hard to maintain. Accordingly, GSENM is equally important for scientific understanding of the past and for understanding changes and trends that allow us to appropriately plan for and understand the future.

3. *Protect and restore GSENM's biological resources, including five life zones, a variety of habitats, and multiple ecoregions. Due largely to its remoteness and substantial variation in elevation and topography, GSENM contains unique and isolated plant communities, various floristic communities, relic and endemic plants, unique species of invertebrates, a biodiversity of bees, and diverse amphibians, birds, and mammals, including mountain lion and desert bighorn sheep. This topic focuses on broadscale, interdependent management of biological resources, including species, habitats, and ecosystems.*

Needs and challenges: Management of living individuals, populations, habitats, and interconnected communities and ecosystems must address a spectrum of needs and challenges. GSENM supports a range of ecotypes, as well as remnant, relic, and refugia populations, across the landscape's substantial range of elevation and large geographic extent. Further, climate change and drought are pushing ecological conditions outside the historical range of variability, affecting the function and resilience of vegetation and, in turn, habitat and species. A key component of this planning effort will be identifying appropriate management for changing ecotypes, populations, and habitats.

4. *Protect cultural and historic resources in GSENM and ensure tribal nations' ability to access and use traditionally sacred places and landscapes. These objects include traditional cultural places and uses considered sacred to modern tribal nations with ancestral and/or historical ties to GSENM lands, as well as a high density of archaeological sites spanning the Paleoarchaic, Archaic, Formative (Ancestral Puebloan and Fremont), Ethnohistoric (Ancestral Paiute), and post-Contact Historic periods. These objects also include numerous historic routes and trails, including Powell expedition routes and Mormon pioneer trails; historic inscriptions; ghost towns; cowboy line camps; and historic townsites. This topic focuses on the protection, management, and education/appreciation of cultural and historic resources, including tribal, public, and scientific uses of cultural resources.*

Needs and challenges: Protecting and managing cultural and historic resources often requires substantial work, such as surveys and inventories, monitoring, stabilization, and public outreach and education activities. The RMP planning process should clarify how to select and prioritize such activities; it also should consider collaboration with non-BLM entities and consultation with tribal nations that could support understanding, protection, and management of cultural and historic resources.

5. *Protect GSENM's varied and rich geology, extraordinary visual landscapes with numerous unique areas and features, and abundant, world-class paleontological resources. This topic focuses on protection, scientific use, and visual enjoyment of paleontological and geologic resources.*

Needs and challenges: Extensive scenic exploration can be accessed via paved roads, which serve as main arteries through GSENM. Paved roads are augmented by several maintained, unpaved roads and some dirt roads. The scenic geology and the opportunity for visual appreciation are relatively easy to preserve, while other uses of these resources (for example, scientific study) will



require more consideration during planning to provide for appropriate access, use, and protection. This is especially important in view of GSENM's scientific purposes.

6. *Protect the opportunity to experience a remote landscape rich with opportunities for adventure and self-discovery. While protecting GSENM objects, provide a diversity of world-class outdoor recreation opportunities, such as hiking, backpacking, hunting, canyoneering, mountain biking, and horseback riding, associated with a substantial, regional socioeconomic sector. Effectively serve visitors with diverse emphases and provide basic facilities, such as trailheads and restrooms, to ensure human health and safety. This topic focuses on sustainable recreation management given challenges due to rising visitation to GSENM's remote, fragile landscape.*

Needs and challenges: Most visitation to GSENM is recreational. While not identified as an object in need of protection, Proclamation 10286 acknowledges the world-class recreational opportunities in GSENM that support a travel and tourism sector that is a source of economic opportunity for the region. However, high and increasing levels of recreational visitation are a top management challenge, and appropriate management of recreational use is a central concern to address in the RMP. Large numbers of visitors can degrade the visitor experience, increase human safety and health issues (such as those related to human waste), and harm objects, including ecologically sensitive areas and species. A key component of this planning effort will be identifying appropriate management that will protect GSENM's objects amid rapidly rising visitation levels.

7. *Manage discretionary uses in GSENM in the context of protecting objects. GSENM lands have long served a variety of uses and purposes by tribal nations and their ancestors as well as by European settlers and their descendants. This topic focuses on identifying sustainable and appropriate uses within the context of protecting GSENM objects.*

Needs and challenges: Since the designation of GSENM in 1996, controversy and disputes have existed among stakeholders regarding the BLM's discretionary uses, particularly since, as noted above, the designation of GSENM as a national monument requires the BLM to protect the objects within GSENM's boundary. Stakeholder interests span the spectrum from supporting a wide variety of activities and uses to promoting strong preservation interests. Establishing management that best protects GSENM's objects while considering other compatible uses is vital in this planning process.

### **I.3 OVERVIEW OF THE SCOPING PROCESS AND SCOPING REPORT**

Public involvement is a vital and legally required component of the planning process. Public involvement vests the public in the decision-making process and allows for full environmental disclosure. Guidance for implementing public involvement under the National Environmental Policy Act (NEPA) is codified in 40 Code of Federal Regulations (CFR) 1506.6. This ensures federal agencies make a diligent effort to involve the public in the NEPA process.

Scoping is an early and open process that helps the BLM determine the scope of issues to be addressed and extracts the overarching issues that may be added to those addressed during the planning process. These issues help define the scope of the analysis for the RMP/EIS; they may also be used to develop the EIS alternatives

In accordance with 43 CFR 1610.2(d), the BLM must document the public scoping results. This scoping report summarizes the scoping process and the comments received during the formal scoping period.

## **I.4 DESCRIPTION OF THE SCOPING PROCESS**

As required by NEPA and its public involvement guidance, the BLM solicits comments from relevant agencies and the public. The BLM then organizes and analyzes all comments received. The agency evaluates the position statement of each comment and extracts the overarching issues that will be addressed during the planning process. These issues define the scope of the analysis for the RMP/EIS; they also are used to develop the RMP/EIS alternatives.

### **I.4.1 Notice of Intent**

As defined under NEPA, the scoping period began with the publication of the notice of intent, titled “Notice of Intent to Prepare a Resource Management Plan for the Grand Staircase-Escalante National Monument in Utah and an Associated Environmental Impact Statement for the Paria River District Office, Kanab, Utah” in the [Federal Register](#) on July 29, 2022.

The notice of intent initiated the public scoping process for the RMP/EIS. During this period, the BLM sought public comments to determine relevant issues that could influence the scope of the environmental analysis, including alternatives, and to guide the process for developing the RMP/EIS.

### **I.4.2 Preliminary Planning Criteria**

As described in the BLM’s Land Use Planning Handbook (H-1601-1), “Planning criteria guide development of the plan by helping define the decision space (or the ‘sideboards’ that define the scope of the planning effort). Planning criteria guide the development of the RMP/EIS, ensure that it is tailored to the identified issues, and help to avoid unnecessary data collection and analysis. Planning criteria also streamline the plan preparation; establish standards, rules, and measures to be used; guide and direct the resolution of issues through the planning process; and indicate factors and data that must be considered in making decisions.

Planning criteria are based on applicable laws and regulations, BLM Director and BLM State Director guidance, and the result of consultation and coordination with the public; other federal, state, and local agencies; and Native American tribes.

### **I.4.3 RMP/EIS Website**

The BLM maintains an ePlanning RMP/EIS website (<https://eplanning.blm.gov/eplanning-ui/project/2020343/510>) with information related to the development of the RMP/EIS. The website includes background documents, maps, information on public meetings, and contact information for the BLM planning team.

### **I.4.4 Public Outreach and Public Scoping Meetings**

The BLM held five public scoping meetings during the scoping process. The BLM hosted three in-person and two virtual public scoping meetings (VPMs) as part of the ongoing land use planning for GSENM. In-person meetings were an open-house style format, where attendees walked around to view resource posters, ask questions of the BLM staff and management, and submit comments by hand.

The BLM held the VPMs via the Zoom platform. Meetings began with a PowerPoint presentation describing the purpose of the RMP/EIS, the RMP/EIS approach, and opportunities for public involvement. Following the presentation, the meetings transitioned to a question-and-answer session, where members of the public could ask questions for the BLM staff. **Table I-1** provides the dates and times of the meetings. A list of public meeting attendees is available upon request.

**Table I-1: Public Scoping Meetings in 2022**

Meeting Format	Meeting Date	Meeting Time*	Number of Public Attendees
Virtual	August 17, 2022	10:00 a.m. to noon	94
In person (Escalante, Utah)	August 24, 2022	6:00 p.m. to 8:00 p.m.	82
Virtual	August 30, 2022	1:00 p.m. to 3:00 p.m.	59
In person (Kanab, Utah)	August 31, 2022	6:00 p.m. to 8:00 p.m.	30
In person (Panguitch, Utah)	September 7, 2022	6:00 p.m. to 8:00 p.m.	8

\* All times are mountain daylight time.

The BLM continually works to formalize agreements with cooperating agencies. **Table I-2** identifies agencies and entities that the BLM has invited to participate as a cooperating agency, and those who have accepted and signed a memorandum of understanding (MOU). Cooperating agencies are those that the BLM state director has agreed have the requisite jurisdiction by law or special expertise necessary to participate.

**Table I-2: Cooperating Agency Outreach, Status, and Agreement**

Agency/Entity	Paria River District Signed MOU
<b>Counties</b>	
Kane County Commission	Y
Garfield County Commission	Y
Washington County Water Conservancy District	Y
Kane County Water Conservancy District	Y
<b>Tribal Communities</b>	
All Pueblo Council of Governors	N/A
Kaibab Band of Paiute Indians	In progress
Navajo Nation	In progress
Paiute Indian Tribe of Utah	N/A
Pueblo Acoma	N/A
Pueblo of San Felipe	N/A



<b>Agency/Entity</b>	<b>Paria River District Signed MOU</b>
Pueblo of Tesuque	N/A
Zuni Tribe of the Zuni Reservation, New Mexico	N/A
San Juan Southern Paiute Tribe of Arizona	N/A
Hopi Tribe of Arizona	In progress
Ute Indian Tribe of the Uintah and Ouray Reservation	N/A
<b>Agencies</b>	
National Park Service (NPS): Intermountain Regional Office	Y
NPS: Glen Canyon National Recreation Area	Y
NPS: Capitol Reef National Park	Y
NPS: Bryce Canyon National Park	Y
NPS: Zion National Park	Y
NPS: National Historic Trails Office	Y
United States Fish and Wildlife Service	N/A
US Forest Service: Dixie National Forest	Y
US Forest Service: Fishlake National Forest	N/A
Utah's Public Lands Policy Coordinating Office	Y

Agency/Entity	Paria River District Signed MOU
State of Utah School and Institutional Trust Lands Administration (SITLA)	N/A
Utah State Historic Preservation Office	N/A

## I.5 METHOD OF COMMENT COLLECTION AND ANALYSIS

All written submissions during the NOI scoping period, regarding the NOI, AMS, public meetings, or other aspects of interest, received on or before September 27, 2022, the closing date of the NOI comment period, were evaluated and are documented in this scoping summary report. Any comments submitted after the comment period closed were considered late and are not pertinent to the scoping report.

Comment analysis is used to compile and combine similar public comments into a format that decision-makers can use to identify alternative management actions in a NEPA document. It assists the team in organizing, clarifying, and addressing technical information, in accordance with NEPA regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the NEPA process.

The process includes five main components:

- Developing a comment coding structure
- Using a comment database for comment management
- Reading and coding public comments
- Interpreting and analyzing the comments to identify issues and themes
- Preparing comment summaries

The BLM developed a comment coding structure to help sort comments into logical groups by topics and issues. The coding structure was designed to capture all comment content, rather than to restrict or exclude any ideas.

It is important to note that analyzing identical comments as a group does not reduce the importance of the comment. The NEPA regulations on scoping are clear that the scoping process is not a vote; instead, it is an opportunity to “determine the scope and the significant issues to be analyzed in depth in the environmental impact statement” (40 CFR 1501.9(e)) and to “identify and eliminate from detailed study the issues that are not significant or have been covered by prior environmental review(s)” (40 CFR 1501.9(f)(1)).

**Table I-3** provides information on the affiliation of unique submissions. Most comments received were from individuals, followed by organizations. The BLM received 416 unique written submissions during the public scoping period, comprising 1,791 unique substantive comments. Substantive comments are

those that inform the BLM of the issues to be considered in the RMP/EIS, provide information to aid in the development of alternatives, or provide information to consider for impacts of the alternatives.

**Table I-3: Unique Submissions by Affiliation<sup>1</sup>**

<b>Affiliation</b>	<b>Number of Submissions</b>	<b>Percentage of Total Submissions</b>
Organizations	41	9.9
Individuals	375	90.1
<b>Total</b>	<b>416</b>	<b>100</b>

<sup>1</sup>Calculations do not include form letters or petition signatories. All numbers are approximate.

**Table I-4** provides the specific organizations that submitted comments during the scoping effort.

**Table I-4: Unique Submissions by Organization; Federal, State, or Local Agency; or Tribe<sup>1</sup>**

<b>Organization</b>
All Ways Adventure
American Rivers
BlueRibbon Coalition
Bunting Livestock
Californians for Western Wilderness
Canyonlands Conservation District
Capital Trail Vehicle Association
Center for Biological Diversity
Coalition of American Canyoneers
Coalition to Protect America's National Parks
Colorado Offroad Trail Defenders
Dreamland Safari Tours
Garfield County, Utah
Grand Canyon Trust
Grand Staircase Escalante Partners
Grand Staircase Regional Guide Association
Grand to Grand Ultra
High Desert Backcountry Horsemen
Highway 84 LLC
Kane County Conservation Board of Directors
Kane County, Utah
Maryland Ornithological Society
National Parks Conservation Association (NPCA)
National Wildlife Federation and Utah Wildlife Federation
Navajo Nation Heritage and Historic Preservation Department
Oregonians For Wild Utah
Recreational Aircraft Foundation
Rough Riders ORC
Shining Horizons Land Management
Southernmost EAA Chapter 1241
Star Ranch LLC
State of Utah, Public Lands Policy Coordinating Office
The Pew Charitable Trusts
The RAF
The Recreational Aviation Foundation
The Wilderness Society



Organization
U.S. EPA Region 8
University of Tampa
Utah Native Plant Society
Ute Mountain Ute Tribe
Wasatch Mountain Club
Western Resource Advocates (WRA)
Wichita 4x4 club
WWP
<sup>1</sup> Some letters were cosigned by multiple entities.

Substantive comments received during the public comment period do one or more of the following:

- Raise issues the BLM has not considered or reinforce issues the BLM has already identified
- Present information that can be used when the BLM considers the impacts of alternatives
- Raise concerns, with reasoning, regarding public land resources in the planning area
- Question, with reasonable basis, the accuracy of information in an existing report

The BLM reviewed each substantive comment to determine whether it pertained to an issue that will be resolved through the current RMP/EIS and assigned the substantive comment to one of three classifications, as follows:

1. In-scope general comments related to the RMP/EIS
2. In-scope specific comments related to a resource topic
3. Out-of-scope comments that are not related to the RMP/EIS, that are beyond the scope of the RMP/EIS, or that include national policy or administrative action

All comments within categories 1 and 2 were further classified by commenter, delivery type, and issue category, as described in **Chapter 2**. Comments were next entered into the Comment Analysis and Response Application (CARA) database for analysis. The BLM used the CARA database to manage all public comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondence and comments received, sorting and reporting comments by a topic or issue, and demographic information regarding the comment sources.

The results of the comment analysis are described in **Chapter 2, Comment Submission Summary**.

To ensure public comments were properly registered and that none were overlooked, the BLM used a multiphase management and tracking system. Written submissions were given a unique identifier and were logged into the system. The BLM then reviewed each submission, and individual comments were extracted.

In this report, a *comment submission* refers to a unique letter, email, website entry, or hardcopy comments received by the BLM during the public comment period. A *comment* refers to a substantive statement identified within the comment submission. The BLM initially reviewed each submission as a whole to specifically identify the following:

- Submissions that were considered out of scope, as they did not pertain to the plan at all (for example, a submittal pertaining to another project or seeking employment opportunities)
- Submissions requiring immediate attention, such as submittals containing requests for maps, geographic information systems data, or other data; official Freedom of Information Act requests; requests for a comment period extension; threats; or other comments that needed to be brought to the BLM's attention immediately
- Form letters (standardized and duplicated letters that contain identical or nearly identical text) and "form plus" submissions, which are form letters that slightly deviate from a standard form letter by containing similar text that is not identical to a master form letter submission. Form plus submissions are tallied in the total submission count but are not counted as individual unique comments unless they contain additional substantive text.

Substantive comments raise, debate, or question a point of fact or policy. Comments that merely support or oppose a proposal or that only agree or disagree with BLM policy are not considered substantive. All substantive comments identified were grouped by similar issue topics; those comments are summarized in **Chapter 3**.

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## Chapter 2. Comment Submission Summary

The BLM received a total of 3,543 submissions during the scoping period (see **Table 2-1**). Most comment submissions were form letters, followed by 416 unique submissions.

**Table 2-1: Submittal Summary by Type**

Delivery Type	Number of Submissions
Unique submissions	416
Form letters	3,127
<b>Total</b>	<b>3,543</b>

The BLM received most comment submissions via the ePlanning website, followed by those submitted through email (**Table 2-2**). After all submissions were collected, submissions that were not identified as form letters were uploaded to the CARA database. **Table 2-2** displays submission by delivery type.

**Table 2-2: Unique Comment Submissions by Delivery Type**

Delivery Type	Number of Submissions
CARA	372
US Mail	7
Email	37
<b>Total</b>	<b>416</b>

Note: **Table 2-2** does not include form submissions in the delivery type.

**Table 2-3** summarizes the distribution of comments and submissions by issue category. These issue categories are outlined further in **Chapter 3**, which presents summaries of the substantive comments included in **Appendix A**.

**Table 2-3: Comments by Issue Category**

Issue Category	Number of Comments*	Percentage of Total Comments
<b>NEPA</b>	3	0.2
Process	3	0.2
Collaboration, coordination, and partnerships	24	1.3
Cooperating agency relationships	7	0.4
Government-to-government consultation	20	1.1
Public Outreach	5	0.3
Purpose and Need	12	0.7
Planning Criteria	18	1.0
Alternatives	5	0.3
Whole alternative proposed	10	0.6
Component of alternative proposed:	3	0.2
Recreation	110	6.1
Vegetation	40	2.2
Specially Designated Areas	35	1.9

Issue Category	Number of Comments*	Percentage of Total Comments
Grazing	82	4.5
Cultural Resources	27	1.5
Other	11	0.6
Noise	13	0.7
Lands and realty	10	0.6
Fire and fuels	8	0.4
Forestry and woodland products	11	0.6
Water resources	24	1.3
Travel management	108	6.0
Visual	20	1.1
Socioeconomics	7	0.4
Special status species and habitat	36	2.0
Soils	14	0.8
Climate change	7	0.4
No action alternative	4	0.2
Range of alternatives	57	3.2
Data and Science	32	1.8
Effects analysis	1	0.1
Direct, Indirect	5	0.3
Cumulative Impacts Analysis	19	1.1
Resource & Area Mgmt	1	0.1
Monitoring	11	0.6
Inventories, mapping, GIS	10	0.6
Mitigation	7	0.4
<b>BLM Plans, policies, and programs</b>	—	—
Other BLM guidance, plans, and policies	14	0.8
<b>Relevant Federal, State, Local Laws and Regulations</b>	1	0.1
Federal laws/regulations	—	—
FLPMA	9	0.5
National Historic Preservation Act	2	0.1
Taylor Grazing Act	1	0.1
Endangered Species Act	2	0.1
Other	16	0.9
State laws/regulations	2	0.1
Local laws/regulations	1	0.1
Executive orders	8	0.4
Proclamations 10286 & 6920	11	0.6
<b>Relevant Federal, State, and Local Plans, policies, and programs</b>	—	—
Federal plans, policies, and programs	2	0.1
State plans, policies, and programs	7	0.4
Local plans, policies, and programs	11	0.6
<b>Issues and analytical framework</b>	—	—
Air quality	7	0.4
Climate change	18	1.0
Cultural resource management, native American religious concerns, and tribal use	6	0.3
Cultural resources	24	1.3
Tribal concerns/use	42	2.3

Issue Category	Number of Comments*	Percentage of Total Comments
Environmental justice and social and economic values	4	0.2
Socioeconomic	13	0.7
Environmental Justice	10	0.6
Forestry and woodlands	7	0.4
Fire and fuels	25	1.4
Fish and wildlife	8	0.4
General	37	2.1
Special status fish and wildlife species	19	1.1
Hydrology	15	0.8
Groundwater	6	0.3
Surface water	6	0.3
Wetlands	2	0.1
Riparian areas	12	0.7
Water quality	11	0.6
Water rights	1	0.1
Lands and realty	28	1.6
Lands with wilderness characteristics	12	0.7
Landscape characteristics	30	1.7
Paleontology and geology	12	0.7
Rangeland health and livestock grazing management (Proclamations 10286 & 6920)	116	6.4
Recreation use and visitor services	124	6.9
Soils and biological soils crust	21	1.2
Special designations	4	0.2
Wilderness and wilderness study areas	30	1.7
ACECs	13	0.7
Wild and scenic rivers	8	0.4
SRMAs and ERMAs	2	0.1
Other special designations	21	1.2
Vegetation	37	2.1
Terrestrial habitat, vegetation resilience, and conservation	6	0.3
Noxious weeds and invasive nonnative plants	21	1.2
Special status plant species	9	0.5
Travel, transportation, and access management	99	5.5
Wild horses	2	0.1
Minerals & geologic resources	7	0.4
Noise	22	1.2
<b>Total</b>	<b>1,804</b>	<b>100</b>

\* This number reflects the total number of comments received for a particular category. Unique comments may apply to more than one category, and multiple comments can be identified from one submission.



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# Chapter 3. Issue and Concern Statements and Comment Summaries

For the purpose of the BLM's NEPA analysis, an "issue" is a point of disagreement, debate, or dispute with a proposed action based on some anticipated environmental effect. The BLM will use the issues and other information collected in the early planning and scoping phases to help formulate a range of reasonable alternatives for the RMP that will be analyzed during the NEPA process.

The issue statements and concerns presented below are preliminary and are based on the best information known to date. Issues are separated by which resource areas, uses, or processes the BLM should consider. The BLM also has developed a summary of the comments received that apply to each issue or concern.

Several comments were identified as out of scope for this effort, or they would be addressed during tiered NEPA efforts at the site-specific level. Examples of out-of-scope comments are as follows:

- The BLM should consider the designation of new wilderness study areas (WSAs). The BLM does not have the authority to designate new WSAs, and this recommendation does not meet the RMP/EIS's purpose and need.

Examples of site-specific comments are as follows:

- Requests for surveys or inventories
- Questions about specific treatment areas or location-specific calculations
- Requests for details that would not be feasible to provide at the programmatic level
- Questions about decisions that would be made during RMP/EIS implementation

The BLM does not provide an issue statement or discussion of consideration during the NEPA process for out-of-scope or site-specific comments.

The process of developing this RMP/EIS will afford opportunities for collaboration with local, state, federal, and tribal governments; land management agencies; public interest groups; and public land users. As a result, the BLM may need to refine these issues and concerns to reflect public comments and concerns.

The comments identified in the public's submissions are summarized in the sections below. The substantive comments have been grouped into topics and summarized to reflect how they become part of the BLM's issues or concerns to address during the planning process. Not all comment summaries contain specific issue statements for the BLM to identify and address. Certain comment summaries contain a group of concerns from commenters that warrant disclosure to the BLM. These can include concerns about specific resources, resource uses, and issues. **Section 3.1** comment summaries and concern statements reflect commenters' questions, disagreements, or concerns over the RMP/EIS. Issue statements are more specific comments about an issue that needs additional analysis during the EIS. Not

all of these are specific issues that need to be addressed in the RMP/EIS; rather, they provide the BLM with a framework for moving forward in the development of the RMP/EIS. Some comments identified in the public's submissions fell outside the scope of the planning process and will not be addressed further; those comments are identified in [Section 3.8](#).

### **3.1 BLM PLANS, POLICIES, AND PROGRAMS**

#### **3.1.1 Other BLM Guidance, Plans, and Policies**

***Concern: Will the BLM apply guidance from the Bears Ears Inter-Tribal Coalition's Tribal Land Management Plan for Bears Ears National Monument to the GSENM RMP?***

*Comment Summary*

One commenter recommended that the BLM follow the guidance outlined in the Bears Ears Inter-Tribal Coalition's Tribal Land Management Plan for Bears Ears National Monument.

***Concern: How will the BLM apply the GSENM RMP from 2000 to the current RMP?***

*Comment Summary*

One commenter expressed that the 2000 GSENM RMP remains sufficient and applies to the current issues, particularly the differing perspectives from the National Conservation Lands System's mission and proclamation and the Federal Land Policy and Management Act (FLPMA).

***Concern: Will the BLM adhere to management standards and policies for managing national monuments under Secretarial Order 3308?***

*Comment Summary*

Multiple commenters argued that the BLM is obligated to adhere to management standards and established policies under Secretarial Order 3308 to ensure that lands within GSENM are managed for conservation and protected for future use.

***Concern: Will the Monz Recreation Report be applied to GSENM?***

*Comment Summary*

Commenters recommended that the BLM use components of the Monz Recreation Report to provide a zoned approach that concentrates recreation and visitor use in front-country locations and protects primitive backcountry experiences.

***Concern: How will the BLM incorporate the existing BLM Manual 6220<sup>1</sup> into the plan?***

*Comment Summary*

Multiple commenters requested for the BLM to incorporate BLM Manual 6220 into the RMP process because it establishes conservation standards for national monuments. They argued that BLM Manual 6220 provides several objectives, standards, goals, and guidelines to be incorporated into GSENM.

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<sup>1</sup> BLM Manual 6220—National Monuments, National Conservation Areas, and Similar Designations  
[https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter\\_blmmanual6220.pdf](https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter_blmmanual6220.pdf)

## **3.2 RELEVANT FEDERAL, STATE, AND LOCAL LAWS AND REGULATIONS**

### **3.2.1 FLPMA**

**Concern:** *How does the BLM plan to mitigate multiple-use versus specific-use concerns under FLPMA?*

*Comment Summary*

Multiple commenters pointed out the discrepancies between the FLPMA designation of multiple use and actual monument designations of specific use. Commenters asked the BLM to specify the restrictions of FLPMA on land uses in GSENM. One commenter noted GSENM was designed for overall protection and under FLPMA, GSENM's protections are not properly upheld. One commenter requested that the BLM uphold the FLPMA regulation of working with state and local governments when planning for land usage.

Other commenters noted that under FLPMA, livestock grazing should be a continued activity as directed under the FLPMA's multiple-use mandate.

### **3.2.2 Taylor Grazing Act**

**Concern:** *Will the BLM follow the regulations set forth by the Taylor Grazing Act?*

*Comment Summary*

A commenter noted that the Taylor Grazing Act established grazing rights for ranchers and requested that the RMP comply with all provisions of the Taylor Grazing Act.

### **3.2.3 National Historic Preservation Act (NHPA)**

**Concerns:** *Does the BLM plan to consult with tribes in any aspects related to the NHPA, and respond to any issues with MOUs? Does the BLM plan to integrate traditional tribal knowledge into the RMP? How does the BLM plan to identify sites eligible for the National Register of Historic Places?*

*Comment Summary*

Commenters stated that tribal consultation regarding cultural resources is required under Section 106 of the NHPA. Commenters expressed the need for traditional knowledge within the RMP process, especially within the cultural resources sections. Commenters emphasized that by following the NHPA, the BLM could better avoid or minimize any effects on cultural resources or archaeological sites in GSENM. Commenters recommended that the RMP should include a summary of all tribal coordination efforts for the RMP.

### **3.2.4 Endangered Species Act**

**Concern:** *What methods does the BLM plan to implement to inventory endangered species in GSENM?*

*Comment Summary*

Commenters emphasized that all species listed under the Endangered Species Act should have site-specific data along with their historical range and known habitats. Commenters recommended protecting small portions of GSENM where Endangered Species Act species occur, rather than the entire GSENM.

### 3.2.5 Other Federal Laws and Regulations

**Concern: Will the Supreme Court decision from *West Virginia vs. Environmental Protection Agency* be applied to GSENM?**

*Comment Summary*

A commenter recommended that the Supreme Court decision resulting from *West Virginia vs. Environmental Protection Agency* be applied to GSENM. Unless explicit congressional authorization has been provided, the BLM might not have the regulatory authority to create certain rules, such as travel management and off-highway vehicle (OHV) designations.

**Concern: How will the BLM prioritize the GSENM Antiquities Act Proclamation?**

*Comment Summary*

Many commenters expressed the need to incorporate additional language from the Antiquities Act into the RMP to ensure the conservation, protection, and restoration of GSENM. Commenters argued that the Antiquities Act should supersede FLPMA, especially regarding multiple uses. One commenter also noted that the GSENM landscape is an object of historic and scientific interest requiring protection under the Antiquities Act.

**Concern: How will the BLM apply the Omnibus Public Land Management Act of 2009 to the RMP to establish GSENM as part of the National Conservation Lands System?**

*Comment Summary*

Commenters recognized that the notice of intent list of statutory and legal directions for issuing the notice of intent omits any reference to the Omnibus Public Land Management Act of 2009, even though Proclamation 10286 directs that GSENM be managed as a unit of the National Conservation Lands System. Commenters urged the BLM to incorporate the Omnibus Public Land Management Act of 2009 improvements to GSENM in the RMP.

**Concern: How shall GSENM paleontological resources be curated, managed, and transacted to best serve GSENM purposes?**

*Comment Summary*

In conjunction with the Paleontological Resources Preservation Act, one commenter recommended that all specimens, fossils, and removed objects be stored at local museums and heritage centers in Garfield and Kane Counties. The commenter also recommended that any specimens, fossils, and removed objects known to have been transferred elsewhere should be returned.

**Concern: How will resources be protected under the Federal Land Exchange Facilitation Act?<sup>2</sup>**

*Comment Summary*

One commenter argued that under the Federal Land Exchange Facilitation Act, noneconomic scientific, historic, cultural, scenic, recreational, and natural resources, including ancient Native American archaeological sites and rare plant and animal communities, and values that include or are directly dependent on water resources on or within exchanged lands must be protected from harmful activities in the same way that they are protected under the Antiquities Act. The commenter stated that

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<sup>2</sup> Federal Land Exchange Facilitation Act of 1988:

<https://www.ntc.blm.gov/krc/uploads/984/Federal%20Land%20Exchange%20Facilitation%20Act%201988.pdf>

Proclamation 6920 safeguards GSENM objects within GSENM's original boundaries, and the BLM may not contradict or ignore congressional action relative to the management of public lands; therefore, the BLM must manage the exchanged lands and the lands adjacent to the exchanged lands per the Land Exchange Act.

### **3.2.6 Executive Orders**

***Concern: How will the BLM adhere to recent executive orders that protect all populations' ability to access and use public lands?***

#### *Comment Summary*

Commenters pointed out that the BLM is required by executive order to consider environmental justice in the NEPA process to determine whether route closures would disproportionately harm disabled people's access to public lands. They urged the BLM to incorporate all relevant executive orders protecting the right to public access. One commenter noted that the elimination of motorized access would likely be contrary to Executive Order 13007, Executive Order 13985, and the American Indian Religious Freedom Act.

***Concern: Will the BLM comply with Executive Order 13007 to accommodate access to, and allow ceremonial use of, sacred sites and avoid adversely affecting these sites?***

#### *Comment Summary*

One commenter highlighted the importance of abiding by Executive Order 13007 to allow access to and to protect sacred sites. The commenter recommended addressing the existing Native American sacred sites in GSENM that may be considered spiritual by tribal nations; the commenter also recommended ensuring that the proposed action would avoid or mitigate the impacts on the physical integrity, accessibility, or use of these sites.

### **3.2.7 State Laws and Regulations**

***Concern: How will the BLM address the State's authority over wildlife?***

#### *Comment Summary*

One commenter noted that the State of Utah has the authority to protect and manage all wildlife within its borders and that the State requires access by vehicles and equipment to protect, conserve, and manage wildlife. The commenter argued that the State must be involved in developing and mitigating potential impacts on wildlife.

### **3.2.8 Local Laws and Regulations**

***Concern: Will the BLM plan to coordinate with local and state governments during the RMP process?***

#### *Comment Summary*

A commenter recommended that local governments should be included in the RMP process, regardless of whether they are designated cooperating agencies. The BLM should coordinate existing local government plans with the new RMP.



### **3.2.9 Proclamations 10268 and 6920**

**Concern:** *Will the BLM support the proposed objectives set out in Proclamation 10268, as well as those in Proclamation 6920?*

*Comment Summary*

Most commenters focused on Proclamation 10268, with most support of that proclamation's objectives. These commenters pointed to the protection of monument objects declared in Proclamation 10268 as important to the goals of GSENM.

## **3.3 RELEVANT STATE AND LOCAL PLANS, POLICIES, AND PROGRAMS**

### **3.3.1 State Plans, Policies, and Programs**

**Concerns:** *How does the BLM plan to integrate existing state plans, policies, and programs into the new RMP?*

*Comment Summary*

Multiple commenters urged the BLM to incorporate the Utah State Resource Management Plan and the Utah County RMP when drafting the range of alternatives and the new RMP. Commenters noted that the BLM must follow Utah legislation's restrictions set on construction efforts in GSENM and follow all relevant state statutes in developing the RMP.

### **3.3.2 Local Plans, Policies, and Programs**

**Concern:** *How will the BLM address consistency issues with local county RMPs and support local resources related to GSENM visitation?*

*Comment Summary*

Commenters expressed concern about conflicts between what is written in Kane County's RMP and Enhanced Grazing Plan and GSENM land management guidance. Commenters noted that the Kane County RMP is inconsistent with Proclamation 10286. They argued that the economic viability of certain industries, such as livestock grazing, could be diminished and threatened by federal land management decision-making.

One commenter was concerned that monument designation may bring more backcountry recreationists to the area, which may place a higher demand on local, volunteer search-and-rescue and emergency response. The commenter argued that existing plans do not account for the influx of recreationists and requested clarity on how the BLM will support these overburdened local emergency services.

One commenter wanted the BLM to analyze county plans to chip seal Hole-in-the-Rock Road, which the commenter believed is an urgent necessity.

## **3.4 EFFECTS ANALYSIS**

### **3.4.1 Direct and Indirect**

**Concern:** *How will the BLM analyze the direct and indirect impacts of OHV use on GSENM?*

*Comment Summary*

Two commenters with differing viewpoints on OHV use urged the BLM to properly and thoroughly analyze how OHVs alter the GSENM landscape to assess the true magnitude of direct and indirect impacts.

### 3.4.2 Cumulative Impacts

**Concern: How will the BLM analyze and adequately review the cumulative impacts associated with all motorized closures on recreation opportunities and access?**

*Comment Summary*

A commenter expressed concerns that the closure of routes over the decades has led to significant negative cumulative impacts on GSENM's recreation opportunities and experiences. The commenter argued these closures were fully under the Council on Environmental Quality's significance test and emphasized that closures reduced use, the health of the public land, and the health of the public. The commenter urged the cumulative analysis to consider route closures on overall opportunities and access.

**Concern: How will the BLM evaluate and disclose the significant cumulative effects that management decisions have had on GSENM over the years.**

*Comment Summary*

A commenter requested that the BLM review and analyze how the cumulative impacts of management actions have affected various resources on GSENM.

**Concern: The BLM must review the cumulative impacts of front-country use on GSENM's other critical resources.**

*Comment Summary*

A commenter argued that the cumulative analysis should consider the cumulative impacts of front-country uses on other resource areas.

**Concern: The BLM must consider the combined cumulative impacts associated with past, present, and future activities.**

*Comment Summary*

A commenter argued that all connected actions should be designed in compliance with Council on Environmental Quality regulations; the commenter emphasized the need to consider the impact of management activities and how areas have been affected by past activities, are being affected by present activities, and may be affected by future activities. Commenter also recommended the BLM consider the cumulative impact that climate change has on resources in GSENM and review and mitigate for them in the analysis.

## 3.5 RESOURCE AND AREA MANAGEMENT

### 3.5.1 Resource and Area Management (General)

**Concern: How will the BLM evaluate science research proposals, apply findings to GSENM management, and track cumulative effects of research conducted?**

*Comment Summary*

Commenters expressed concern regarding scientific research conducted on GSENM; they also argued that the data are not being used in management decisions. They argued that the BLM should maintain a robust geospatial database of where research permits are granted, so more accurate spatial and temporal analyses can be performed to evaluate cumulative effects.

### **3.5.2 Monitoring**

#### ***Concern: How does the BLM plan to monitor on a site-specific level?***

##### *Comment Summary*

Commenters expressed concern about expanding monitoring efforts to more specific levels to see impacts more accurately. Multiple commenters requested using site-specific scientific data when discussing levels of impact and change from both human and motorized activities. Multiple commenters requested allowing comparisons between natural, undisturbed sites and disturbed sites.

#### ***Concern: How will the BLM develop a comprehensive monitoring plan that can adjust grazing strategies?***

##### *Comment Summary*

Multiple commenters suggested that increased monitoring needs to occur in allotments where grazing occurs.

#### ***Concern: Will the monitoring efforts include the rare plant species in GSENM?***

##### *Comment Summary*

Multiple commenters expressed concern about various rare plants, including sensitive species; they requested scientific research and monitoring of those species.

### **3.5.3 Inventories, Mapping, and Geographic Information Systems**

#### ***Concern: How will the BLM incorporate recent mapping and GIS studies and inventories into the RMP?***

##### *Comment Summary*

Multiple commenters stated that since 1996, new research has been conducted in GSENM. They expressed concern about additional previous studies being overlooked and not incorporated. Commenters stressed the importance of historical data sets to establish a baseline for areas of concern.

#### ***Concern: Will the BLM implement site-specific monitoring, research, and evaluations?***

##### *Comment Summary*

A commenter expressed concern that various types of site-specific data are necessary to complete a comprehensive plan without overgeneralizing the area. The commenter argued this would create a more robust analysis.

#### ***Concern: Does the BLM plan to use site-specific data to perform evaluations on each route in GSENM?***

##### *Comment Summary*

A commenter suggested giving surveys to motorized vehicle users to help determine the quality of the route, overall experience, rate of use, and demographics of users. The commenter argued that proper route analysis cannot be performed without these types of data; therefore, routes should not be closed without these types of results.

### **3.5.4 Mitigation**

**Concern: *What methods of mitigation does the BLM plan to use to protect resources in GSENM?***

*Comment Summary*

Multiple commenters suggested specific grazing mitigation methods. Commenters recommended grazing buffer zones around sensitive areas, such as riparian zones; methods to discourage cattle from congregating around waterbodies; advanced monitoring for water resources; and other methods to protect water resources. Commenters also suggested that the BLM defer grazing on allotments without adequate protections for vegetation, soil, and water resources.

**Concern: *How does the BLM plan to mitigate the impacts of visitors on GSENM?***

*Comment Summary*

A commenter suggested opening a larger percentage of GSENM to motorized activities to lessen the impact of high visitor usage in current areas. Another commenter asked the BLM to consider how the motorized closures will negatively affect young, disabled, and elderly people. The commenter also suggested mitigating visitor impacts by developing more campgrounds and designated trails and by becoming stricter on permitting visitor usage. Multiple commenters suggested a specific threshold that would trigger mitigation measures when it is reached. Multiple commenters suggested detailed mitigation plans for all impacts found in the RMP.

## **3.6 NEPA**

### **3.6.1 NEPA (General)**

**Concern: *The BLM must take Section 101(b)(5) of NEPA into account when discussing closing motorized routes.***

*Comment Summary*

Commenters noted that all facets of the NEPA process must be considered when writing the new RMP.

### **3.6.2 Process**

**Concern: *How does the BLM plan to follow NEPA objectives while also tailoring to the GSENM RMP specifically?***

*Comment Summary*

A commenter stated that the RMP's planning duration should be tailored specifically to the GSENM timeline rather than using the average 10-year lifespan. Another commenter expressed concern for the RMP to follow the legally required NEPA procedure while also taking GSENM into account.

### **3.6.3 Collaboration, Coordination, and Partnerships**

**Concern: *What government agencies, nonprofits, and local stakeholders does the BLM plan to engage and cooperate with in the development of the GSENM RMP?***

*Comment Summary*

Multiple commenters noted the importance of engaging a wide range of stakeholders in this process to take a collaborative approach to the plan. Commenters noted that this level of coordination can help the BLM achieve ecological goals, land management actions, and monument maintenance and monitoring. In particular, commenters noted that the BLM should coordinate with local officials from Kane and Garfield Counties, interested nonprofit organizations, residents and business owners (including ranchers

that depend on livestock grazing), tribes, nearby NPS staff, and scientific experts. Commenters recommended the following list of organizations for the BLM to collaborate with in this planning process:

- Dr. Walter Fertig, Laura Welp, and Dr. Stanley Welsh (experts in GSENM flora)
- Environmental Protection Agency
- Garfield and Kane Counties
- Gerkane Energy Cooperative
- Grand Canyon Trust
- Grand Staircase Escalante Partners
- Navajo Nation Heritage and Historic Preservation Department
- NPS managers and staff in adjacent parks (Capitol Reef, Bryce Canyon NP, etc.)
- Recreational Aviation Foundation
- South Central Communications
- South Central Utah Telephone Association
- Utah Backcountry
- Utah Division of Wildlife Resources
- Utah Wilderness Association
- Wasatch Mountain Club
- Wilderness Volunteers

One commenter would like the BLM to consult with NPS officials to help shape the management of the adjacent landscape and to protect resources from harmful impacts; this consultation would help ensure that the management of GSENM lands that are adjacent to national parks is consistent with the NPS's management.

#### **3.6.4 Cooperating Agency Relationships**

***Concern: How will the BLM ensure that the GSENM RMP is consistent with the state and local RMPs?***

##### *Comment Summary*

Commenters expressed concern that the BLM is excluding the involvement of cooperating agencies from the planning process to meet the RMP's strict time line. Commenters urged the BLM to provide a high level of coordination with cooperating agencies, as well as state and local government participation, throughout the planning process, especially during the alternative's development phase.

***Concern: Will the BLM coordinate with cooperating agencies to address challenges with wildlife and sensitive species?***

##### *Comment Summary*

Commenters recommended that the BLM partner throughout the development of the GSENM RMP to help address issues related to wildlife management in GSENM and to identify species that need to be considered.

### **3.6.5 Government-to-Government Consultation**

**Concern:** *How will the BLM incorporate meaningful tribal consultation throughout the planning process?*

*Comment Summary*

Several commenters expressed the need for meaningful consultation with tribal nations for the assessment, protection, and management of historic properties and sites with cultural significance. Commenters requested early engagement with tribal nations to prioritize traditional, ecological knowledge and to better protect cultural resources and values. Recommendations regarding increased tribal consultation included:

- Cooperating with the Navajo and Ute Mountain Tribe to prioritize and manage essential resources in GSENM
- Incorporating tribal representatives in co-stewardship to help with the management of GSENM
- Establishing an inter-tribal advisory group and hiring an Indigenous tribal liaison to support tribal engagement
- Completing ethnographies to provide critical information about how to best manage cultural resources and sacred sites
- Completing cultural resources inventories and surveys to identify resources with historic and cultural significance within GSENM
- Implementing information-sharing policies and procedures to ensure sensitive information is protected
- Establishing a new agreement between the BLM, State Historic Preservation Office, and the tribes to share the findings of sensitive information

### **3.6.6 Public Outreach**

**Concern:** *What public outreach opportunities does the BLM provide?*

*Comment Summary*

Commenters expressed the need for a platform to bring all aspects of the public and stakeholders' interests together to collaborate on important resources.

### **3.6.7 Purpose and Need**

**Concern:** *Will the BLM clarify the main purpose of the RMP/EIS?*

*Comment Summary*

Multiple commenters expressed confusion about the RMP/EIS's actual main purpose. Multiple commenters cited it as grazing, while others cited recreation. One commenter requested that the BLM make GSENM's protection the RMP/EIS's main purpose over other factors. Multiple commenters stated that the purpose and need should be amended to specifically reference recreation opportunities. Generally, all commenters stated that the purpose and need statement was not inclusive or clear, and they urged the BLM to reconsider it.



### **3.6.8 Planning Criteria**

***Concern: How will the EIS analyze and consider measures to ensure that objects are conserved, protected, and restored?***

*Comment Summary*

Multiple commenters expressed concerns regarding the impairment of objects in GSENM. Commenters would like the BLM to define a measurable threshold that determines when use or action would impair GSENM.

***Concern: Will the BLM consult with the GSENM-affiliated tribes to ensure the protection of recognized traditional uses?***

*Comment Summary*

One commenter expressed the need for tribal consultation to ensure that the protection of recognized traditional uses is consistent with other planning criteria and follows the GSENM's purpose.

***Concern: Will there be criteria for measuring the degrees of protection?***

*Comment Summary*

One commenter noted that the MAS does not describe quantitative or qualitative criteria for measuring the extent to which the mandated level of protection would be achieved. The commenter also noted that several of the proposed preliminary alternatives focus on possible changes to discretionary uses within GSENM, which have no direct relationship to the protective purposes mandated in the proclamation.

***Concern: Will the RMP include language that addresses conflicts between visitors and cattle?***

*Comment Summary*

One commenter requested that criteria for removing regular or emergency use be described in the RMP as well as criteria that will be used to allow for or restrict range improvements, change grazing practices, and mandate restoration practices.

***Concern: How will the BLM address ecology and conservation in the RMP?***

*Comment Summary*

Commenters suggested that science should be applied to the RMP to address ecological and conservation issues. One commenter explained that ecological and conservation sciences have developed quantitative, objective criteria for measuring ecological and environmental health; these criteria can be applied to the RMP/EIS. Another commenter requested that grazing, off-road vehicle use, existing mineral extraction, and heavy visitation are activities that must be scrutinized intensively and limited where they might lead to the degradation of resources; the commenter suggested that peer-reviewed, evidence-based scrutiny and adaptive management should be applied to the RMP/EIS. Finally, one commenter requested that the proposed preliminary alternatives be redesigned to describe how anticipated land use will result in changes to established measures of ecological health.

### 3.6.9 Alternatives

#### **Concern: *What alternatives will the BLM seriously consider?***

##### *Comment Summary*

Commenters requested that the BLM formulate alternatives that meet the RMP's purpose and need. A commenter suggested that the alternatives must meet the regulations and ideas put forward in the analysis of the management situation. Multiple commenters noted that the alternatives need to be amended to include recreation impacts. Multiple commenters stated that alternatives need to be adjusted to go into a deeper discussion on the potential closing of routes. Commenters offered several recommendations for whole alternatives. Some examples include, but are not limited to:

- Choose the most protective management alternative that also recognizes tribal communities and ensures a healthy monument and a vibrant, sustainable tourism economy.
- Develop an alternative that allows full vehicle and equipment access for wildlife conservation efforts.
- Write the need for facilities that are available throughout GSENM into the stewardship responsibility section of alternatives.
- Give Kane and Garfield Counties discretionary authority over emergency services within GSENM.
- Increase language in the alternatives regarding new air technology, such as drones and satellite imagery.
- Increase recreation support such as restrooms, sanitation, parking, trail maintenance, and signage.
- Develop practical ways to reduce visitor-related impacts as visitation rates continue to increase.
- Directly mention that this plan includes the possibility of opening more lands to timber harvesting, mining, livestock grazing, and oil and gas.
- Perform studies before adding uses to determine whether the new use is compatible with the existing uses; ensure all these studies have a defined end date.
- Change the language in the document from “could” to “should” when referring to maintaining or improving trails.

#### **Concern: *Will an alternative be incorporated that allows for more access and multiple uses?***

##### *Comment Summary*

One commenter proposed a new alternative that would allow more access to GSENM, without restricting or closing opportunities, and that would return and keep multiple uses as a priority in the plan.

### 3.6.10 No Action Alternative

#### **Concern: *Will the BLM seriously consider the No Action Alternative as a viable option?***

##### *Comment Summary*

A commenter noted that the No Action Alternative is the best plan.

### **3.6.11 Components of the Alternative Proposed**

#### **Recreation**

**Concern: What strategies will the BLM use to manage recreation, and how do these vary across the range of alternatives?**

##### *Comment Summary*

Some commenters requested that, while recreation and public access are important, they must never take priority over scientific resources and the protection of GSENM objects and values. Other comments recommended that the RMP accommodate the continuing increase in backcountry visitation while protecting scientific values and resources. Recreation management should account for conservation, especially in the wilderness. On the other hand, other commenters requested that the agency adequately consider an alternative that would maximize recreation opportunities in proportion to the needs of actual visitors to the RMP/EIS area.

Other commenters requested that the BLM develop a recreation plan as a part of the RMP process. They added that the plan should integrate commercial guides, guidebook authors, and local outfitting businesses into their plans for visitor communication and education.

Finally, many commenters requested the BLM manage recreation according to management zones developing in the previous RMP, including front country, passage, and back country zones. These management zones would be used to identify areas where recreation improvements and facilities could be developed or expanded to meet future recreational needs. Recreation facilities would be developed in these passage zones, or areas like Hole in the Rock Road and Cottonwood Road. Commenters added that priority needs to be made to clean-up de facto campgrounds on Highway 12 and Hole-in-the-Rock Road. Other suggestions related to management zones included the following:

- Within passage and outback zones outside of developed campgrounds, dispersed camping will be managed to “designated dispersed” sites only, which will be chosen and marked based on their lack of impact on GSENM objects and values.
- Group size will be limited to 25 people in the Passage and Outback Zones.
- In the Primitive Zone, the group size will be limited to 12 people and 12 pack animals.
- No development should be allowed in the backcountry zone.

Other commenters requested that management be consistent with what is found in the Glen Canyon National Recreation Area.

**Concern: What strategies will the BLM use to support recreation under the range of alternatives?**

##### *Comment Summary*

Commenters suggested that the BLM manage recreational areas with infrastructure that promotes the preservation of GSENM objects and values. Specific examples were the following:

- Create signs and placards to identify culturally significant plants in developed recreational areas.
- Create signage and interpretive panels at roadways and Public-Use cultural sites for user education.

- Maintain visitor use areas and boundaries at existing Public-Use cultural sites to prevent social-trailing and damage to cultural resources.
- Prohibit ropes and other climbing aids for access to cultural sites (including archaeological resources), except for emergencies or administrative needs, or at the request of tribal members.

***Concern: What strategies will the BLM use to reconcile motorized and non-motorized recreation under the range of alternatives?***

*Comment Summary*

Commenters asked the BLM not to close GSENM to motorized recreation and recommended that the BLM manage and promote motorized recreation to ensure that individuals of all abilities, ages, and backgrounds have access to GSENM. Commenters claimed that the rationale for this is that motorized recreation is the greatest use of GSENM. Accordingly, the agency should adequately consider the full recreation opportunity spectrum for motorized recreationists including e-bikes, e-motorcycles, singletrack motorcycles, ATVs, SxS, 4x4, and automobiles. Commenters also recommended that the agency adequately consider that all potential negative issues associated with non-motorized and motorized recreationists can be mitigated by education and that education of all visitors should be used as an alternative to closure. Still, other commenters requested expanded motorized routes for recreation purposes, particularly near existing roadways and near gateway communities.

On the other hand, other commenters requested that all motorized and mechanized travel within GSENM should be limited to designated routes.

***Concern: What strategies will the BLM use to manage camping?***

*Comment Summary*

Commenters supported continuing dispersed recreation on GSENM and recommended that the BLM adopt dispersed camping standards within the RMP to accommodate this form of camping and to require public input for any dispersed camping closures. Commenters specified that the BLM must require the use of portable toilet systems and fire pans at designated dispersed campsites. Other commenters went so far as to discourage the development of campgrounds on GSENM.

On other hand, other commenters recommended that the agency adequately consider the need for RV-friendly campgrounds, rehabilitated campgrounds, new campgrounds, and existing and new dispersed camping opportunities in the RMP/EIS area to meet the needs of the public.

Finally, commenters had other specific requests related to camping, like the following:

- No camping within 200 feet of springs and water improvements to allow space for wildlife and livestock to access water.
- Camping will not be allowed within areas of identified cultural resources (including archaeological resources).
- Campfires will be allowed only in designated fire grates, designated fire pits, or mandatory fire pans in passage zones. In the outback and primitive zones, fire pans are strongly encouraged.
- Campfires will also be prohibited in archaeological sites, rock shelters, or alcoves Monument-wide. Exceptions may be made for Native American traditional and ceremonial purposes.

***Concern: What strategies will the BLM use to manage aviation-related tourism?******Comment Summary***

Some commenters requested the BLM preserve airstrips on the GSENM for recreational use. Other commenters requested the opposite – that the BLM close GSENM to aviation.

***Concern: What strategies will the BLM use to manage non-motorized trails under the range of alternatives?******Comment Summary***

Commenters suggested that the BLM's management plan include selective trail hardening in high visitation areas. Most notably Lower Calf Creek Falls and Devils Garden, and the Hoodoos Trail. Other commenters requested the development of single-track mountain bike trails. Relatedly, commenters supported the proposed Hiking-biking trail on an 8-mile gap road.

***Concern: What strategies will the BLM use to manage special recreation permits (SRPs) and special events on GSENM?******Comment Summary***

Some commenters overall demanded that no reservation systems or SRP systems be used. Other commenters requested continued use of SRPs and further restriction on the issuance of these SRPs to avoid overuse of recreation sites.

Relatedly, commenters requested that GSENM be closed to special events. Other commenters likewise noted that the BLM should not restrict any form of special event on GSENM. Some other commenters suggested that special events may be approved, under permit, if the event meets other zone requirements and RMP provisions.

Finally, commenters recommended that all forms of approved outdoor recreation be permitted by guides and outfitters on GSENM.

***Climate Change******Concern: What strategies will the BLM use to address climate change in the range of alternatives in the GSENM RMP?******Comment Summary***

One commenter gave several suggestions for how the BLM should incorporate climate change concerns into the RMP development. The commenter offered several recommendations to consider in including climate change as a component of the proposed alternatives. Some examples include:

- Manage resources to ensure the landscape's resistance and resilience to disturbances due to climate and drought.
- Develop a climate adaptation plan for GSENM.
- Determine the effects of management actions and land uses on the landscape's resistance and resilience to climate change.
- Document baseline conditions to compare impacts on objects due to climate change or drought.
- Determine wildlife migration patterns and work with adjacent landowners to provide proper corridors for movement.

- Avoid implementation of actions that disturb soils and vegetation during droughts.
- Analyze the effects of land management actions, such as vegetation treatments, on carbon sequestration.

### **Grazing**

#### **Concern: How will the BLM consider grazing within Glen Canyon NRA?**

##### *Comment Summary*

Commenters asserted that the RMP should incorporate appropriate guidelines for ensuring non-impairment and protection of Glen Canyon NRA's values and purpose. Grazing management in Glen Canyon NRA should be approved by the NPS and be consistent with the NPS's recommendations. Some commenters also asserted that the area should be closed to grazing.

#### **Concern: How will the BLM consider the closure of parts or all of GSENM to grazing?**

##### *Comment Summary*

Commenters requested that the BLM no longer issue new permits anywhere in GSENM and either eventually or immediately close GSENM to grazing. Other commenters recommended that certain allotments be closed to grazing for various reasons. The following are examples:

- Areas allocated as unavailable for grazing or unallotted before the 2020 RMP, such as Antone Flat, Upper Paria, South Pasture, Varney Griffin, Boulder Creek Allotment, Dry Hollow Pasture, and other smaller areas
- Areas that include canyon bottom plant communities
- Areas with undisturbed, well-developed biocrust (characterized by dark cyanobacteria and moss or lichen), such as Carmel Top Mesa, Brigham Tea Bench, and Durffey Mesa Pasture
- Areas with relict plant communities, such as Little No Mans Mesa, Spring Point, and Smoky Mesa
- Currently ungrazed and restored areas
- Areas that contain cultural and archaeological sites and paleontological resources
- Voluntarily relinquished allotments
- As many canyons and stream/riparian systems as possible and rare and fragile riparian "oases in an otherwise arid environment," while potentially allowing for water gap access
- Designated critical habitat for the southwestern willow flycatcher

#### **Concern: How will the BLM consider future management of grazing?**

##### *Comment Summary*

Commenters also requested that, per the language found in Proclamation 10286, the BLM should consider retiring and closing certain allotments from grazing, either when permits are relinquished voluntarily or when an assessment demonstrates that such areas are not suitable for grazing. Commenters added that the RMP should include a process outlining the voluntary buyout and retirement of allotments. Commenters requested that the BLM apply management actions to grazing to ensure the protection of GSENM's objects. The following are examples:

- For renewal of grazing permits, renewal should not continue without an in-depth analysis to determine whether the authorized grazing is compatible and consistent with the proper care

and management of GSENM objects. This consistency analysis should be made available for public comment.

- The BLM should complete an investigation of potential ways to provide reasonable and fair financial inducements to grazers who voluntarily agree to permanently reduce the active animal unit months.
- The BLM should ensure that the monitoring and analysis of allotments are scientifically valid.
- Over the next 20 years, all grazing permits should gradually be renewed following a NEPA analysis. The BLM should conduct a rangeland health analysis, using an interdisciplinary team, on each allotment and provide public input in the permit renewal process.
- The BLM should retain the previously identified forage reserve allotments.
- The BLM should develop a drought management plan with specific, defined decision thresholds prescribing management actions for grazing in GSENM during droughts, and consider reducing the amount of land designated for grazing and livestock in response to continuing drought conditions.
- The BLM should base grazing management on objective, justifiable, scientific principles and protect culturally significant resources to tribes, including archaeological resources, springs, and culturally significant plants.
- The BLM should offer tribes the opportunity to meaningfully engage in discussions about range management, if they desire.
- The BLM should conduct studies comparing resource conditions before and after installation of range infrastructure and remove dysfunctional infrastructure, when needed.
- The BLM should establish a system of ungrazed reference areas across GSENM, including unavailable areas and exclosures.
- The BLM should limit grazing to 30 percent utilization.
- The BLM should utilize annual operating instructions for grazing management on each allotment. Such annual instructions should summarize the results of recent monitoring, describe evidence of changes relative to rangeland health standards, describe past grazing use, list problems and challenges, and describe grazing practices proposed for the next season. These should be made public using the internet.
- The BLM should monitor potential impacts of grazing on GSENM's cultural, historic, natural, and scientific objects.

***Concern: How will the BLM acknowledge the historical, ecological, and socioeconomic role of grazing in GSENM?***

*Comment Summary*

Commenters requested that the BLM recognize that livestock grazing has existed on this landscape for more than a century; as such, it is part of the landscape and should be protected by this GSENM RMP. Commenters recommended several management actions that should be included in the RMP to ensure this recognition. The following are examples:

- Maintain and potentially expand grazing rights in GSENM.



- Recognize that some grazing allotments may qualify as traditional cultural properties that are eligible for National Register of Historic Places consideration (that is, historic properties) under some circumstances.
- Close allotments only when other affected interests, including the county government's interests, are involved.
- Continue active management of range projects that improve water distribution, vegetation cover and diversity, and soil health, as necessary, for the land within GSENM's boundaries.

**Concern: How will the BLM protect bighorn sheep from grazing actions?**

*Comment Summary*

Commenters recommended that no allotments be converted from cattle and horses to domestic sheep or goats within at least a 9-mile buffer of bighorn sheep habitat, except where topographic features or other barriers prevent physical contact. This is to prevent the spread of disease from domestic sheep and goats to desert bighorn sheep. This is consistent with BLM Manual 1730 Rel. No. 1-1771.

**Special Status Species and Habitats**

**Concern: How will the BLM implement management for special status species and habitats?**

*Comment Summary*

Multiple commenters expressed the need for increased maintenance, protection, enhancement, and restoration of special status species and habitats. Many of the commenters recommended that the BLM implement management strategies from livestock grazing management actions to minimize disturbance and activity impacts on sensitive species and habitats. Commenters also requested that the BLM coordinate with cooperating agencies, volunteers, universities, and tribal nations to inventory fish and wildlife populations and to evaluate the protection needs.

Commenters argued for the conservation of terrestrial and aquatic ecosystems; the protection of Mexican spotted owl, pinyon jay, eagle, and raptor populations and their corresponding habitats; the preservation of wildlife corridors; and the restriction of ground-disturbing actions and vegetation restoration methods. One commenter emphasized the need for public education to improve the understanding of fish and wildlife species, while another commenter emphasized the need for more information on the effects of climate change and livestock grazing on rare plant species. Finally, one commenter recommended reduced livestock grazing on the Wiggle Rim Pasture of the Cottonwood Allotment where rare plants have been observed.

**Water**

**Concern: What management actions and protection measures will the BLM use to protect water quality and resources in the range of alternatives?**

*Comment Summary*

Commenters recommended that the BLM develop water treatment plans and management actions in collaboration with tribes. The commenters also suggested a range of management and restoration alternatives, such as fencing and preventing or limiting surface-disturbing activities, such as grazing, camping, other recreation, motorized activity, and vegetation treatments, near water resources. Commenters emphasized including management actions that improve wetland resilience against climate change and drought.

***Specially Designated Areas******Concern: How will the BLM incorporate specially designated areas into the GSENM RMP alternatives?******Comment Summary***

Commenters requested that the BLM use area of critical environmental concern (ACEC), research natural area (RNA), outstanding natural area (ONA), and WSA special designations to protect GSENM resources. Other commenters emphasized the need to prioritize existing areas with special designations that must be protected from damage. Recommendations regarding alternative components for specially designated areas include:

- Do not manage multiple-use lands like wilderness or WSAs.
- Recognize that existing special designations are sufficient.
- Designate new ACECs to protect ecosystems in areas, including Sherman's Wash-Petrified Hollow, White Cliffs, Warm Creek, and Willis Creek.
- Designate new RNAs at Little No Mans Mesa, Big Browns Bench, Spring Point, and Smoky Mesa.
- Continue to designate new WSAs.
- Protect and foster the recovery of places already designated as ONAs, which are Devils Garden ONA, Escalante Canyons ONA, North Escalante Canyon ONA, the Gulch ONA, and Phipps-Death Hollow ONA.
- Build fences and exclude livestock from sensitive areas such as Devils Garden, Wolverine Petrified Wood Natural Environmental Area, and the Gulch ONA.
- Update the inventory and manage the 54,400 acres of former SITLA to WSAs for the preservation of their wilderness character.
- Limit group sizes in wilderness areas as well as in non-wilderness areas.
- Consult with tribes about the identification and management of areas with special land designations.
- Continually update the lands with wilderness characteristics inventory across GSENM.
- Protect lands with wilderness characteristics areas from damage and disturbance that may diminish those characteristics.
- Do not establish newly mechanized or motorized routes in lands with wilderness characteristics areas.

***Vegetation******Concern: How will the BLM prioritize native vegetation communities and control the spread of noxious weeds and invasive plants in the range of alternatives?******Comment Summary***

Commenters recommended the BLM develop vegetation treatment plans and management actions in collaboration with tribes and specific groups like the Escalante River Watershed Partnership and the GSEP. Commenters also suggested a range of management and restoration actions that includes both active and passive treatments, guidelines specific to grazing (such as grazing allowed after 80 percent recovery level), suggestions on noxious and invasive woody plant removal (including no mechanical removal), and recommendations regarding allowances for seed removal, native seed attainment, and

storage for restoration, research, and conservation strategies for rare plants. Commenters also advocated for the prohibition of mechanical vegetation and timber treatments in GSENM under the range of alternatives.

### ***Fire and Fuels***

#### ***Concern: How will fire and fuels management address deviations from historic fire regimes and return intervals?***

##### *Comment Summary*

Commenters expressed concern regarding adverse impacts from wildfires on resources in GSENM and the surrounding landscape. They requested that the BLM implement management actions, such as native plant reseedling, prescribed burns, and mechanical treatments, to return the fire frequency to historical levels.

### ***Forestry and Woodland Products***

#### ***Concern: How will the BLM mitigate all the conflicts involved in timber harvesting?***

##### *Comment Summary*

A commenter noted all the components of timber harvesting that should be included in the RMP. The commenter discussed both use and nonuse scenarios, as well as allowable exceptions. Management recommendations and requests regarding forestry and woodland products within GSENM included, but were not limited to:

- No areas are currently designated as open to woodland harvesting over the life of the management plan; cutting areas should be designated.
- The plan should exclude floodplains and aquatic and riparian areas from woodland product harvesting, except for Native American ceremonial purposes.
- The plan should reflect that opening GSENM to timber harvesting would boost job opportunities in the area.
- The BLM should allow noncommercial firewood harvesting and Christmas tree cutting with a permit in GSENM
- The plan should restrict cutting ponderosa pine for Christmas tree cutting permits.
- Alternatives should prohibit the harvesting of any old-growth trees, and all old-growth trees within the designated cutting areas will be marked.
- Within cutting areas, there should be surveys for any nesting bird species before the area is permitted for cutting. If permits run more than a year, yearly surveys should be conducted.
- The BLM should disallow any motorized travel within designated cutting areas.
- No designated cutting areas should be established within GSENM.
- No mechanical forms of timber harvesting should be allowed; only chain saw and handsaw cutting should be allowed.
- Cottonwood and willow harvesting should be allowed by members of the tribal communities for ceremonial use by permit.

**Visual Resources****Concern: How will the BLM manage lands in GSENM to protect visual resources?***Comment Summary*

Commenters recommended the following actions and alternatives to protect visual resources: manage lands in GSENM as visual resource management (VRM) Class I or II areas (never as VRM III or IV), manage former SITLA inholdings as the VRM class of surrounding lands, manage all areas with high resource values and special designations as VRM Class I, and include a lightscape management plan based on best management practices. Commenters also recommended specific actions, such as limiting artificial lighting, minimizing infrastructure, and designing facilities to blend in with the landscape. These commenters emphasized that the BLM should make management decisions in coordination with tribes and consistent with tribal values.

**Cultural and Tribal Concerns****Concern: How does the BLM plan to include tribal knowledge and concerns in the development of the GSENM RMP?***Comment Summary*

Commenters focused on multiple aspects of cultural and tribal concerns, but emphasized that local tribes should be consulted, collaborated with, and included in decision-making related to the RMP's development. Some topics of interest included protecting resources important to traditional uses and values, minimizing damage to cultural resources from visitation, ensuring tribal access for traditional uses, addressing gaps in knowledge, and improving education resources for visitors.

Recommendations regarding alternative components for cultural and tribal resources included:

- Manage and protect cultural resources in collaboration with tribes.
- Manage and protect natural resources important to traditional uses, in collaboration with tribes.
- Define “cultural resources” according to tribal perspectives and direction.
- Engage tribes about archaeological object collection for academic use.
- In collaboration with tribes, establish and implement protective measures, including fire prevention, where necessary, for sites, structures, objects, and traditional use areas important to the tribes for historical and cultural reasons.
- Prohibit domestic pets and pack animals in archaeological sites, in collaboration with tribes.
- Close cultural sites to visitation when they are determined to be at risk of damage, or they are in use by tribal members for traditional purposes, to the extent permitted by law.
- Prohibit mechanical treatment of vegetation that may be harmful to cultural resources.
- Minimize damage to cultural resources from visitor use.
- Ensure tribal access for traditional purposes.
- In collaboration with tribes, develop a schedule to allow sites to “rest.” Resting periods usually occur in the winter months, and visitation should be restricted during these times.
- Keep sensitive cultural information confidential and safeguard it from release, to the extent allowed by law.

- Rename Jacob Hamblin arch and any other monument names that are associated with folks involved in the Mountain Meadow Massacre as well as other violent settler actions.
- Conduct Class III cultural resource inventories in a manner that complies with Section 110 of the NHPA and Section 14 of the Archaeological Resources Protection Act.
- Conduct all research, inventories, and monitoring of archaeological resources following applicable laws, regulations, and policy. Also, employ tribal members and incorporate tribal policies and protocols to the extent legally permissible.
- Educate recreational users as directed by the tribes on how to visit respectfully, as well as on methods to avoid and reduce impacts on sensitive cultural resources.

### **Soils**

#### **Concern: How will biological soil crust management reduce the impacts on biological soils crusts and soils??**

##### *Comment Summary*

Several commenters requested increased protection for soil crust species in GSENM. Commenters expressed concerns about the impact management activities, such as recreation, OHVs, road and trail construction, vegetation treatments, and grazing, will have on soil resources in GSENM. Commenters emphasized the importance of increasing and improving biological soil crust management and protecting soils from surface-disturbing activities to ensure that soil health is maintained.

Commenters supported the use of the best available research and continued research on biological soil crusts as well as the identification of biological soil crust conditions, including impaired areas, throughout GSENM. Research efforts should focus on preserving and restoring biological soil crusts, the relationship between management activities and changes to the soil structure and function, and the distribution of soil crusts.

### **3.6.12 Range of Alternatives**

#### **Concern: How will the BLM ensure that allowed actions within GSENM will be in line with GSENM's protection plans?**

##### *Comment Summary*

Multiple commenters expressed concerns that allowed actions will not be compatible with GSENM's goals. Commenters requested that the BLM carry out compatibility surveys and studies before any uses are allowed.

#### **Concern: Will the BLM revise the alternatives to properly meet the purpose and need statement?**

##### *Comment Summary*

Multiple commenters stated that Alternatives B and C do not properly fulfill the objectives of the purpose and need statements. One commenter suggested that none of the alternatives adequately fulfills the RMP/EIS's purpose and need. Management recommendations and requests regarding the range of alternatives within GSENM included, but were not limited to:

- Keep the lands within GSENM open to all types of uses.
- Take the scale of the RMP/EIS into account when making decisions, as it is a large-scale proposal. Set the goals appropriately and realistically.

- Develop a specific multiple-use plan that adequately addresses the needs of the public rather than a general multiple-use plan solely benefiting organizations.
- Adequately consider visitor usage rates when designating uses.
- Include opening more land to motorized recreation opportunities.
- Ensure the range of alternatives follows Proclamation 10286 regarding uses in GSENM.
- Rewrite Alternatives B and C so that they adequately reflect the purpose and need that GSENM protection should be ahead of other activities, such as recreation.
- Expand multiple uses in GSENM to include all types of activities, including but not limited to, livestock grazing, hunting, fishing, mining, mineral exploration and extraction, recreation, and wildlife habitat management.
- Encourage collaboration between conflicting or opposing parties to potentially reduce conflicts over changes within GSENM.
- Honor existing permits and leases within GSENM as the new RMP is implemented.

### **3.6.13 Best Available Science and Data**

***Concern: How will the BLM incorporate the best available information and baseline data in the proposed action, range of alternatives, and resources to analyze and mitigate impacts?***

#### *Comment Summary*

Commenters emphasized the need for consistent, baseline best scientific data when comparing impacts across alternatives. Commenters suggested that the BLM should incorporate the best available current science and information, including but not limited to, the following specific topics:

- Air quality
  - Commenters cited various scientific literature linking the impacts of poor air quality on human health. Commenters noted that people who live near oil and gas wells could face higher rates of medical conditions compared with populations outside areas with oil and gas development. Commenters emphasized the negative health impacts associated with oil and gas emissions, particularly from fracking.
- Climate change
  - Commenters submitted literature assessing the influence of the BLM-authorized activities, and thus how climate change is impacting resources within GSENM.
- Recreation
  - Commenters requested that the BLM use the most recent available data on recreation, including data from pre-pandemic years and data during the pandemic.
- Livestock grazing
  - Commenters requested that the BLM use current data on forage availability; rangeland and ecosystem health; vegetation, including projected impacts from climate change; and range capacity to determine the grazing capacity that would meet rangeland health standards.
- Vegetation
  - Commenters cited documents and scientific literature on the positive impacts of seeding native plants species in preventing the expansion of nonnative plant species.

- Commenters were concerned about the impacts of pinyon-juniper removal on bird species, particularly on pinyon jays; the commenters referenced recent research and recommended the BLM conduct a full survey of GSENM birds' nesting habitats.
- Wildlife and habitat connectivity
  - Commenters suggested using resources that represent the biological diversity of GSENM, namely the Conservation of Science Partners report.
- Socioeconomic and environmental justice
  - Commenters' suggestions included the use of recent economic data (within 2 years), applying a multi-scale approach and local factors, reevaluating the IMPLAN modeling, updating gateway community property values, and using economists and annual reports to evaluate conditions.

Various commenters provided studies and other data for the BLM to consider, including references to books and articles for GSENM. They requested that a restoration methodology be based on data from site-specific conditions. Additional comments recommended that the baseline should be established from the original designation of GSENM in 1996.

### **3.7 ISSUES AND ANALYTICAL FRAMEWORK**

#### **3.7.1 Air Quality**

***Issue: How will the BLM mitigate any potential air quality impacts on GSENM and the surrounding landscape, particularly in the nearby Class I and sensitive Class II areas from BLM-authorized activities?***

##### *Comment Summary*

Commenters expressed concern about how management decisions could degrade the overall air quality and affect public health and sensitive ecosystems in GSENM and surrounding Class I and sensitive Class II areas. Commenters emphasized the need to have comprehensive baseline data and encouraged the BLM to consider the best available science, recent air quality data, and literature documenting the impacts on the viewshed and sensitive resources. Commenters recommended that the BLM implement mitigation measures and identify the mechanisms it will use to ensure any potential impacts on air resources are minimized. Commenters expressed concern over fugitive dust emissions generated from motorized recreation and urged the BLM to consider motorized recreation's impacts.

#### **3.7.2 Climate Change**

***Issue: How will the BLM address the threats of climate change on natural resources in GSENM?***

##### *Comment Summary*

Many commenters were concerned about the impacts of climate change on the GSENM landscape and provided specific strategies, recommendations, management actions, and topics of interest for further analysis. In the process of producing the RMP, commenters urged the BLM to properly analyze how climate change will impact existing and future habitats, monument objects, livestock grazing areas, and recreation opportunities and activities. Commenters also noted how climate change may impact a wide range of issues present in GSENM, such as water quantity and wildfires.

***Issue: How will the BLM use the best available climate science to provide clarity on recreation and livestock grazing impacts?******Comment Summary***

Multiple commenters expressed a desire for the BLM to use high-quality information to quantify climate change impacts on GSENM, along with activities that contribute to climate change. Specifically, commenters mentioned livestock grazing and OHV recreation as two uses that may have a complicated relationship with greenhouse gas emissions, habitat health, and ecosystem resiliency. For instance, though some commenters focused on the negative impacts of grazing on climate change, others argued that livestock could have a beneficial use, if managed correctly, by sequestering carbon and removing invasive weeds.

**3.7.3 Cultural Resources*****Issue: How will the BLM protect cultural resources and historic sites?******Comment Summary***

A commenter noted that pack animals should not be allowed in relict plant communities and archaeological sites; the commenter requested that the plan incorporate explicit language about cultural resource monitoring. A commenter also expressed concern that many sites that have historical and scientific interests are on lands sacred to tribal nations.

***Issue: What strategies does the BLM plan to implement to protect cultural resources and to mitigate impacts from vandalism, recreation, OHVs, and grazing?******Comment Summary***

Commenters expressed concern regarding the impacts of visitation, livestock grazing, and unauthorized OHV use in historic and culturally significant areas. Many commenters mentioned vandalism to petroglyphs, and human trash and waste left at these locations. Commenters expressed the need for more protection of these sites and the reduction of livestock grazing. Some commenters suggested the need for more collaboration with tribal nations for the protection and preservation of culturally important resources.

***Issue: How will the BLM effectively inventory the historically significant and culturally important resources in GSENM?******Comment Summary***

Commenters expressed concern regarding the lack of information on culturally significant resources and locations in GSENM. One commenter suggested the BLM complete ethnographies, which could provide critical information about how to best manage cultural resources and sacred sites within GSENM. One commenter expressed concern about scientific research, surveys, reports, and historical documents, and suggested the need for staff to monitor this invaluable collection of data. Other commenters suggested the BLM should adopt and implement methods that will accurately quantify the extent of historically focused visitation in areas of traditional interest.



### **3.7.4 Tribal Concerns and Use**

***Issue: How will the BLM ensure the protection of culturally sacred sites and resources? What practices does the BLM have in place to gather and respond to tribal concerns in GSENM?***

*Comment Summary*

Commenters expressed concern regarding access for tribal members to culturally important sites. Other commenters expressed concerns regarding special permissions for tribes to access important sites and suggested that these areas be closed to the public. Many commenters suggested the BLM engage with the tribes regarding traditional knowledge about vegetation communities, vegetation restoration techniques, and land management. A commenter suggested that the BLM should summarize the results of tribal consultation and identify the main concerns expressed by tribes, and how those concerns will be addressed in the draft EIS. That commenter also recommended identifying any protection, mitigation, and enhancement measures identified by tribes.

### **3.7.5 Forestry and Woodlands**

***Concern: Is private cutting limited to the areas that were hand thinned as part of the BLM-approved RMP/EIS?***

*Comment Summary*

One commenter suggested applying an approach to areas thinned in the Buckskin Mountain area that would prohibit tree cutting.

***Concern: How will non-commercial cutting be managed in areas that have previously been hand thinned?***

*Comment Summary*

Multiple commenters were concerned that tree cutting in GSENM will have a negative ecological impact on old-growth trees and other landscape components. One commenter requested that Rock Springs Bench and Buckskin Mountain fuel should not be opened to woodland product harvest and suggested that hand-cutting areas should be designated as part of vegetation restoration projects. One commenter also suggested that cutting should be limited to post-settlement trees and urged the BLM to complete species-specific surveys annually. Another stated that commercial timber harvest should be discouraged; if it is necessary for fire prevention, monitoring and mitigative efforts should be implemented to reduce harmful effects on species and habitats.

***Concern: How will forest management practices within the RMP address the threat of forest fires?***

*Comment Summary*

Commenters recommended better forest management by reinstating thinning, timber harvest, and sawmills to reduce forest fires.

### **3.7.6 Fire and Fuels**

***Issue: How will the BLM mitigate impacts from vegetation treatments, such as prescribed burns and mechanical treatments, and restore damages from wildfires?***

*Comment Summary*

Commenters requested that the BLM consider all potential adverse and beneficial impacts of vegetation treatment activities, including prescribed burns and mechanical vegetation removal. They also requested that the BLM reinstate timber harvest and sawmills.

### **3.7.7 Fish and Wildlife**

***Issue: How will the BLM promote wildlife corridors??***

*Comment Summary*

Multiple commenters stated the importance of maintaining wildlife corridors for the success of various species. Multiple commenters recognized that wildlife corridors are often directly linked to critical habitats. They urged the BLM to take steps to protect these areas and emphasized that alternatives should protect critical movement routes.

***Concern: Does the BLM plan to investigate predator-prey relationships within GSENM?***

*Comment Summary*

Multiple commenters expressed concern over the current predator-prey relationships in the area; they noted the interaction changes as introduced species outcompete natural species. Commenters requested the BLM begin to monitor interactions more closely with these introduced species and intervene when an introduced species overruns a natural species. A commenter requested that the BLM not halt all transplants of species to fully support existing wildlife populations. One commenter asked the BLM to reference other wildlife plans in Utah to see other management plans.

***Issue: How will the BLM mitigate the impacts of climate change, cattle grazing, invasive species, noise, and human-caused disturbances on fish and wildlife species and habitats?***

*Comment Summary*

Commenters would like the BLM to consider the impacts of climate change on fish and wildlife species when making management decisions.

Commenters raised concerns about the impacts of livestock grazing on fish and wildlife, in particular the resources that fish and wildlife rely on for survival. Commenters listed livestock grazing as negatively impacting water quality for aquatic ecosystems, suitable habitat for ground-nesting birds, and cover and forage for other terrestrial wildlife species. One commentator noted that grazing may lead to a surge of invasive plant species in some areas. Commenters recommended that the BLM analyze the impacts of livestock grazing specifically on terrestrial and aquatic ecosystems and develop an ecological study to document and review potential impacts. A commenter suggested that grazing and human-caused disturbances negatively impact big game species, such as big horn sheep, pronghorn, and mule deer, as well as smaller mammals like kangaroo mice, prairie dogs, and rabbits.

Commenters asked the BLM to identify which land uses are causing impacts on wildlife.

***Issue: How will the BLM evaluate road density criteria and their impacts on wildlife?******Comment Summary***

A commenter expressed concern regarding biased data on the impacts on wildlife habitat from road density criteria; the commenter stated that the BLM should use the best available information on the issue.

***Issue: How will the BLM evaluate the impacts of recreation (motorized and nonmotorized) on fish and wildlife species?******Comment Summary***

Commenters expressed concerns about the level of impacts on fish and wildlife habitats from both motorized and nonmotorized recreation. A commenter asked that the BLM compare naturally occurring phenomena that disturb habitat with the disturbance from recreation in the decision-making process. The BLM should use the best available information regarding impacts and disturbance from motorized and nonmotorized recreation when considering fish and wildlife conservation management strategies.

***Issue: How will the BLM mitigate impacts on riparian habitats for terrestrial and aquatic species?******Comment Summary***

Commenters expressed concern regarding the impacts on riparian habitats for terrestrial and aquatic species, such as the flannelmouth sucker, bluehead sucker, Colorado cutthroat trout, chuckwalla, and various species of toads and salamanders. A commenter expressed the need for stream protections that support native fish populations and noted that impacts from grazing and climate change are principal threats to the water regime. Another commenter expressed concerns of spreading invasive plant species in riparian habitats.

***Issue: How will the BLM manage resources to provide for wildlife habitat connectivity?******Comment Summary***

Commenters expressed the importance of wildlife corridors for wildlife species' connectivity, stability, recovery, and resilience. They requested that the BLM identify wildlife migration and potential habitat corridors, including avian and big game migration corridors. Further, commenters requested that the range of alternatives identify and analyze different areas for potential habitat corridors.

***Issue: How will the BLM estimate wildlife species' abundance and its relationship to both habitat and effects of management actions?******Comment Summary***

Commenters expressed concern about the population abundance estimates for wildlife species. They suggested the BLM investigate the carrying capacity for wildlife populations when implementing management practices.

***Issue: Will there be a management plan for predator and nuisance animal control?******Comment Summary***

Commenters expressed concern about predator and nuisance animal control and the effects on nontarget species.

### **3.7.8 Special Status Fish and Wildlife Species**

***Issue: How will the BLM mitigate grazing impacts in areas where special status species have been documented?***

*Comment Summary*

Commentators expressed concerns regarding the protection of habitats that are occupied by federally listed endangered and threatened species and species of special status from cattle grazing. Several comments were aimed at the protection of the Mexican spotted owl, greater sage-grouse, southwestern willow flycatcher, yellow-billed cuckoo, and pinyon jay. One commenter expressed concern about how the BLM plans to mitigate grazing in areas where there is an overlap between Mexican spotted owl occupied or potential habitat and grazing allotments. Another commenter noted that grazing degrades the habitat for ground-nesting birds and urged the BLM to consider the designation of critical habitat as unavailable for grazing. Other commenters focused on the impacts of grazing on federally listed and special status species' diet, shelter, migratory patterns, and habitat use throughout stages in the species' life cycle.

***Issue: What strategies is the BLM using to protect important habitats for endangered and threatened species in GSENM?***

*Comment Summary*

Some commenters noted the BLM is required to comply with specific statutory and regulatory obligations regarding federally listed species. Other commenters focused on protecting habitats for special status and federally listed species and closing areas to all uses where those species are found. The commenters also discussed rerouting existing trails to avoid those areas, and they suggested no construction of new trails within the areas where those species can be found. Other comments related to protecting important areas such as leks for sage-grouse or important migration corridors for pronghorn. Those commenters also suggested collaborative efforts with the State to identify those important areas and for tracking and monitoring efforts to further understand the population dynamics of those species. Another concern was the invasion of aquatic invasive species and the impacts they have on native fish populations.

On the other hand, commenters were unsupportive of protecting areas where special status species may be found without photographic evidence or other proof of existence in GSENM. A commenter suggested that prairie dogs be either quarantined or removed from the areas to a minimum of 15 miles from the nearest community

### **3.7.9 Groundwater**

***Issue: How does the BLM plan to mitigate concerns about the excessive pumping of groundwater stores to aid in livestock grazing? Will the BLM monitor groundwater-dependent ecosystems, including aquifers that contribute to public water systems? Does the BLM intend to include contingency plans for periods of drought when water levels are lower than average?***

*Comment Summary*

Commenters had concerns that the rate of water being pumped out to support livestock grazing will exceed the groundwater stores and reduce water flow from springs and riparian areas. Multiple commenters requested that the BLM complete a comprehensive study of the impacts of groundwater pumping and an inventory of current groundwater conditions in the area. A commenter requested a comprehensive study of aquifers in the area for a baseline study for groundwater usage, including public

water systems complying with the Underground Sources of Drinking Water under the Federal Safe Drinking Water Act.

### **3.7.10 Wetlands and Riparian Areas**

***Issue: What management strategies will the BLM implement to restore wetlands and riparian areas in GSENM?***

#### *Comment Summary*

Commenters expressed concern over the water quality and condition of the wetlands and riparian areas in GSENM. They suggested the BLM include additional protection measures, restoration, and cattle exclusion in the management strategies.

***Issue: What data, figures, and methodologies will the BLM use to quantify potential impacts on water resources?***

#### *Comment Summary*

Commenters emphasized the need to incorporate accurate and relevant water quality, water resources, and aquatic habitat data, as well as the most current climate change data, to better assess the impacts of BLM-authorized activities in the range of alternatives. Commenters offered several recommendations, such as detailed maps, updated inventories and monitoring data, and seasonal and annual changes to water flows.

### **3.7.11 Lands and Realty**

***Issue: How will the BLM address existing ROWs within GSENM in the RMP?***

#### *Comment Summary*

Commenters were divided on how the BLM should manage ROWs and inholdings within GSENM. While some commenters urged the BLM to retain public land and acquire inholdings to protect GSENM objects, most commenters asked that the BLM honor existing ROWs, especially regarding congressionally designated utility corridors and RS2477 ROWs that cross GSENM boundaries. Commenters in this latter category wanted management decisions in the new RMP to limit any restrictions to these resources to minimize conflicts. Additionally, another commenter wanted the BLM to consider maintaining historically used vehicle trails and protect them as culturally significant ROWs. On the other hand, one commenter expressed a desire for the BLM to relocate ROW holdings outside GSENM and work with ROW holders to do so while designating GSENM as an exclusion or avoidance area. Regardless, multiple commenters wanted the RMP to identify all legal ROWs granted by the court to state, county, municipal, and private entities within GSENM boundaries for planning and analysis.

***Issue: To what extent will the BLM allow or restrict the permitting of development and economic activity within GSENM?***

#### *Comment Summary*

Commenters were divided on how the BLM should manage GSENM regarding permitting further development or economic activities, such as building transmission towers or expanding grazing. Some commenters requested that the BLM limit all development, including energy uses (solar, wind, etc.) and utility infrastructure, to maintain the integrity of viewsheds. Other commenters desired to expand these uses, including grazing and timber harvest, to boost economic activity.

***Concern: How does the BLM plan to address the privately owned lands that predate GSENM, under this new management plan?****Comment Summary:*

Commenters expressed concern regarding the sale or exchange of private lands within the planning area, as sale of those lands would result in a loss of revenue for the County. The commenter goes on to state that these private lands preexisted GSENM and do not support any planning efforts by the federal government on these lands. The commenter is in support of ROWs to access public lands, if need be, and would support land exchanges where the net benefit is in favor of the County and where access to public lands is not limited by the implementation of the trade.

**3.7.12 Lands with Wilderness Characteristics*****Issue: How will the BLM address lands with wilderness characteristics in GSENM, and how will such lands be managed?****Comment Summary*

Multiple commenters believed the previous lands with wilderness characteristics inventory, done in 2018, was flawed, full of errors, and full of inaccurate data. These commenters urged the BLM to redo the lands with wilderness characteristics inventory in GSENM, following the inventory requirements listed in Manual 6310, as part of this current RMP development process. Multiple commenters also expressed that the BLM should analyze the various benefits of preserving lands with wilderness characteristics areas on air and water quality, night skies, viewsheds, and overall ecosystem health, and identify lands with wilderness characteristics areas that are not currently protected by WSA designation.

Dissenting commenters pointed out that human activity has been present on GSENM lands for over a century; therefore, considering the area as lands with wilderness characteristics is false due to the presence of historic artifacts such as cabins, corrals, fences, roads, and other human-made items that still dot the landscape. These commenters wanted the BLM to recognize this human history instead of promoting lands with wilderness characteristics designations on these lands.

**3.7.13 Landscape Characteristics (Visual Resources)*****Concern: How will the BLM ensure the protection of visual resources?****Comment Summary*

Several commenters focused on the uniqueness, remoteness, and rarity of visual resources in GSENM, as well as their archaeological and historical significance. One commenter named the importance of scenic byways, particularly Burr Trail and Hole-in-the-Rock Road. Another commenter expressed that visual resources are often tied to the protection of other GSENM objects. Commenters urged for the management direction in the EIS to be clear, limit surface disturbance, and ensure that compliance with VRM classes is not discretionary. Commenters asked the BLM to consider VRM Class I to protect these existing landscape characteristics and benefits and to prioritize the protection of visual resources, especially with an increase in recreation.

***Issue: Will the BLM collect and reference the best available data about visual resources?******Comment Summary***

Commenters urged the BLM to collect and reference the best available data for the analysis of visual resources. One commenter expressed that the BLM should consider information such as socioeconomic data or visitor experience surveys. Another commenter asked the BLM to consider the potential degradation of visual resources with units such as communication towers and utilities. Commenters also asked that the BLM include the visual resources defined in Proclamation 10286 in the consideration of potential visual impacts.

***Issue: How will the BLM define and protect specific visual resources?******Comment Summary***

Commenters were concerned that the existing VRM program was not developed to protect specific visual resources. Commenters encouraged the BLM to consider the visual resources defined in Proclamation 10286 in revising VRM program standards.

***Concern: How will the BLM preserve the night skies of GSENM? Will the BLM develop a comprehensive plan to protect night skies?******Comment Summary***

Several commenters expressed that GSENM is unique in its pristine and rare night skies. They would like the BLM to protect this resource. Several commenters expressed the different benefits of night skies, including a general societal good, such as mental health benefits; recreation opportunities for interpretative rangers; astro-tourism opportunities; and aid for migrating birds' ability to navigate at night. Several commenters urged the BLM to develop and implement a comprehensive plan to protect night skies.

***Concern: Will the BLM include tribes in night skies discussions?******Comment Summary***

One commenter expressed the cultural relevance of night skies to some tribes and suggested that tribes be included in night skies discussions.

***Issue: How will the BLM account for the direct, indirect, and cumulative impacts of foreseeable actions on night skies?******Comment Summary***

Commenters requested that the EIS account for direct, indirect, and cumulative impacts of foreseeable actions on night skies. A commenter explained the importance of considering the accumulation of small-scale behaviors in this analysis and discussing and considering the methods of control.

**3.7.14 Terrestrial Habitat, Vegetation Resilience, and Conservation*****Issue: What strategies does the BLM plan to implement for terrestrial habitat, vegetation resilience, and conservation?******Comment Summary***

Commenters expressed concern regarding vegetation treatments after disturbance such as fire, grazing, mechanical treatments, and herbicide treatments. Commenters expressed the need for restoration practices with native seeds to promote habitats for wildlife. One commenter suggested prohibiting

mechanical treatments to remove sagebrush, pinyon, and juniper because these treatments further degrade the habitat and cause stress to the wildlife that relies on those habitats. Another commenter stated that vegetation treatments should only be aimed to benefit native wildlife, not livestock. Commenters were divided on grazing practices on the landscape; some commenters stated that grazing has a negative impact, while one commenter suggested that grazing has beneficial components for vegetation communities and ecosystems.

### **3.7.15 Vegetation**

#### ***Issue: What methods does the BLM plan to implement for restoration?***

##### *Comment Summary*

Many commenters were opposed to the use of chaining and other mechanical treatments for removing vegetation. Many commenters agreed that mechanical treatments disrupt the soil, leading to the degradation of the important biological soil crust, which is important for carbon sequestration, the creation of new soils, preventing the spread of nonnative and invasive plant species, and erosion control. Disruption of the soil also leads to habitat degradation. Other commenters noted that while pinyon-juniper encroachment on sagebrush habitat is a problem, old-growth pinyon-juniper woodlands should not be removed because they are an important habitat type for wildlife.

Many commenters also agreed that the use of native plants and reseeding with native seed for restoration efforts were of high importance to promote biodiversity and healthy ecosystems. Commenters noted that the impacts from grazing and drought conditions endanger the future of these flora communities. Another commenter suggested that the BLM should maintain a robust geospatial database of where any vegetation treatments occur in GSENM, so spatial and temporal analyses can be performed to evaluate cumulative effects. Other commenters proposed that vegetation restoration actions must be initially investigated and analyzed within the resistance-acceptance-direction framework, for practicality and efficacy, and comply with the conservation and protection goals contained in Proclamation 10286. Another commenter proposed that the BLM should establish a formal system of reference areas across GSENM that represent reference communities for as many vegetation types and successional phases as possible. This would provide baseline information on the vegetation communities to inform management decisions on restoration and grazing.

### **3.7.16 Noxious Weeds and Invasive, Nonnative Plants**

#### ***Issue: What management plans and strategies will the BLM implement to mitigate the spread of noxious weeds and invasive plants?***

##### *Comment Summary*

Commenters expressed concern regarding the mechanisms for the treatment of noxious and invasive weeds. Commenters expressed concern regarding the presence of noxious weeds. Commenters seemed to agree that the BLM should do extensive inventories of the noxious and invasive, nonnative species to get a baseline of data to help inform management practices. Commenters also submitted their observations of noxious and invasive plants that they have seen in GSENM. These included Bermudagrass (*Cynodon dactylon*), Canada thistle (*Cirsium arvense*), Scotch thistle (*Onopordum acanthium*), puncturevine or goathead (*Tribulus terrestris*), ravennagrass (*Saccharum ravennae*), Russian olive (*Elaeagnus angustifolia*), Tamarisk or salt cedar (*Tamarix ramosissima*), prickly Russian thistle (*Salsola tragus*), hoary cress or whitetop (*Cardaria draba*), Johnsongrass (*Sorghum halepense*), and Russian knapweed (*Acroptilon*



*repens*). One commenter noted that cheatgrass cover in GSENM was relatively low and should be inventoried before treatment of cheatgrass takes place.

Commenters expressed that treatment of weeds that are in low density may further degrade the land and open the land for a stronger invasion of nonnative species and a more fire-prone area. Other commenters also expressed concern regarding mechanical and chemical treatments and the damage they may cause to the environment; as such, commenters requested these methods be used as a last resort effort in restoration practices. This is because of the risk of further degrading the environment and waterways, should an accidental spill or leak of herbicides happen. One commenter suggested that the use of nonnative nursery crops may help native plants reestablish themselves in a degraded environment.

### **3.7.17 Special Status Plants**

***Issue: How will the BLM mitigate grazing impacts in areas where special status plants have been documented?***

#### *Comment Summary*

Commenters expressed concern regarding the impact of grazing on rare, special status, endangered, and threatened plant species. One commenter suggested that reduced or no livestock grazing on the Wiggle Rim Pasture could greatly benefit the range of rare plants that have been documented in the area. Another commenter suggested special status plants are along Deer Creek, from the Deer Creek Campground south to the narrows of long Deer Creek, from the Deer Creek Campground south to the narrows of Deer Creek Canyon, and along Henrieville Creek near the confluence of Shurtz Bush Creek and Lick Wash.

***Issue: What strategies is the BLM planning to use to protect areas with special status, endangered, and threatened plant species in GSENM? How does the BLM plan to inventory the special status species in GSENM?***

#### *Comment Summary*

Commenters expressed concern regarding the abundance of rare, special status, endangered, and threatened plant species and advocated that protecting these species should be a priority for the BLM. Commenters expressed concern about the impacts on these special status plants from drought conditions, climate change, grazing, and expansion of woodlands. One commenter noted that GSENM biologists need to determine whether populations of rare and special status plants are stable, increasing, or declining. Population viability data, derived from demographic monitoring, may be needed for species at high risk of extirpation. If GSENM biologists are not able to do this monitoring, the BLM could partner with other agencies or academic researchers for these surveys. One commenter was skeptical of the BLM's capabilities to increase monitoring of special status species along with the proposed monitoring of other resources of concern with the current staffing.

### **3.7.18 Paleontology and Geology**

***Issue: How will the BLM ensure paleontological resources are protected from human impacts?***

#### *Comment Summary*

Commenters wanted the BLM to understand that GSENM is rich in paleontological resources. These resources provide a great opportunity for research and education uses but also make GSENM vulnerable to visitors that may vandalize, remove, or destroy fossils. Because of this, multiple commenters expressed that they want the BLM to implement proper protection and enforcement

measures to maintain these valuable resources. One commenter recommended day-use permits at places such as the Toadstools, Devil's Garden, Wahweap Hoodoos, and the Cockscomb. Other commenters suggested signage and educational tools to improve behavior.

### **3.7.19 Rangeland Health**

#### ***Issue: How will the BLM honor the protection of GSENM objects and manage grazing?***

##### *Comment Summary*

Commenters recommended several actions related to ending or reducing grazing in GSENM since such a discretionary use is incompatible with protecting GSENM objects. Commenters asserted that the cumulative effects of grazing were destroying other values in GSENM, such as biological soil crusts and relict plant communities. Commenters asserted that grazing activities should not degrade springs, threaten rare plants, damage cultural resources, or jeopardize riparian areas.

Other commenters noted that when properly conducted, grazing and protection of GSENM objects can be compatible. Some commenters suggested that grazing can contribute to positive impacts on the environment. For these positive impacts, commenters requested the BLM do the following:

- Manage and improve watersheds within GSENM boundaries by maintaining animal unit months that benefit water quality and quantity.
- Implement and analyze a 30 percent utilization limit.
- Conduct a new capability analysis.
- Replace current versions of forage and rangeland health standards and adopt new standards centered on quantifying ecosystem health in which forage production and availability are collateral components of the measures of ecosystem health.
- Rely on a new, scientifically valid land health assessment to analyze grazing in GSENM to understand and assess how grazing affects the environment, objects, and cultural objects.
- Develop a schedule of permit renewals for which an analysis under NEPA will be completed.
- Carefully evaluate, monitor, and annually adjust grazing in range operating plans, relying on the best available range management science.
- Avoid chaining in GSENM.
- Round up any feral cattle in GSENM.

Other commenters requested that the BLM, for purposes of the RMP process, center each alternative on how different grazing management alternatives would impact ecological health and the conservation of GSENM objects, and not on the impacts from continuing grazing at current levels. Decisions need to be specific enough so that tangible trends and outcomes can be accurately measured.

#### ***Issue: How will the BLM ensure that management of grazing infrastructure and improvements in GSENM protect objects?***

##### *Comment Summary*

Some commenters argued that the BLM should establish a planning direction that calls for removing infrastructure on relinquished lands, unless the BLM determines that the infrastructure serves an active grazing operation (like a boundary fence between allotments) or that the infrastructure will protect or

restore GSENM objects, as Proclamation 10286 directs. Others noted that range infrastructure is required to be maintained, with fences installed and functional before the yearly turnout is permitted.

Other commenters requested that the BLM prohibit new range improvements and infrastructure, such as fencing, since they spread and perpetuate impacts on GSENM objects. Commenters argued that the adoption of new standards and procedures relating to the construction of range improvements (wells, ditches, water tanks, etc.) for grazing must center on mitigating impacts on ecosystem health and avoiding actions that simply distribute damaging impacts to un-impacted areas, particularly as stress on the landscape increases during drought conditions. Related to drought, commenters recommended that springs and water courses be restored across GSENM. They also recommended that no new waters should be established for grazing purposes; any existing grazing waters should specifically provide wildlife access.

***Issue: How will the BLM ensure that management of grazing acknowledges the importance to the local economy and history of GSENM and the surrounding communities?***

*Comment Summary*

Commenters noted that grazing is critical to the local economies in Kane and Garfield Counties and is critical to the region's historical, cultural, and heritage traditions. As such, a reduction or elimination of grazing in GSENM would cripple the livestock industry and have severe consequences for the people and economy of the surrounding communities. These commenters suggested that grazing continue, if not increase, in GSENM. Commenters also requested that the RMP process recognize and address the socioeconomic context in which rangeland health and grazing management concerns arise; in other words, they requested the RMP process recognize how grazing lifeways in communities surrounding GSENM can be supported in ways that are consistent with the conservation and science mission at GSENM.

### **3.7.20 Recreation**

***Issue: What are dispersed camping sites' impacts on the resource areas and overall recreation opportunities? How will the BLM manage dispersed camping to consider all uses and users?***

*Comment Summary*

Commenters emphasized that in recent years, there has been a dramatic rise in dispersed camping in GSENM. They argued that dispersed recreation has several negative impacts, such as waste accumulation, erosion, and loss of scenic value. Commenters recommended that the BLM review and mitigate any potential negative impacts from dispersed camping.

***Issue: How will the BLM manage motorized recreation opportunities and access, and address the associated impacts?***

*Comment Summary*

Commenters expressed concern over how motorized and OHV recreation can damage sensitive cultural, vegetation, and riparian resources in GSENM. They urged the BLM to consider these impacts in the analysis and development of alternatives and limit additional motorized areas for recreation use.

Other commenters emphasized that motorized and OHV recreation provide valuable recreation access, opportunities, and experiences in GSENM. They urged the BLM to consider the issues associated with motorized recreation opportunities and the impacts closures would have on motorized recreationists.

***Issue: How will the BLM utilize special recreation management areas and extensive recreation management areas, as well as other management techniques, to support quiet and nonmotorized recreation opportunities and resources?***

*Comment Summary*

To protect GSENM objects, commenters urged the BLM to use special recreation management areas and extensive recreation management areas for high-value or potential conflict areas for recreation in GSENM. Commenters urged the BLM to establish zonal management for recreation areas to better manage the increase in visitation and recreation use. They argued that some of the existing recreation areas have seen degradation, and the BLM should incorporate appropriate management action.

***Issue: How will the BLM manage waste generated from recreation opportunities and experiences?***

*Comment Summary*

Commenters expressed concern with the excessive amounts of human waste generated from recreation uses in GSENM. They argued that the waste generated from recreation negatively impacts the objectives of GSENM and harms public health. Commenters urged the BLM to better manage recreation waste and analyze its impacts on overall recreation opportunities and experiences.

***Issue: How will the BLM evaluate and use permit-based recreation systems, considering preservation of primitive recreation opportunities, guided recreation, as well the diversity of other events that are subject to special recreation permits?***

*Comment Summary*

A commenter recommended that the BLM implement recreation permits to preserve primitive experiences and sensitive historic, prehistoric, and scientific resources. The commenter stressed that special recreation permits should emphasize size limits and protect GSENM resources. Commenters also urged the BLM to prohibit the use of competitive events due to their potential damage to GSENM. They argued that other areas in Utah are sufficient for competitive events.

A commenter expressed concern about a permitting system and how it would impact guides. The commenter argued that competing with the public for permits would be harmful; the commenter emphasized the need to have separate permits. Commenters also argued that the BLM should permit competitive-based recreation events and issue special recreation permits in GSENM. They argued that impacts would be minimal, and GSENM provides a unique venue for recreation events.

***Issue: Will the BLM permit equestrian recreation activities? How will the BLM address the impacts?***

*Comment Summary*

Commenters recommended that the BLM continue to allow dispersed camping with horses due to the limited impact horses have on resources. They urged the BLM to not consider requiring any permits for recreational horse activities. Other commenters noted that the BLM should require horseback riding permits to better educate the public on GSENM and to protect sensitive resources that could be damaged from equestrian activities.

***Issue: How will the BLM improve recreation facilities and trails in the RMP to improve overall recreation opportunities, experiences, and access? Would there be any associated impacts with facility improvements?***

*Comment Summary*

Commenters argued that there is a need for improved recreation facilities to accommodate new recreation opportunities and experiences. They argued that upgrading and expanding existing infrastructure would better mitigate potential short-term and long-term impacts on GSENM. Commenters also urged the BLM to upgrade infrastructure at campgrounds and trailheads to better manage human waste. Some commenters expressed concern that upgrading facilities would have a negative impact because it would continue to support high visitation trends and recreation use. They urged the BLM to limit potential improvements due to their impact on GSENM.

Commenters urged the BLM to expand and consider creating and improving recreation trails. They argued that adding new trails is consistent with GSENM objectives and would improve overall recreation access and opportunities. Commenters provided various recommendations for trail improvements, which can be found in *Components of Alternative: Recreation*.

Commenters urged the BLM to continue to allow access to the slot canyon and other areas, while better managing long-term recreation opportunities.

***Issue: How will the BLM address the negative environmental impacts of increased recreation tourism in recent decades?***

*Comment Summary*

Commenters expressed concern over the increase in visitation since the COVID-19 pandemic and stressed visitors' impacts on soils, vegetation, and other critical resources. Commenters argued that the BLM should consider the increase in visitation and recreation use in the EIS, and adequately analyze those impacts. They argued that the BLM should consider better managing visitation to understand current and future recreation trends and their impact on GSENM. Commenters recommended the need to educate visitors to better protect GSENM resources and objectives.

***Lands and Realty***

***Issue: How will the BLM acquire and manage rights-of-way (ROWs) and lands within and adjacent to GSENM?***

*Comment Summary*

Commenters had suggestions on how the BLM should acquire lands and ROWs, as well as suggestions on how to maintain ROWs:

- The BLM should acquire private lands within GSENM as they become available for sale.
- The BLM should manage discretionary uses and ROWs in undisturbed lands to protect the lands within GSENM.
- Alternatives should not allow any commercial ROWs.
- Areas not currently in a ROW should be ROW exclusion areas.
- Access of ROWs to private inholdings can only be designated by law and should have to go through a NEPA analysis.

- ROWs can be established to exercise existing rights but should be placed to attempt to minimize impacts.
- The BLM should acquire additional lands
- The BLM should proactively attempt to acquire lands adjacent to GSENM.
- Using the Quiet Title Act, the BLM should prioritize acquiring the ROWs that currently exist adjacent to GSENM or within it.
- The BLM should maintain ROWs with appropriate tools.
- If a ROW is within a WSA, then maintenance should be done strictly with hand tools.

### **3.7.21 Travel, Transportation, and Access Management**

#### ***Issue: How will the BLM address motorized access in GSENM?***

##### *Comment Summary*

Most comments about travel, transportation, and access management were about the use of OHVs, four-by-four vehicles, and other motorized vehicles within GSENM's boundaries. Commenters were divided on how the BLM should approach this access issue. The considerations are:

- Keeping and maintaining all currently recognized roads within GSENM, and potentially allowing for expansion to create greater access, or
- Promoting limited vehicular access to protect valuable resources, such as soundscapes, artifacts, air quality, wildlife, biological soil crusts, vegetation, livestock, and water.

Additionally, the commenters in favor of limitation pointed to safety issues for users, emergency responders, and livestock related to motorized recreation. Some commenters also pointed to the objectives of Proclamations 6920 and 10268 as an obligation for the BLM to protect critical monument objects from OHV damage. Commenters also argued that current enforcement of illegal road creation is inadequate; therefore, the only way to prevent illegal activity is to close routes.

Supporters of OHV access argued that impacts are overblown and felt that dirt roads in GSENM allow for more visitors to experience points of interest and remote hiking trails. Many of these commenters also expressed interest in expanding the number of roads available for motorized access, arguing that if the BLM is going to consider closures, it would be fair to consider the opposite possibility. Finally, some of these commenters urged the BLM to discontinue the use of "open to administrative use" roads and allow these roads to be open to all.

Commenters from both sides want the BLM to produce publicly available maps that show travel access designations within GSENM so that it would be clearer to understand and comment on the issue.

Roads that are in contention and mentioned by both sides in their comments include:

- Hole-in-the-Rock Road
- Burr Trail Road
- V-Road
- Inchworm Arch Road
- Little Desert OHV Area

Another issue brought up by multiple commenters is parking. These commenters noted that the lack of parking near popular trailheads has led to damaged vegetation adjacent to roads where visitors attempt to park. They also noted the dangerous conditions when visitors park alongside roads. One commenter suggested the BLM conduct a parking study to fully understand the needs and locations in GSENM for parking development. One last issue noted by a commenter is that there is no analysis of oversized equipment access in GSENM, which may be needed for road repairs.

***Concern: How will the BLM address road conditions and traveler safety under this new RMP?***

*Comment Summary:*

Commenters expressed concern regarding the safety and environmental issues that are reflective of the current road conditions on Hole-in-the-Rock Road. Increased traffic degrades the quality of the road and results in potholes, washboards, and rutting. There was also concern regarding damage to habitat. Travelers attempt to avoid road hazards by creating new routes around the obstacle, which can damage surrounding habitat and landscape. These issues result in damage to vehicles and livestock for local citizens that use the road regularly. The commentor suggested chip sealing or paving various lengths of the road to decrease safety and environmental issues.

***Concern: Will the BLM continue to allow aircraft to land on backcountry airstrips?***

*Comment Summary*

Commenters interested in backcountry aircraft access were concerned that they may lose the ability to use remote airstrips in GSENM. Supporters of aircraft access argued that air travel is less impactful than other forms of travel, such as OHV riding. Commenters noted that airplane noise only lasts for a short duration, and many aviators take part in low-impact recreation once in GSENM, such as hiking and fishing. Additionally, these commenters noted that backcountry airstrip maintenance, which is often done by volunteers, is useful in search-and-rescue operations in GSENM.

### **3.7.22 Special Designations**

***Concern: Does the BLM plan to designate more special designation areas?***

*Comment Summary*

Commenters agreed on more special designations for GSENM. One commenter suggested Big Browns Bench as a RNA because it is an example of how the landscape would look without grazing. Other commenters suggested nonmotorized use of the areas to keep these areas quiet and pristine.

### **3.7.23 Wilderness and Wilderness Study Areas**

***Concern: To what extent will the BLM designate wilderness or WSAs on lands with wilderness characteristics in GSENM?***

*Comment Summary*

Though one commenter disagreed, noting that wilderness areas limit opportunities for motorized access, most commenters stated that they wished for the BLM to designate more land within GSENM as WSAs, and potentially future wilderness areas, to protect wildlife habitat, provide backcountry recreation opportunities, and safeguard significant resources such as water and cultural sites. Commenters cited FLPMA Sections 201 and 202, as well as the 1964 Wilderness Act, as an obligation for the BLM to inventory and protect wilderness-quality lands in GSENM. Multiple commenters were

concerned that if areas with wilderness characteristics are not protected, they may become damaged by human activity, limiting the future wilderness designation potential.

#### **3.7.24 ACECs**

***Issue: How will the BLM utilize the designation of new ACECs to protect resource values in GSENM?***

##### *Comment Summary*

Commenters provided specific descriptions, recommendations, and rationale for why certain areas should receive an ACEC designation. Commenters noted that ACEC designations are within the BLM's authority under FLPMA. Commenters suggested several resources to consider when analyzing ACEC designations, including wildlife, recreation, fire management, and mineral access; they requested that the range of alternatives reflect these considerations. ACEC nomination submissions include the Seaman's Wash-Petrified Hollow ACEC, Warm Creek ACEC, White Cliffs ACEC, and Willis Creek ACEC.

#### **3.7.25 Special Recreation Management Areas and Extensive Recreation Management Areas**

***Issue: How will recreation management be changed in the new GSENM RMP?***

##### *Comment Summary*

One commenter requested that the BLM provide greater clarity about special recreation management area and extensive recreation management area designations in the upcoming RMP. The commenter noted that current information is lacking, which limited the commenter's ability to comment on these management areas. The commenter hoped that management areas will be located in high visitation areas to limit impacts and to preserve ecological connections. Another commenter asked that the expansion of additional services be included to improve the Calf Creek Recreational Site.

#### **3.7.26 Wild and Scenic Rivers**

***Issue: How will the BLM protect river segments with consideration for wild and scenic rivers status to ensure the maintenance of their status in the National Wild and Scenic Rivers System?***

##### *Comment Summary*

Commenters were generally concerned about impacts on segments that are being considered for wild and scenic rivers status; they urged the BLM to include protection of these segments to maintain their status for potential inclusion in the National Wild and Scenic Rivers System. One commenter described the potentially suitable segments for wild and scenic river status from a 2009 analysis, which totaled 252.2 miles.

Commenters also encouraged the BLM to use the best available data when considering segments that may be considered wild and scenic rivers. One commenter also encouraged the BLM to consider climate change refugia, or areas that have greater resiliency toward a warmer and drier climate.

***Concern: Will the BLM share outstandingly remarkable values in detail and suitability study information?***

##### *Comment Summary*

Commenters encouraged the BLM to describe outstandingly remarkable values in detail in the EIS, explaining that these will be important in effectively managing those segments and creating stewardship



partnerships. If a new suitability study is pursued under NEPA, some commenters asked the BLM to provide the change conditions that led to that determination.

### **3.7.27 Other Special Designations**

***Issue: How will the BLM use additional special designations, such as RNAs, ONAs, etc. to ensure the protection of designated areas and sensitive resources ?***

#### *Comment Summary*

Several commenters were in favor of designations to Big Browns Bench, No Mans Mesa, Little No Mans Mesa, and Smoky Mesa as RNAs, and Spring Point and Little Spring Point as one RNA. One commenter suggested that backcountry conservation areas and wildlife migration corridors be specially designated to conserve and protect wildlife species. Commenters were also concerned with protections for these areas and noted that many of these designated areas consist of relict plant communities and rare plant species, and these areas serve as important habitats for both general and important wildlife species.

One commenter was opposed to more designations because the commenter felt that designated areas bring more recreation to the areas and further degrade the habitat. Other commenters felt that the Devils Garden ONA, Escalante Canyons ONA, North Escalante Canyon ONA, the Gulch ONA, and Phipps-Death Hollow ONA, as well as the Wolverine Petrified Wood Natural Environmental Area, should not be protected. Many commenters were concerned about the impacts of climate change, invasive species, and livestock grazing in these areas; they felt the BLM should incorporate these issues in the management plan.

### **3.7.28 Socioeconomics and Economic Analysis**

***Issue: How will management decisions resulting from the GSENM RMP affect local industries and the lives and livelihoods of nearby residents?***

#### *Comment Summary*

There was a wide range of economic concerns related to this RMP development process. One commenter expressed concern that conservation can be used as a tool for wealthy, private landowners to increase social inequality in small, tourism-reliant western towns by promoting conservation and land-use restrictions. As far as managing tourism, commenters were divided on what they would like to see in the area, but all agreed that GSENM is a major driver of visitation. Commenters agreed that land-use decisions should enhance the local economy and promote visitation. Some commenters desired a wider range of attractions and recreation opportunities to limit the seasonality of the current tourism economy and to expand visitation. Others promoted more restricted uses by keeping activities limited to those that leave lands unimpaired, such as wildlife viewing and heritage tourism, which they emphasized are more sustainable in the long term.

Another important industry, besides tourism, is cattle ranching. One commenter focused on the importance of livestock to Utah's agricultural economy, expressing concern that land-use decisions can impact the economic viability of some ranching families. On the other hand, one commenter requested that the draft EIS include an economic analysis of the social cost of carbon associated with methane emissions from cattle grazing in GSENM.

### **3.7.29 Environmental Justice**

#### ***Issue: How will the BLM ensure environmental justice principles are addressed in the GSENM RMP?***

##### *Comment Summary*

Two commenters focused on motorized access to public lands as an environmental justice issue that the BLM must address. These commenters maintained that disabled individuals have been left out of public land management planning; when OHV trails are closed, these individuals are excluded from access. The commenters pointed to President Joe Biden's Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government and the Department of the Interior's Equity Action Plan as support for why trails on public lands, including GSENM, must remain open to vehicle access.

Other commenters stressed the importance of making conservation and land-use decisions concerning environmental justice goals related to tribal interests, low-income populations, and minority populations. These commenters pointed to Proclamation 10286 and Executive Order 12898 to support this action; they recommended the BLM use the EPA's Environmental Justice Screen program to locate nearby environmental justice communities to be considered and included in decision-making and planning.

#### ***Issue: How will the BLM prioritize the needs of local communities in the GSENM RMP?***

##### *Comment Summary*

Commenters noted that because much of the land in Garfield and Kane Counties is federally managed, local communities are subject to changing federal land-use decisions that impact economic opportunities, such as agriculture and tourism. Additionally, one commenter asked the BLM to analyze the impacts of GSENM's designation on local community services, such as infrastructure and emergency response. Another commenter stated that the BLM should prioritize the permitting of local, traditional uses for nearby communities.

### **3.7.30 Wild Horses**

#### ***Concern: How will the BLM consider necessary habitat components and past management actions concerning herd areas?***

##### *Comment Summary*

One commenter expressed concerns about wild horses being included in the management plan because the commenter believed the herd area was zeroed out as part of an ongoing management plan for wild horses, even if a small population persists. The Wild and Free Roaming Horses and Burros Act permits the BLM to zero out a herd area where the habitat lacks the necessary components for the management of wild horses.

### **3.7.31 Noise**

#### ***Issue: How will the BLM manage impacts on the natural soundscape in GSENM?***

##### *Comment Summary*

Multiple commenters expressed interest in the BLM pursuing actions to limit soundscape disturbance in GSENM. Activities that were noted to degrade the auditory experience include helicopters, OHV use, and drones. Commenters stated that noise not only disrupts the visitor experience in a natural setting but also can be harmful to wildlife. Some strategies suggested to limit noise disturbances were muffler

and decibel requirements, limiting airplane and helicopter tours, and closing roads to motorized use in sensitive areas (such as No Mans Mesa). One commenter suggested that the BLM review the soundscape management plan developed for Zion National Park, which could serve as a model for a similar GSENM plan. Commenters argued that allowing activities that disturb the natural soundscape goes against the purpose of GSENM, as stated in presidential proclamations. One dissenting commenter denied that sound disturbance is a real issue; this commenter believed that management of soundscapes is overreaching and impractical.

***Concern: How will the BLM mitigate the impacts of noise on the natural soundscape and wildlife species?***

*Comment Summary*

Commenters expressed concerns about the impact noise will have on the natural soundscape and wildlife species known to be sensitive to the effects of human-caused noise in GSENM. Management recommendations and requests regarding noise within GSENM included:

- Implementing management uses to protect and maintain the natural soundscape and to minimize noise levels
- Preserving animal and riparian habitats so natural sounds prevail
- Protecting visitors' experience of natural quiet and solitude
- Posting signage to indicate the need for low voices and low volumes, especially in backcountry areas
- Prohibiting the use of drones and limiting aerial motorized traffic
- Prohibiting motorized vehicle use causing noise levels exceeding 55 decibels
- Recommending to the Federal Aviation Administration that civilian aircraft be prohibited from flying lower than 1,500 feet above the ground, except for search-and-rescue and other necessary actions to protect GSENM objects
- Conducting soundscape modeling for management actions with the potential to alter baseline soundscape conditions
- Developing a soundscape management monitoring plan, in consultation with tribes, that identifies noise-sensitive receptors and sets noise thresholds that are modeled, actual, and monitored

### **3.7.32 Soils**

***Issue: How will the BLM address past mitigation measures to protect cryptobiotic soils that were unsuccessful and ensure that potential future management will not lead to further deterioration?***

*Comment Summary*

Some commenters stated that current and past mitigation actions that were developed to protect the biological soil crusts have been unsuccessful. Commenters were concerned that multiple uses have the potential to continue to degrade biological soil crusts. Commenters explained that soil crusts are generally slow to recover from damage, and they would like to know how the BLM will protect these soils. Commenters requested that the BLM identify and inventory areas with impaired biological soil

crusts, determine the cause of impairment, and implement management strategies that will lead to the recovery of these biological soil crusts.

***Issue: How will the BLM ensure the best available survey data and new scientific analyses regarding biological soil crusts and overall soil health are incorporated into the analysis and management decisions?***

*Comment Summary*

Commenters expressed that the BLM should use the best available scientific data for analyzing biological soil crusts. Commenters requested that the BLM consider advances in technology to see the changes to biological soil crust features over time in the BLM's analysis; they also requested that the BLM inventory and map areas where biological soil crust information is currently unavailable. Commenters asked that the BLM ensure that soils exhibit infiltration, permeability, and erosion rates appropriate for their soil type, climate, and landform. They also asked for the BLM to ensure it considers the effects of climate change.

Several commenters would like the BLM to incorporate past studies, including the 2000–2003 rangeland health survey and other bare soil and biological soil crust surveys from the Natural Resources Conservation Service, into the analysis. Commenters also requested that the BLM include a scientific analysis of potential impacts on soils and biological soil crusts in the analysis of proposed actions.

***Issue: How will the BLM study the impact of proper grazing on soil health and biological soil crusts?***

*Comment Summary*

Commenters were divided on the impacts of grazing on soil health and biological soil crusts; however, overall, they would like more analysis, including both positive and negative impacts. Commenters requested that the BLM incorporate limits on grazing to protect soils, while others requested the BLM to consider monitoring data that show there is no significant recovery to impaired biological soil crusts when grazing is present.

***Issue: Will the BLM use methods to measure the changes in air quality resulting from damage to soil and biological soil crusts?***

*Comment Summary*

One commenter requested that the BLM consider developing and implementing methods to quantitatively measure changes in air quality, especially particulate matter concentration, associated with damage to biological soil crusts.

***Issue: How will the BLM manage negative impacts on biological soil crusts from OHV travel?***

*Comment Summary*

Commenters expressed concerns about the detrimental impacts of OHV travel on biological soil crusts. Commenters urged the BLM to limit OHV travel to specific trails to protect this resource.

***Issue: How will the BLM consider the impacts on soils from surface-disturbing activities and on erodible soils in each alternative?******Comment Summary***

One commenter explained the prevalence of highly erodible soils in GSENM and their potential to degrade water quality. Commenters requested that the BLM include information about surface-disturbing activities, such as OHV activities and livestock grazing, that have already resulted in erosion and sediment loading, resulting in impaired waterbodies. To disclose and mitigate further surface erosion, commenters also requested that the BLM include an estimate of erosion rates and the resulting impacts on water quality for each alternative. Finally, commenters requested that the draft EIS include specific design features and best management practices that the BLM would implement in areas that contain highly erosive soils.

***Socioeconomics******Concern: Will the socioeconomic analysis acknowledge the financial impacts that different alternatives may have on recreation access and tourism?******Comment Summary***

Commenters expressed that the BLM should consider developing an alternative that corrects the socioeconomic trends in the western communities surrounding GSENM and looks at the financial impact the conservation alternative would have on organizations.

***Concern: Will the effects of socioeconomic inequities be addressed and mitigated?******Comment Summary***

One commenter suggested that dispersed camping should be applied as a management tool for offsetting socioeconomic inequities; this is because wealthy residents are displacing lower- to middle-income families from accessing GSENM areas. Another commenter suggested that the BLM incorporate the findings of *The Slums of Aspen*:

***Concern: How will the RMP incorporate Kane County's policies regarding socioeconomic?******Comment Summary***

A commenter stated that any proposed change in land use must evaluate, mitigate, and minimize impacts on the county's customs, culture, and economic stability

***Concern: Will the RMP consider and determine the best alternative for ensuring a sustainable tourism economy?******Comment Summary***

One commenter requested that the BLM determine the most protective management alternative for GSENM that would recognize tribal communities and visitors' interests and ensure a healthy monument and a sustainable tourism economy.

***Concern: How will the RMP ensure the voices of Escalante and Boulder Chamber of Commerce members take priority over those of the county commissioners and state legislators?******Comment Summary***

The former mayor of Boulder conveyed that GSENM's gateway communities' economies rely on the attraction of GSENM and requested that local voices, specifically business leaders in gateway

communities, be judged as an important factor. The mayor suggested that these voices should outweigh those of the county commissioners.

### **3.7.33 Mining and Geologic Resources**

#### ***Issue: How will the BLM address valid existing rights and mineral applications?***

##### *Comment Summary*

Commenters were interested in the BLM investigating and protecting valid existing rights in GSENM. Commenters also stressed that new applications for minerals that do not have valid existing rights should be denied, and applications that are noncompliant should be terminated.

### **3.8 OUT OF SCOPE COMMENTS**

#### ***Comment Summary***

Multiple comments were received that were determined to be out of scope. The majority of these comments pertain to BLM staffing and funding, which the RMP/EIS planning process does not address.

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# Appendix A

## Substantive Public Comments

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# Appendix A. Substantive Public Comments

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Action Committee	CTVA	Capital Trail Vehicle Association	Other BLM guidance, plans, and policies	.The Supreme Court released a decision in West Virginia vs. EPA( <a href="https://www.supremecourt.gov/opinions/21pdf/20-1530_n758.pdf">https://www.supremecourt.gov/opinions/21pdf/20-1530_n758.pdf</a> ), that established when federal agencies are exceeding their regulatory powers. This decision should result in opportunities for examination of existing regulatory powers for federal agencies. For example, if Congress hasn't given explicit authorization to create Subpart C travel management rules to regulate OHV and snowmobiling recreation, then the agency may not have the regulatory authority to create these rules.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Gagner	Paul	Dreamland Safari Tours	Other BLM guidance, plans, and policies	The new GSENM management plan should use as a template the 2000 management plan. This plan was developed with input from all major stakeholders over years, unlike the Trump management plan which was rushed and without input from key stakeholders. Guides are a key stakeholder not included in the Trump plan, and guides need to have a voice on the MAC.	N/A
Popejoy	Mike	Grand Canyon Trust	Other BLM guidance, plans, and policies	The Special Status Plant Species plan components SSP-1, 2 and 3 from the 2000 MMP are consistent with Proclamation 10286 and remain relevant to the management of the Monument. We propose that their contents be considered for inclusion in the new RMP.	GESNM_Scoping_Comments.pdf
Popejoy	Mike	Grand Canyon Trust	Other BLM guidance, plans, and policies	Traditional knowledge should be incorporated in the identification and management of culturally relevant plants. The BLM should follow guidance in the Bears Ears Inter-tribal Coalition's tribal Land Management Plan for Bears Ears National Monument, which states that vegetation should be managed "to support medicinal plants and other vegetative resources deemed by (Tribes) as being culturally relevant where management is consistent with the proper care and management of objects and values."	Appendix A - Figures & Tables.pdf
Dissel	Scott	N/A	Other BLM guidance, plans, and policies	There are many other resources, areas, and values that need consideration in your scoping efforts. I will include those values with this addition: all the values, areas, and resources mentioned in either the "Summary of Goals of the 2021 Monument Proclamation" or "Objects of Value of the 2021 Monument Proclamation" should be protected by the BLM RMP to the greatest extent possible, prioritizing these values over other uses and activities such as motorized recreation, resource extraction, cattle grazing, water development, rangeland (so-called) improvement or any other lasting human impacts.	Grand Staircase Escalante Management Plan comments 9.27.2022.pdf
Murray	Danielle	N/A	Other BLM guidance, plans, and policies	BLM must also adhere to management standards and established policies for managing national monuments as units of the National Conservation Lands. The BLM has developed extensive guidance and standards for the management of National Monuments. <sup>8</sup> These standards ensure that lands within the system are managed consistently for conservation and safeguarded for future generations. Conservation standards for the system have been outlined in Department of the Interior guidance and BLM policies including: 1)In 2010, Secretarial Order 3308 established a unified conservation vision for managing the National Conservation Lands 'as required by the Omnibus Act of 2009' to "conserve, protect, and restore nationally significant landscapes." <sup>13</sup> 13 <a href="https://www.blm.gov/sites/default/files/docs/2021-12/GSENM_Interim_Guidance_12-16-21_Final508_0.pdf">https://www.blm.gov/sites/default/files/docs/2021-12/GSENM_Interim_Guidance_12-16-21_Final508_0.pdf</a> 2)In 2011, BLM released the 15-Year Strategic Plan, setting specific goals for how to manage the National Conservation Lands focused on conservation, protection and restoration. <sup>14</sup> <a href="https://www.blm.gov/programs/national-conservation-lands/about/15-year-strategy">https://www.blm.gov/programs/national-conservation-lands/about/15-year-strategy</a> 3)In 2012, BLM Manual 6220- National Monuments, National Conservation Areas, and Similar Designation was released that interpreted the national policy and set guidance for daily management decisions. <sup>15</sup> 15 <a href="https://www.blm.gov/sites/blm.gov/files/mediacenter_blmmanual6220.pdf">https://www.blm.gov/sites/blm.gov/files/mediacenter_blmmanual6220.pdf</a> BLM Policy Manual 6220 establishes conservation standards for National Monuments. In development of Monument Management Plans, the manual states that BLM must: - Clearly identify Monument and NCA objects and values as described in the designating proclamation or legislation; where objects and values are described in the designation 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; and - Identify specific and measurable goals and objectives for each object and value, as well as generally for the Monument; and - 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; and - Provide, to the extent possible, a thorough quantitative analysis of the effects of all plan alternatives on the objects and values; and - Where a thorough quantitative analysis is not possible, provide a detailed qualitative analysis of the effects of all plan alternatives on the objects and values; and - Include a monitoring strategy that identifies indicators of change, methodologies, protocols, and time frames for determining whether desired outcomes are being achieved. <sup>16</sup> 16 <a href="https://www.blm.gov/sites/blm.gov/files/mediacenter_blmmanual6220.pdf">https://www.blm.gov/sites/blm.gov/files/mediacenter_blmmanual6220.pdf</a> The development of the management plan, the full range of alternatives and ultimately the final plan for the Grand Staircase must fulfill and be within the scope of these policies.	Scoping Comments GSENM- Conservation Lands Foundation.pdf
Eaton	Marietta	N/A	Other BLM guidance, plans, and policies	Another source of information regarding the 6220 Manual is an all but completed set training modules (in person and online) for Monuments and National Conservation units. This two-year endeavor created training to clarify and support the 6220 Manual. The effort was abandoned by the Trump administration. A cadre of NLCS managers, along with seasoned staff in recreation, transportation, and landscape architecture developed several modules with the support of National Training Center (NTC) staff facilitating the process and providing quality control. This trove of information is available at BLM's National Training Center in Phoenix.	GSENM NOI Response.docx
WARD	EVERETT	N/A	Other BLM guidance, plans, and policies	BLM should rely on management principles described in the Monz Recreation Report and provide a zoned approach that concentrates recreation and visitor use in front country locations and protects primitive backcountry experiences throughout most of the Monument.	N/A
Eaton	Marietta	N/A	Other BLM guidance, plans, and policies	It is imperative that the Bureau analyze a 'no grazing' alternative so that the BLM can make an informed decision that allows the decision maker to consider both grazed and ungrazed options.	GSENM NOI Response.docx
J	A	N/A	Other BLM guidance, plans, and policies	SEED COLLECTION: I prefer the terms of managing seed collection layed out in the original plan, as they minimize impact to this delicate ecosystem and acknowledge Native American and scientific research use. Language concerning documentation of collection, as well as cumulative impacts of seed collection should be addressed.	GSENM_20220923.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Eaton	Marietta	N/A	Other BLM guidance, plans, and policies	The 6220 Manual provides a good foundation for the current iteration of Grand Staircase-Escalante National Monument's third RMP: The purpose of this manual is to provide guidance to Bureau of Land Management (BLM) personnel on managing BLM public lands that are components of the BLM's National Landscape Conservation System (NLCS) and designated by Congress or the President as National Monuments, National Conservation Areas, and similar designations (collectively "Monuments and NCAs" or "components"). Similar designations include Yaquina Head Outstanding Natural Area, Piedras Blancas Historic Light Station Outstanding Natural Area, Jupiter Inlet Lighthouse Outstanding Natural Area, Headwaters Forest Reserve, Steens Mountain Cooperative Management and Protection Area, and other areas established by Congress in the future pursuant to the Omnibus Public Land Management Act of 2009 (OPLMA) (16 U.S.C. 7202), Section 2002(b)(2)(E). According to OPLMA, the NLCS was established to "conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations." (Emphasis added). Obviously, BLM has a good deal more information on GSENM after a quarter century and must now refine and articulate how that body of knowledge will be applied for more effective management. How will the existing 6220 manual direction be incorporated into the plan? The NOI mentions "preserve and restore" versus the "conserve, protect, and restore" of the 6220 Manual." Will there be changes to the manual? So far BLM has failed to acknowledge that conservation is one of the many multiple uses in BLM, one that favors protection over extraction. How does the new proclamation add to or change the original philosophical intent, if at all?	GSENM NOI Response.docx
Eaton	Marietta	N/A	Other BLM guidance, plans, and policies	The BLM report for the Implementation Schedule Review Report (2010 see above) should be on file at GSENM and provides a snapshot of the status of resource conditions and accomplishments by 2010. This report offers excellent background regarding the status of plan decisions developed initially to protect resources, objects, and values (ROVs) identified in the proclamation. Reviewing the report will illustrate the decisions that were enacted, and those which were not or could not be implemented. The report serves as a baseline to address the significant human caused dilemmas and critical biological trends caused by human activities and nuances of climate effects.	GSENM NOI Response.docx
Not Provided	BLM is no friend to GSENM	N/A	Other BLM guidance, plans, and policies	BLM should fairly evaluate how well it has implemented the existing GSENM plan. I suspect that after many years this implementation fell short in many important respects. This is relevant because it will put this current RMP planning process in a realistic perspective.	N/A
Walker	Joro	Western Resource Advocates (WRA)	Other BLM guidance, plans, and policies	BLM is obligated to manage monuments under its jurisdiction "as part of the National Landscape Conservation System... to conserve, protect, and restore nationally significant landscapes recognized by the President or Congress for their outstanding ecological, cultural, or scientific resources and values." Secretarial Order 3308 states that the National Conservation Lands "shall be managed as an integral part of the larger landscape, in collaboration with the neighboring land owners and surrounding communities, to maintain biodiversity, and promote ecological connectivity and resilience in the face of climate change." BLM's 15-Year Strategy for the National Conservation Lands discusses utilizing large-scale assessments, such as BLM's Rapid Ecoregional Assessments (REA), to identify how to connect and protect resources at the landscape-level.	wra gsenm rmp scoping 9 18 2022.pdf
Sorenson	Craig	N/A	Relevant Federal, State, Local laws and regulations	- This Management Plan is an update to the 2000 Management Plan for the Grand Staircase Escalante National Monument. Basically 90% plus of this plan is in place and has been working for 22 years. - The focus continues to be on the National Lands and Conservation System (NLCS) mission and Proclamation vs FLPMA; decisions implemented in the 2000 Management Plan continue to apply including recreations zones, group size limits, no competitive events, seeding with native plants and protecting pinyon-juniper-sage ecosystem vs "treatments", protecting lands that qualify as wilderness study areas and so forth and so on.	GSENM Management Plan Comments.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	FLPMA	The agency should adequately consider that any conversion of lands designated by congress for multiple-use to defacto wilderness lands circumvents congressional laws regarding multiple use and the wilderness designation process.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Anon	Anon	Garfield County	FLPMA	FLPMA (43 USC 1712(c)(9)) requires the BLM to coordinate Plans with the land use planning and management programs of the States and Local Governments within which the lands are located. The BLM Land Use Plans "shall be consistent with State and local plans to the maximum extent [the Agency] finds consistent with Federal law and the purposes of this Act. "3	N/A
Popejoy	Mike	Grand Canyon Trust	FLPMA	The Monument was designated with the explicit purpose of protecting and preserving the historic, prehistoric, and scientific resources throughout the landscape. Accordingly, the standard approach to multiple-use management does not apply to the Monument, and any effort to adopt such a management approach to the detriment of the objects for which it was designated would be in violation of the Proclamations and the mandates of FLPMA and the Omnibus Public Lands Management Act of 2009.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	FLPMA	The Federal Land Policy and Management Act (FLPMA) requires BLM to manage public lands under multiple-use principles unless an area has been designated by law for specific uses, in which case BLM must manage the land for those specific uses. 43 U.S.C. § 1732(a). In other words, BLM must manage national monuments not under the FLPMA multiple use mandate, but rather under the language of the Proclamation establishing the monument	Appendix C - ACECs.pdf
Jackson	Thomas and Marilyn	Star Ranch LLC	FLPMA	If the original acreage is added back, we believe MORE access needs to be given, not less. At least, keeping recognizing current leases and permits should be perpetual and not closed and ended. Federal laws FLPMA of 1976 and NEPA provide "BLM shall manage the public land under principles of multiple use and sustained yield ... except that where a tract of land has been dedicated to specific uses"	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	FLPMA	While it is true that the GSENM's designation withdrew the lands within the GSENM from mineral location and development (including the vast reserves found in the Kaiparowits Plateau), there are a number of active mining claims and fluid mineral leases on the Monument. As stated above, the State supports/promotes the responsible development of "minerals that are necessary to meet present needs and future economic growth and community expansion in each county where the subject lands are situated." As such, it is imperative that the GSENM fully analyze the existing mining claims, fluid mineral leases and mine permits/plans already in place and in accordance with FLPMA's coordination and consistency requirements, ensure that these claims are not impeded.	GSENM RMP Scoping Comments 27SEPT2022.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	FLPMA	In addition to the Coordination requirement listed above, the BLM has the responsibility in the development of land use plans to ensure that consideration is given to the applicable state, local, and tribal plans "and to resolve, to the extent practical, inconsistencies between Federal and non-Federal Government plans."(14) Specifically, FLPMA states that BLM Land Use Plans "shall be consistent with State and local plans to the maximum extent [the Agency] finds consistent with Federal law and the purposes of this Act."(15) The National Forest Management Act ("NFMA") contains a similar requirement, stating that U.S. Forest Service ("USFS") Forest Plans be "coordinated with the land and resource management planning processes of State and local governments and other Federal agencies."(16) (14) Id. at 8. (15) 43 U.S.C. §1712(c)(9). (16) 16 U.S.C. §1604(a).	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	FLPMA	It appears that when President Biden decided to issue the Grand Staircase Proclamation that little consideration was given to State and County concerns, nor to the relevant State Code, SRMP, or CRMPs. However, given the seriousness of the impacts/implications of the GSENM designation, the State now specifically requests that under the Coordination and Consistency requirements of FLPMA, that any and all actions taken by the BLM and DOI within the GSENM be consistent with the Utah State Code, the Utah SRMP, the Garfield CRMP, and the Kane CRMP to the greatest degree possible. The relevant portions of each of these Resource Management Plans ("RMP") related to the current planning process are discussed below where appropriate.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	FLPMA	On a further introductory note, it is important to highlight the fact that under the Federal Land Policy and Management Act ("FLPMA"), when developing or creating Resource Management Plans, federal agencies, such as the BLM, are required to coordinate their plans with state and local government plans.(12) This coordination process is a separate process from cooperation and must occur regardless of whether state or local governments were designated as Cooperating Agencies.(13) Thus, even if the State were not a Cooperating Agency in the current GSENM RMP planning process (which it is), the BLM would still be required to make efforts in drafting land use plans that are consistent with state and local plans in this situation. (12) FLPMA 202(c)(9) (13) Utah State Resource Management Plan (Utah SRMP), pp. 9, available at: <a href="https://rmp.utah.gov/state-of-utah-resource-management-plan/">https://rmp.utah.gov/state-of-utah-resource-management-plan/</a> (2018).	GSENM RMP Scoping Comments 27SEPT2022.pdf
Cutler	Clayton	Kane County Utah	Taylor Grazing Act	The Taylor Grazing Act10 (TGA) established grazing rights for ranchers through a permit process. Federal courts have interpreted the TGA preamble to "(1) provide for the most beneficial use possible of the public range in the interest of ranchers themselves but also the public at large; (2) "... to define their grazing rights and to protect those rights, by regulation, against interference; and (3) to stabilize the livestock industry dependent upon the [grazing] public range" There is evidence that Congress intended for "public domain grazing patterns and forage use quantities [AUMs] to be recognized as grazing use (usufructuary) rights subject to Fifth Amendment protection from takings."11 10 Title 43, Chapter, §315-316. Established June 28, 1934. 11 Kane County Resource Management Plan, p. 56.	Scoping Letter GSENM -signed.pdf
Bauman	Sarah	Grand Staircase Escalante Partners	National Historic Preservation Act	The Protocol Agreement (regarding the manner in which the Bureau of Land Management will meet its responsibilities under the National Historic Preservation Act) and all policies included in the GSENM resource management plan that are related to NHPA should be updated in consultation with the Tribes and be responsive to the Memorandums of Understanding and Secretarial Order Issued by the Biden Administration as well as and tribal input solicited by the Council on Environmental Quality consultations. - Tribal comments received during Council on Environmental Quality consultations on the President's America the Beautiful Initiative September 27th - November 23rd, 2021, at <a href="http://www.whitehouse.gov/wp-content/uploads/2022/03/Atb-tribal-Consultation-Summary.pdf">www.whitehouse.gov/wp-content/uploads/2022/03/Atb-tribal-Consultation-Summary.pdf</a> - Memorandum of Understanding (MOU) regarding Interagency coordination and collaboration for the Protection of Indigenous Sacred Sites - Tribal Treaty rights MOU and related to co-management of federal lands with Tribes and DOI - Direction for implementing provisions of Joint Secretary's Order 3403 (SO 3403), Fulfilling the Trust Responsibility to Indian Tribes in the Stewardship of Federal Lands and Waters. BLM guidance (Permanent Instruction Memorandum 2022-011) - National Cultural Resources Procedures Handbook In addition, the Bears Ears Inter-Tribal Coalition developed a land management plan with insights and guidance that could be utilized to help inform consultation with Tribes of GSENM and ensure that this consultation is culturally responsive and sensitive. - Bears Ears Inter-tribal Coalition Collaborative Land Management Plan for Bears Ears National Monument, at <a href="https://www.bears earscoalition.org/wp-content/uploads/2022/08/FINAL_BENM_LMP_08252022.pdf">https://www.bears earscoalition.org/wp-content/uploads/2022/08/FINAL_BENM_LMP_08252022.pdf</a> The following is a relevant excerpt from the Bears Ears Inter-Tribal Coalition Land Management Plan that describes the importance of the inclusion of traditional knowledge (led by the Tribes) during the process of assessing eligibility for historic properties as well as identifying, evaluating, assessing, and resolving adverse effects to historic properties of religious and cultural significance: Although the term "traditional knowledge" is not defined in the National Historic Preservation Act (NHPA) or its implementing regulations, its role in the Section 106 process is obviated by the requirement, at 36 CFR Section 800.4, that agency officials "acknowledge that Indian tribes and Native Hawaiian organizations (NHOs) possess special expertise in assessing the eligibility of historic properties that may possess religious and cultural significance to them." Traditional knowledge is an integral part of that special expertise. The Advisory Council on Historic Preservation (ACHP) applies the term "traditional knowledge," for purposes of Section 106, to the information or knowledge held by Indian tribes and NHOs and used for identifying, evaluating, assessing, and resolving adverse effects to historic properties of religious and cultural significance to them (ACHP 2021:1).	Final GSEP NHPA Section 106 Consultation Comments, 9-27-22.pdf
McCoy	Melissa	U.S. EPA Region 8	National Historic Preservation Act	National Historic Preservation Act Consultation for tribal cultural resources is required under Section 106 of the National Historic Preservation Act (NHPA). Historic properties under NHPA are properties that are included in the National Register of Historic Places (NRHP) or that meet the criteria for NRHP. Section 106 of NHPA requires a federal agency, upon determining that activities under its control could affect historic properties, to consult with the appropriate State Historic Preservation Office (SHPO)/Tribal Historic Preservation Office (THPO). Under NEPA, any impacts to tribal, cultural, or other treaty resources must be disclosed in the Draft EIS. Section 106 of NHPA requires that federal agencies consider the effects of their actions on cultural resources, following the regulation at 36 CFR Part 800. In the Draft EIS, we recommend discussing how BLM would avoid or minimize adverse effects on the physical integrity, accessibility, or use of cultural resources or archaeological sites, including traditional cultural properties (TCPs), throughout the planning area. Clearly discuss mitigation measures for archaeological sites and TCPs. We encourage BLM to append any Memoranda of Agreements to the Draft EIS, after redacting specific information about these sites that is sensitive and protected under Section 304 of NHPA. We also recommend providing a summary of all coordination with tribes and with the SHPO/THPOs, including identification of NRHP eligible sites and development of a Cultural Resource Management Plan.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Action Committee	CTVA	Capital Trail Vehicle Association	Endangered Species Act	The agency should adequately consider that motorized closures are being enacted using the Endangered Species Act when there is no site-specific data and studies documenting a significant connection between OHV and e-bike recreation and significant impacts on an endangered species.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Jackson	Thomas and Marilyn	Star Ranch LLC	Endangered Species Act	We recommend in accordance with the Endangered Species Act of 1973, that only those species with historic or known habitats in Kane, San Juan and Garfield County be listed when considering growth and development. We specifically recommend that any specie categorized as BLM sensitive should state GPS location or that it is the ONLY population of this specie in the United States, or that a small concise area of the population be protected, not the entire two million acres of GSENM. That language of 'potential' habitats or 'possible sightings' should not be listed as credible without photographic evidence, witness testimony, and positive GPS identification. With drone surveillance, populations could be monitored without disturbance.	N/A
Action Committee	CTVA	Capital Trail Vehicle Association	Other Federal Laws and Regulations	The agency's implementation of the travel management rule must be corrected to address these deficiencies starting with the Grand Staircase-Escalante National Monument RMP.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Not Provided	A Utah resident and BLM stakeholder	N/A	Other Federal Laws and Regulations	As you know, the GSENM is a component of the National Landscape Conservation System (NLCS), which was established "to conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations" and therefore the BLM is required to manage it "in a manner that protects the values for which the components of the system were designated" (16 USC 7202). This requirement is reflected in the GSENM Antiquities Act Proclamation which is the "dominant reservation" and supersedes normal BLM multiple use and sustained yield FLPMA management.	Recreation Report_Sept 2021.pdf
Berry	Scott	N/A	Other Federal Laws and Regulations	At several points in the NOI reference is made to management under the traditional principles of multiple use and sustained yield. For example, in the NOI section titled, Nature of the Decision To Be Made, the decision is described as a selection of land planning decisions for managing BLM-administered lands under the principles of multiple use and sustained yield in a manner that best addresses the purpose and need. Another example is found in Paragraph 7 of the Purpose and Need section, which invokes multiple use as the context for the planning process. Unfortunately, the invocations of "multiple use" are incomplete and potentially misleading, because they do not reference to Section 302 of the Federal Land and Policy Management Act (FLPMA), which establishes an exception to the general multiple use / sustained yield mandate where a tract of such public land has been dedicated to specific uses according to any other provision of law. This exception to the general multiple use / sustained yield mandate certainly applies to lands of GSENM, which have been dedicated to meeting the objectives set out in Proclamation 10286. The application of this exception to GSENM was emphasized in the guidelines issued by the Director of the BLM for the Interim Management of GSENM (Dec. 16, 2021), which states, "typical multiple use management is superseded by the direction in Proclamation 10286 to protect monument objects." Where the language traditional "multiple use / sustained yield" mandate is referred to in the NOI, those reference should be clarified to reflect that the mandate has been superseded by Proclamation 10286 and has application only when it is established that other proposed uses will not result in harm to the objects and values described at length in the Proclamation.	N/A
Berry	Scott	N/A	Other Federal Laws and Regulations	In the Summary section of the document, the first paragraph of the NOI lists the statutory and legal direction for issuing the NOI, and for the planning process in general. However, the list omits any reference to the Omnibus Public Land Management Act of 2009 (16 U.S.C 7202), establishing the National Landscape Conservation Lands System. Proclamation 10286 specifically directs that the monument shall be managed, "as a unit of the National Landscape Conservation System." This omission was probably the result of simple clerical error. However, correcting the omission at this early stage will help ensure that the omission is not repeated at future stages of the planning process.	N/A
Veranth	John	N/A	Other Federal Laws and Regulations	Roads will be one of the most difficult areas of management planning due to the mix of legalities and emotions. As a local resident I urge all parties to address RS2477 road claims in a rational manner. The decades of political posturing and procedural arguments has not served the land well. Compromises will be needed, adjudication is a last resort, and no one will be happy with the road outcomes.	Veranth Scoping 926.pdf
Not Provided	Remove the GSENM cattle	N/A	Other Federal Laws and Regulations	The Antiquities Act and GSENM Proclamation are the dominant legal reservation and supersede FLPMA multiple use management. Even FLPMA indicates that for special designations, like the GSENM, those protective designations supersede normal multiple use management. BLM managers ignore this legal context because they put career security and political expediency above doing their jobs.	Climate & livestock on public lands_Beschta et al_2013.pdf
Not Provided	BLM must protect monument objects	N/A	Other Federal Laws and Regulations	I do not think that cattle grazing and OHV recreation are appropriate uses in GSENM. National Parks generally don't allow those uses. Why does BLM think they are okay in national monuments? Many current NPS national parks were initially protected as national monuments. BLM should manage their national monuments more like national parks. The Antiquities Act governs BLM national monuments management not FLPMA. Monument objects must be protected, not multiple uses.	N/A
Cox	Steven	N/A	Other Federal Laws and Regulations	The entire GSENM landscape is an object of historic and scientific interest requiring protection under the Antiquities Act.	Comments on the Management Plan for the Grand Staircase Escalante National Monument.docx
Citizen	Utah	N/A	Other Federal Laws and Regulations	The protection of monument objects is the dominant reservation under the Antiquities Act GSENM Biden Proclamation. This means that this protection supersedes BLM's normal FLPMA multiple use management. BLM therefore should not approve any human uses or projects that would or may harm monument objects. If the science is uncertain, then object protection should be given preference under the precautionary principle. This legal context must be explained and crystal clear during the entire RMP planning and NEPA process. All proposed RMP goals, objectives, and decisions must be consistent with this context and designed to ensure and advance object protection.	N/A
Lind	Gregar	N/A	Other Federal Laws and Regulations	Please restore the GSENM to its former boundaries and offer the full protections of the Antiquities Act.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Other Federal Laws and Regulations	In conjunction with the Paleontological Resources Preservation Act, we recommend that all specimens, fossils, and removed objects are stored at local museums and heritage centers within Garfield and Kane Counties, and that any known to have been transferred elsewhere, be returned.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Other Federal Laws and Regulations	The Antiquities Act requires : "that any reservation of land as part of the monument be confined to the smallest area compatible with the proper care." Therefore, enlarging the management area is in direct conflict with the Proclamation 9682 of December 4, 2017.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Jackson	Thomas and Marilyn	Star Ranch LLC	Other Federal Laws and Regulations	Under the Omnibus Public Land Management Act of 2009, that ongoing plans to expand the Calf Creek Recreation Site be upgraded and expanded to include improving the approach and one-lane bridge off Highway 12, expanding the campsites, adding a second restroom facility on the south side of the main access road, upgrading historic signs and interpretations to include the history of the name 'Calf Creek', and allow all historic and traditional uses, including a functional group area, vehicle parking and telephone service. Electric vehicle charging stations and Wi-Fi should be planned for.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Other Federal Laws and Regulations	We recommend that in compliance with the Wild and Scenic Rivers Act, that intermittent streams of Garfield and Kane Counties be exempt from consideration, so that erosion control and downstream impacts and destruction do not occur, such as excess debris filling Lake Powell.	N/A
Walker	Joro	Western Resource Advocates (WRA)	Other Federal Laws and Regulations	Because the Monument was created under the Antiquities Act, BLM is charged with carrying out the "proper care and management" of the objects identified in the Proclamations as qualifying for protection as "national monuments." 16 U.S.C. § 431. Therefore, management of the Monument must ensure that the objects specified in the Proclamations are protected, meaning that they are shielded from harm, injury and damage. Id. BLM further manages monuments under its jurisdiction as part of the National Landscape Conservation System to conserve, protect, and restore nationally significant landscapes recognized by the President or Congress for their outstanding ecological, cultural, or scientific resources and values.	wra gsenm rmp scoping 9 18 2022.pdf
Walker	Joro	Western Resource Advocates (WRA)	Other Federal Laws and Regulations	In addition, under the Land Exchange Act, Congress plainly decreed that "noneconomic scientific, historic, cultural, scenic, recreational, and natural resources, including ancient Native American archeological sites and rare plant and animal communities," values that include or are directly dependent on water resources, of the exchanged lands must be protected from harmful activities in the same way that the Antiquities Act and Proclamation 6920 safeguard Monument Objects within the original boundaries of the Monument. Further, by recognizing that harmful activities on the exchanged lands may not be allowed to injure Monument Objects on surrounding lands, Congress also determined and directed that Monument Objects on these adjacent lands must be protected from any harmful activities. Congressional action relative to the management of public lands may not be contradicted or ignored by BLM. Therefore, BLM must manage the exchanged lands and the lands adjacent to the exchanged lands in accordance with the Land Exchange Act.	wra gsenm rmp scoping 9 18 2022.pdf
Griffin	Simone	BlueRibbon Coalition	Executive orders	The Biden Administration's focus on equity, however, changes the equation. While the ADA focuses only on equality of opportunity, equity inherently focuses on equality of outcome. Any policy that is facially neutral but disproportionately harms a disadvantaged or marginalized group is considered inequitable. The BLM is therefore required by this executive order and others mandating that federal agencies consider "environmental justice" in NEPA proceedings to consider whether any route closures in the GSENM Resource Management Plan would disproportionately harm disabled users' ability to access public lands.	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Executive orders	The Executive Order on Advancing Equity also recognizes that poverty and inequality can lead to systematic discrimination against historically underserved and marginalized communities.	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Executive orders	Motorized access provides the best opportunities for those with disability access issues and the RMP is the best resource for the BLM to comply with the Equity Action Plan.	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Executive orders	Since the elimination of motorized access from the planning area would prevent disabled tribal members from accessing sacred and cultural sites, motorized restrictions would likely be contrary to EO 13007, EO 13985, and AIRFA.	GSENM Resource Management Plan Scoping.docx-2.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
McKay	Patrick	Colorado Offroad Trail Defenders	Executive orders	<p>On his first day in office, President Joe Biden issued an "Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government." This executive order established "an ambitious whole-of-government equity agenda" which focuses on addressing "entrenched disparities in our laws and public policies," and mandates a "comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality." In the fall of 2021, the Department of Interior subsequently published a notice in the Federal Register seeking comments on how to provide more equitable access to public lands, which it has identified as an important goal of this administration. Under this executive order, "The term 'equity' means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as ... persons with disabilities...." Historically, there has been no group more greatly marginalized and excluded by public land management policies, and motorized travel management policies in particular, than people with disabilities. Outdoor enthusiasts with ambulatory disabilities frequently rely on motorized travel as their sole means to enjoy recreating on public lands. Not everyone has the ability to hike into a remote wilderness area, but many such people are still able to drive Jeeps, side-by-sides, and ATVs, which are restricted to the designated motorized route network. Travel management policies focused on "minimizing" the environmental impacts of motorized recreation have resulted in a dramatic decrease in motorized recreation opportunities on public lands over the last 20 years which has disproportionately impacted people with disabilities. Wilderness focused environmental groups with extreme ableist biases have pushed for more and more areas to be closed to motorized recreation and reserved exclusively for hikers, mountain bikers, and other "human powered" and "quiet use" forms of recreation in which many people with disabilities are unable to participate. Every time motorized routes are closed, people with disabilities that require the use of motorized means to access public lands are barred from those areas forever. There has been little recourse for such people in the past because the Americans With Disabilities Act does not require public land management agencies to consider disproportionate effects on the disabled community, but only requires that they be given access to public lands on equal terms with everyone else. As a result, the BLM has historically failed to give any real consideration to the impacts of motorized route closures on the disabled community when developing travel management plans. The Biden Administration's focus on equity, however, changes the equation. While the ADA focuses only on equality of opportunity, equity inherently focuses on equality of outcome. Any policy that is facially neutral but disproportionately harms a disadvantaged or marginalized group is considered inequitable. The BLM is therefore required by this executive order and others mandating that federal agencies consider "environmental justice" in NEPA proceedings to consider whether any new or past route closures in the Grand Staircase Escalante National Monument disproportionately harm disabled users' ability to access public lands. It is imperative that the BLM consider the access needs of disabled users in its new management plan for the Grand Staircase Escalante National Monument and ensure that people with disabilities who depend on motorized means do not lose access. Such consideration is also required by the BLM's recently adopted Equity Action Plan that was released by the Department of Interior in April 2022. The Equity Action Plan recognizes that off-road routes create a form of access to public land for those with disabilities, and specifically identifies limited physical access as a barrier that prevents people with disabilities from recreating on public lands. Any approach to travel management that presumes the superiority of non-motorized forms of recreation like hiking over motorized recreation, or that justifies closing motorized routes on the basis that people can still hike on those routes, is inherently discriminatory toward people with disabilities. Any large-scale closures of existing routes would unfairly and inequitably deprive people with disabilities of the ability to recreate in the area using the only means available to them. It is inevitable that such closures would disproportionately impact people with disabilities, who would now have no practical way to visit these areas. Where before they could easily visit these places in a Jeep or side-by-side, not even the most robust electric wheelchair is capable of driving a 10 mile long closed Jeep trail even if it were allowed to. Limiting the areas motorized vehicles can access limits those users who want to experience public land and contradicts the agency's Equity Action Plan. Therefore, BLM should analyze whether each of the proposed alternatives are consistent with the objectives of the Equity Action Plan and whether each provides sufficient motorized access to monument attractions. We submit that keeping the V-Road and Inchworm Arch road open to motorized use, and considering reopening additional roads like the Paria River road and the Grand Bench Neck road would be the best way to ensure the new management plan complies with the DOI Equity Action Plan, and we strongly urge the BLM to include each of these actions in the alternatives considered in this planning process. Thank you for your consideration.</p>	Grand Staircase Escalante Scoping Comment .pdf
Berry	Scott	Grand Staircase Escalante Partners	Executive orders	<p>In the Summary section of the document, the first paragraph of the NOI lists the statutory and legal direction for issuing the NOI, and for the planning process in general. However, the list omits any reference to the Omnibus Public Land Management Act of 2009 (16 U.S.C 7202), establishing the National Landscape Conservation Lands System. Proclamation 10286 specifically directs that the monument shall be managed, "as a unit of the National Landscape Conservation System.." This omission was probably the result of simple clerical error. However, correcting the omission at this early stage will help ensure that the omission is not repeated at future stages of the planning process.</p>	Gmail - Request for Corrections to the GSENM Notice of Intent.pdf
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Executive orders	<p>We support GSENM's interest in developing and maintaining strong relationships with tribal nations consistent with Secretarial Order 3043. In structuring the co-stewardship program, we suggest the following: * Adaption of the Bears Ears model where appropriate. * Consideration of the United Nations Declaration on the Rights of Indigenous Peoples especially Article 19 that requires the free, prior, and informed consent of projects that impact Indigenous Peoples. Other applicable articles include: 11, 12, 25, and 26. * Exploring funding and resources to support co-stewardship programs. With all of the new consultation responsibilities that Navajo must participate in, our capacities are already strained, so further engagement must be supported through grants, agreements, contracts, etc. This should include both management and science program participation.</p>	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
McCoy	Melissa	U.S. EPA Region 8	Executive orders	Executive Order 13007 Executive Order 13007, "Indian Sacred Sites" (May 24, 1996), requires federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian religious practitioners, and to avoid adversely affecting the physical integrity, accessibility, or use of sacred sites. It is important to note that a sacred site may not meet NRHP criteria for a historic property and that, conversely, a historic property may not meet the criteria for a sacred site. It is also important to note that sacred sites may not be identified solely in consulting with tribes located within geographic proximity of the planning area. Tribes located outside the direct area of impact may also have religiously significant ties to lands within the planning area and should be included in the consultation process. In the Draft EIS, we recommend addressing the existence of Indian sacred sites in the planning area that may be considered spiritual sites by regional tribal nations. Discuss how BLM would ensure that the proposed action would avoid or mitigate for the impacts to the physical integrity, accessibility, or use of sacred sites.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	State laws/regulations	The State has sovereign and quasi-sovereign authority to protect and manage all wildlife within its borders, including on federal land,(113) and as such, the State retains jurisdiction over wildlife within the boundaries of the GSENM. It holds title to all wildlife within its borders not held privately or otherwise legally acquired by another entity.(114) Utah law requires the State's wildlife agency to "protect, propagate, manage, conserve, and distribute protected wildlife" throughout Utah.(115) The ability to properly manage wildlife and protect the State's sovereign interests require access by vehicles and equipment to protect, conserve, and manage the wildlife.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	State laws/regulations	When the GSENM was first designated in 1996 there were no state or local plans with which to ensure consistency. However, as of 2018, the State of Utah(17) has adopted a State Resource Management Plan ("SRMP") and all twenty-nine (29) counties in the State have adopted County Resource Management Plans ("CRMPs").(18) Both counties affected by the GSENM, namely the Counties of Garfield(19) and Kane(20), have both adopted CRMPs. The effort to adopt the SRMP and CRMPs "was a first-of-its-kind effort not only in Utah, but nationwide. The state and the counties frequently use their plans to coordinate management actions with the Bureau of Land Management and U.S. Forest Service."(21) All these plans include locally adopted objectives and policies for many aspects of not only federal land management but also include findings, provisions, and policy relating to natural resource development and environmental quality relevant to the current planning process. (17) Utah State Resource Management Plan ("Utah SRMP"), pp. 1, available at: <a href="https://rmp.utah.gov/state-of-utah-resource-management-plan/">https://rmp.utah.gov/state-of-utah-resource-management-plan/</a> (2018). (18) PLPCO, Resource Management Plans by County, Utah's Public Lands Policy Coordinating Office, available at: <a href="https://rmp.utah.gov/county-resource-plans/">https://rmp.utah.gov/county-resource-plans/</a> (2021). (19) Garfield County Resource Management Plan, available at: <a href="https://rmp.utah.gov/garfield-county/">https://rmp.utah.gov/garfield-county/</a> (2017). (20) Kane County Resource Management Plan, available at: <a href="https://rmp.utah.gov/kane-county/">https://rmp.utah.gov/kane-county/</a> (2017). (21) PLPCO, Resource Management Plans, Utah's Public Lands Policy Coordinating Office, available at: <a href="https://publiclands.utah.gov/current-projects/resource-management-plans/">https://publiclands.utah.gov/current-projects/resource-management-plans/</a> (2021).	GSENM RMP Scoping Comments 27SEPT2022.pdf
Anon	Anon	Garfield County	Local laws/regulations	When creating Land Use Plans or Resource Management Plans, BLM and USFS are required to coordinate their plans with State and Local Government plans. Coordination is a separate process from Cooperation and must occur regardless of whether State or Local Governments were designated Cooperating Agencies. Agencies must make efforts to draft Federal Plans that coordinate with State and Local Plans.	N/A
Berry	Scott	Grand Staircase Escalante Partners	Proclamations 10286 & 6920	At several points in the NOI reference is made to management under the traditional principles of multiple use and sustained yield. For example, in the NOI section titled, Nature of the Decision To Be Made, the decision is described as a selection of land planning decisions for managing BLM-administered lands under the principles of multiple use and sustained yield in a manner that best addresses the purpose and need. Another example is found in Paragraph 7 of the Purpose and Need section, which invokes multiple use as the context for the planning process. Unfortunately, the invocations of "multiple use" are incomplete and potentially misleading, because they do not reference to Section 302 of the Federal Land and Policy Management Act (FLPMA), which establishes an exception to the general multiple use / sustained yield mandate where a tract of such public land has been dedicated to specific uses according to any other provision of law. This exception to the general multiple use / sustained yield mandate certainly applies to lands of GSENM, which have been dedicated to meeting the objectives set out in Proclamation 10286. The application of this exception to GSENM was emphasized in the guidelines issued by the Director of the BLM for the Interim Management of GSENM (Dec. 16, 2021), which states, "typical multiple use management is superseded by the direction in Proclamation 10286 to protect monument objects." Where the language traditional "multiple use / sustained yield" mandate is referred to in the NOI, those reference should be clarified to reflect that the mandate has been superseded by Proclamation 10286, and has application only when it is established that other proposed uses will not result in harm to the objects and values described at length in the Proclamation.	Gmail - Request for Corrections to the GSENM Notice of Intent.pdf
Shu	Lyn	Highway 84 LLC	Proclamations 10286 & 6920	We support the local Garfield, Kane and San Juan County governments who have endorsed the Utah State Representatives in opposing this action. Other than to reverse every decision Former President Trump implemented, there is no good reason for President Biden's Proclamation. It adds headaches to administration, recreational traffic without infrastructure, and another costly study! Under the category 'Purpose and Need,' I. The words protect and restore... "Impenetrable landscapes," is contrary to the goal of opening more land for recreation.	N/A
Sjogren	Morgan	N/A	Proclamations 10286 & 6920	Prioritize Protection of Monument Objects Declared in Proclamation 10286 Proclamation 10286 is written to ensure that GSENM is managed to protect and preserve monument objects first and foremost, making multi-use management secondary. Any multi-use management objectives that harm or counteract efforts to protect the monument's natural, cultural, historic, and scientific values violates Proclamation 10286. Grand Staircase-Escalante National Monument is not to be managed for multi-use, but for compatible use in order to protect monument objects.	40 Mile Gulch _ June 2018.pdf
Spotts	Richard	N/A	Proclamations 10286 & 6920	There is a potential linkage between this issue and the need in the new RMP to identify areas that are open, closed, or limited for the designation of routes. OHV recreation is increasing in popularity, and it has already caused serious environmental impacts in some areas. BLM often keeps areas "limited" in RMPs because ranchers want to access and use routes in remote areas to maintain range improvements. These routes are then available for OHV recreation, and illegal route proliferation may occur in these remote areas. However, if BLM properly retires these remote grazing allotments, the need for ongoing maintenance would become moot and BLM could then consider putting these areas as closed in the new RMP. In terms of routes and the new RMP, there should obviously not be any "open" area designations because that would jeopardize monument objects in violation of Proclamation 10286. So the RMP level process actually decides which areas are "closed" (where routes in those areas would be promptly blocked off and reclaimed) versus those in "limited" areas that would be subject to a subsequent Travel Management Plan (TMP) route designation process. During that subsequent TMP process, BLM must apply the required minimization criteria to protect resources and, for the GSENM, criteria should be added to protect monument objects and values.	Million Cattle Graze on Federal Land for Almost Nothing.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Veranth	John	N/A	Proclamations 10286 & 6920	Recreation is a valid and important aspect of the national monument management. The 1996 Proclamation states "The monument presents exemplary opportunities for geologists, paleontologists, archeologists, historians, and biologists." Implicitly this statement includes not only the professionals, but also both amateur scientists and passive viewers of resources and features interpreted by others.	Veranth Scoping 926.pdf
Lish	Christopher	N/A	Proclamations 10286 & 6920	Please prioritize conservation and biodiversity protection to protect the objects of historic and scientific interest as detailed in President Biden's October 2021.	220926_doi-blm-ut-p010-2022-0006-rmp-eis_grand_staircase-escalante.pdf
Sorenson	Craig	N/A	Proclamations 10286 & 6920	The Grand Staircase Escalante National Monument boundaries were ratified by Congress after Monument designation in 1996 by approving minor boundary adjustments involving all four corners of the Monument and Congressional approval of a land exchange with the state of Utah adding 176,600 acres of land, as well as approximately 24,165 acres of mineral interests, within the exterior boundaries of the GSENM in exchange for other lands and \$50 million dollars. The state of Utah is wasting tax payers dollars contesting the GSENM when the majority of Utah support both Grand Staircase Escalante and Bears Ears National Monuments and National approval of Monuments is overwhelming.	GSENM Management Plan Comments.pdf
Hartman	Bob	N/A	Proclamations 10286 & 6920	The management plan should be based on the language in the presidential proclamation.	N/A
Not Provided	A Utah resident	N/A	Proclamations 10286 & 6920	The past usually informs the future. In this case, thus far, how has BLM managed the GSENM differently than other non monument BLM lands in Utah? How can BLM demonstrate how well it has protected GSENM objects and values? What scientific data does BLM have relating to the current status and trend of GSENM objects and values? How will such data be used in developing the new GSENM RMP? BLM should answer these basic questions to provide the proper public informational foundation before the RMP planning further proceeds.	N/A
Not Provided	Not Provided	N/A	Proclamations 10286 & 6920	BLM has improperly managed GSENM primarily for multiple uses like cattle grazing and OHV recreation instead of for the required protection of monument objects and values.	N/A
MacNulty	Cory	National Parks Conservation Association	Proclamations 10286 & 6920	We value the connected landscape and the historic, prehistoric and scientific objects, and recreation opportunities within the entire monument designated under Presidential Proclamations 10286 and 6920.	N/A
John	Brandi	N/A	Federal plans, policies, and programs	In April of 2022 the Department of Interior released it's Equity Action Plan which addresses the lack of access on public lands. Recreation, primarily motorized recreation has taken a backseat to conservation and protection. Motorized recreation is often the only way those with mobility impairment disabilities are able to access public lands. Current policies actively discriminate against this group of underserved Americans, and I would like to see BLM help connect all users with public lands. BLM should ensure that the plan complies with the Department of Interior's Equity Action Plan, which recognizes that restrictions on motorized access to public land create barriers of access to those with disabilities.	N/A
Trimble	Stephen	N/A	Federal plans, policies, and programs	The 2000 resource management plan for the original Clinton-designated monument worked well for years-and appropriately emphasized the conservation of monument objects and values. I urge you to begin your work with this plan as a template-and update and add to it where needed. The more recent plan, written during the Trump reduction years, does the opposite- favoring resource consumption over protection of monument values and giving too much authority to local elected officials over these NATIONAL Conservation Lands. The Trump-era plan contradicts the current Biden proclamation and should be scrapped.	GSE RMP comments 9-2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	State plans, policies, and programs	12.5. Utah State Code As analyzed extensively above, the BLM remains bound by FLPMA's coordination and consistency requirements as it relates to local and state plans/law. In addition to federal law prohibiting the retirement of grazing allotments and/or permits, Utah law contains similar prohibitions. Specifically, Utah Code 63-J, Chapter 8,(75) outlines the Utah SRMP for Federal Lands. Particular sections of interest and importance for grazing leases also include Sections 103,(76) 104,(77) and 105.8.(78) Additionally, 63L-11-3-302(79) outlines "Principles to be recognized and promoted" by the State Planning Coordinator. (75) <a href="https://le.utah.gov/xcode/Title63J/Chapter8/63J-8-S103.html?v=C63J-8-S103_1800010118000101">https://le.utah.gov/xcode/Title63J/Chapter8/63J-8-S103.html?v=C63J-8-S103_1800010118000101</a> (77) <a href="https://le.utah.gov/xcode/Title63J/Chapter8/63J-8-S104.html?v=C63J-8-S104_2021050520210701">https://le.utah.gov/xcode/Title63J/Chapter8/63J-8-S104.html?v=C63J-8-S104_2021050520210701</a> (78) <a href="https://le.utah.gov/xcode/Title63J/Chapter8/63J-8-S105.8.html?v=C63J-8-S105.8_2021050520210701">https://le.utah.gov/xcode/Title63J/Chapter8/63J-8-S105.8.html?v=C63J-8-S105.8_2021050520210701</a> (79) <a href="https://le.utah.gov/xcode/Title63L/Chapter11/63L-11-S302.html?v=C63L-11-S302_2021050520210701#63L-11-302(13)">https://le.utah.gov/xcode/Title63L/Chapter11/63L-11-S302.html?v=C63L-11-S302_2021050520210701#63L-11-302(13)</a> The consistency and coordination requirements would also apply to the policies and objectives adopted by both Kane and Garfield Counties, both of which have adopted extensive grazing related policies.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	State plans, policies, and programs	4. Wildfire and Fuels Management, and Forestry and Woodland Products The Utah SRMP contains numerous provisions relating to responsible woodland and forestry practices. For example, the SRMP states that "it is the State's position that public lands be managed for multiple uses, sustained yields, prevention of waste of natural resources, and to protect the health, safety and welfare of the public." This is just one example of the SRMP's dealings with proper forestry practices. Here, multiple uses and sustained yields includes using federal lands managed by the USFS for multiple products, including livestock grazing and timber products.	GSENM RMP Scoping Comments 27SEPT2022.pdf



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Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	State plans, policies, and programs	As part of the current GSENM RMP planning process, the DOI and BLM released an Analysis of the Management Situation ("AMS"). Section 3.3 of the AMS lists relevant State and Local Plans, Policies, and Programs. Due to the coordination and consistency requirements discussed above, the BLM should include the Utah SRMP(22) in Section 3.3, as it contains state policies with regard to federally owned lands and designated monuments. The AMS also references Utah code title 63 Chapter 8 when it should be title 63J. while this chapter does establish Utah Grazing Agricultura Commodity Zones it also expresses the State's position that BLM land-use plans should: (22) <a href="https://storymaps.arcgis.com/collections/81d4406668e34acca4d98275ee41cd07">https://storymaps.arcgis.com/collections/81d4406668e34acca4d98275ee41cd07</a> - support valid existing transportation, mineral, and grazing privileges on federal land at the highest reasonably sustainable levels; - produce and maintain the desired vegetation for watersheds, timber, food, fiber, livestock forage, wildlife storage and minerals that are necessary to meet present needs and future economic growth; - meet the needs of wildlife; - achieve and maintain at the highest reasonably sustainable levels a continuing yield of energy, hard rock, and nuclear resources; - achieve and maintain livestock grazing in the subject lands at the highest reasonably sustainable levels; - manage the watershed in the subject lands to achieve and maintain water resources at the highest reasonably sustainable levels; - keep open to motorized travel, any road in the subject lands that is part of the respective counties' duly adopted transportation plan; and - manage the subject lands so as to not interfere with the property rights of private landowners. Again, while not a direct response to the current Scoping Document, the State now specifically requests that under the Coordination and Consistency requirements discussed above, that any and all land-use actions that occur on federally managed land as a result of the GSENM RMP planning efforts be consistent with the Utah SRMP, the Utah CRMPs, and the Utah Code sections, including but not limited to, those cited above.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	State plans, policies, and programs	Specifically, the SRMP states that: "The BLM and Forest Service land use plans should produce planning documents consistent with state and local land use plans to the maximum extent consistent with federal law and FLPMA's purposes, by incorporating the state's land use planning and management program for the subject lands that preserve traditional multiple use and sustained yield management on the subject lands to:... a. Achieve and maintain in perpetuity a high-level annual or regular periodic output of agricultural, mineral, and various other resources from the subject lands; b. Support valid existing transportation, mineral, and grazing privileges in the subject lands at the highest reasonably sustainable levels; c. Produce and maintain the desired vegetation for watersheds, timber, food, fiber, livestock forage, wildlife forage, and minerals that are necessary to meet present needs and future economic growth and community expansion in each county where the subject lands are situated without permanent impairment of the productivity of the land;(emphasis added)."35 (35) State of Utah Resource Management Plan at 10; citing Utah State Code Annotated § 63J-8-104(a)-(c).	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	State plans, policies, and programs	The Utah SRMP, recognizes and supports the responsible use of the public land for livestock grazing as an integral part of Utah's agricultural economy.(57) With urbanization continually swallowing available agricultural land within the state, livestock grazing on federally administered lands becomes even more important to agriculture in Utah. Of the 45 million acres of grazing lands within the Utah, 73 percent is federally owned, 9 percent is state-owned, and 18 percent is privately owned. Of the federal land that permits grazing, 67 percent is managed by the BLM."(58) In short, the BLM plays an oversized role in ensuring the continued success of livestock grazing in Utah. However, the State is concerned given the fact that in Utah, "grazing has declined on BLM lands by more than 66 percent"(59) over the course of the past century. While maintaining livestock numbers and Animal Unit Months ("AUMs") at a level consistent with the range's carrying capacity is a worthy goal, past experience shows that temporary reductions in AUMs have a way of becoming permanent reductions. (57) Utah SRMP at 22-24. (58) Id. at 22. (59) Id. As such, the State has adopted a "no-net-loss" policy regarding livestock AUMs on federal grazing allotments.(60) Here, "No Net Loss" means, "AUMs within the state remain at or above current levels unless a scientific need for temporary reduction is demonstrated to the satisfaction of state officials...in the case that AUMs are temporarily reduced, these reductions are reinstated at the earliest possible moment once vegetative health has been restored to its previous levels.(61) while it is certainly necessary to temporarily reduce AUMs in certain situations, such as during extreme drought, it is imperative that temporary reductions do not become permanent (such as through permit retirement). As such, "the State does not support the permanent retirement of any grazing allotment"(62) and "the state opposes the relinquishment or retirement of grazing animal unit months in favor of conservation, wildlife, and other uses."(63) (emphasis added). (60) Id. at 149. (61) Id. (62) Id. at 150 (63) Utah Code § 63J-4-401-m(ii).	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	State plans, policies, and programs	Hydrology (Groundwater, Surface Water, Wetlands, Riparian Areas, Floodplains, and Water Quality) The State's positions on hydrology, including water rights and water quality, are made abundantly clear in its Utah SRMP. The State would encourage the BLM to refer to the Utah SRMP for consistency purposes as it analyzes hydrology on the GSENM.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	State plans, policies, and programs	The DWR would recommend incorporating important guiding management plans into the GSENM RMP. Examples of some of the major DWR management documents are: - Utah's Wildlife Action Plan 2015-2025; - Paunsaugunt Deer Herd Unit #27 Management Plan 2020; - Paunsaugunt Elk Herd Unit #27 Management Plan 2016; - Utah Pronghorn Statewide Management Plan; - Conservation and Management Plan for Three Fish Species in Utah Addressing needs for Roundtail Chub ( <i>Gila robusta</i> ), Bluehead Sucker ( <i>Catostomus discobolus</i> ), and Flannelmouth Sucker ( <i>Catostomus latipinnis</i> ); and the - Utah Greater Sage-grouse Management plan. These plans should be referenced in the GSENM RMP, where applicable.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Cutler	Clayton	Kane County Utah	Local plans, policies, and programs	Because so much of the County's land base is designated as part of the GSENM, Kane County's RMP has extensive findings and policy positions on the monument designation. The ever changing management plans have a tremendous effect on Kane County. A portion of Kane's RMP reads as follows: "The monument contains a large amount of Kane County's natural resources from grazable pasture to mineral reserves. But as the monument designation, its uses have been restricted, which has stifled economic growth throughout the county. Past Federal land management practices have eroded the ability to make a living through cattle ranching without regard for history, culture and economics. Large swathes of coal reserves in the Kaiparowits Plateau have been untouchable because monument designation restricted access."3 3 Kane County Resource Management Plan p. 56.	Scoping Letter GSENM -signed.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Cutler	Clayton	Kane County Utah	Local plans, policies, and programs	<p>Rangeland Health and Livestock Grazing Management: During the September 15, 2022 cooperating agency meeting held in Kanab, one specific question was highlighted and reads as follows: "How will the BLM manage retirement of grazing permits and leases, as provided for under Proclamation 10286?"</p> <p>5<a href="https://eplanning.blm.gov/public_projects/2020343/200528424/20066577/250072759/Analysis%20of%20the%20Management%20Situation_508.pdf">https://eplanning.blm.gov/public_projects/2020343/200528424/20066577/250072759/Analysis%20of%20the%20Management%20Situation_508.pdf</a> f The question is in reference to one key phrase that is of particular concern in Proclamation 102866 which states: "The Secretary shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above ... Should grazing permits or leases be voluntarily relinquished by existing holders, the Secretary shall retire from livestock grazing the lands covered by such permits or leases pursuant to the processes of applicable law. Forage shall not be reallocated for livestock grazing purposes unless the Secretary specifically finds that such reallocation will advance the purposes of this proclamation....7" 6 Presidential Proclamation 10286 of October 8, 2021, Grand Staircase-Escalante National Monument, 86 FR 57335, available at: <a href="https://www.federalregister.gov/documents/2021/10/15/2021-22673/grand-staircase-escalante-national-monument">https://www.federalregister.gov/documents/2021/10/15/2021-22673/grand-staircase-escalante-national-monument</a>. 7 Grand Staircase Proclamation at 57346; see also Bears Ears Proclamation at 57332-33 (Note that the language is slightly different in the two proclamations. Where the Bears Ears Proclamation references "Secretaries" the Grand Staircase Proclamation only states "Secretary", as Bears Ears National Monument is co-managed by both the Bureau of Land Management and the U.S. Forest Service, while the Grand Staircase-Escalante National Monument is managed solely by the Bureau of Land Management). This language referenced in proclamation 10286 directly conflicts with Kane County's Enhanced Grazing Plan outlined in the County's RMP. Additionally Utah State Law incorporated in Kane County's RMP is summarized as follows: "Federal land management agencies will not adjust AUMs on public lands, without demonstrated scientifically based justification and full consultation between the permittee and the administering agency. Federal management agencies will not permit the relinquishment, transfer, or retirement of livestock grazing AUMs in favor of conservation, wildlife, or other uses besides livestock grazing."8 8 Kane County Resource Management Plan, p. 89, 94. "The state opposes the relinquishment or retirement of grazing animal unit months [AUMs] in favor of conservation, wildlife and other uses," "the state opposes the transfer of grazing animal unit months to wildlife for supposed reasons of rangeland health," and "reductions in domestic livestock animal unit months must be temporary and scientifically based on rangeland conditions;"9 9 Utah Code, 63j-4-401(6)(m)(ii)(iv)and(v). Kane County Resource Management Plan p. 73.</p>	Scoping Letter GSENM -signed.pdf
Cutler	Clayton	Kane County Utah	Local plans, policies, and programs	<p>The economy of Kane County relies heavily on the proper management of the lands contained therein. 87% of all land in the county is federally controlled, and the GSENM takes up 49% of the county's total acreage. With that amount of land designated as a monument, it is crucial that the BLM develop a management plan that is consistent with Kane County's Resource Management Plan (RMP) to the maximum extent allowable by law. It is the policy of Kane County that federal and state land management agencies "Implement federal land management programs and activities consistent with the County's ordinances, and respect the County's rights in fulfilling the Federal Government's legally mandated coordination responsibility."2 1 Presidential Proclamation 10286 of October 8, 2021, Grand Staircase-Escalante National Monument, 86 FR 57335, available at: <a href="https://www.federalregister.gov/documents/2021/10/15/2021-22673/grand-staircase-escalante-national-monument">https://www.federalregister.gov/documents/2021/10/15/2021-22673/grand-staircase-escalante-national-monument</a>. 2 Kane County Resource Management Plan p. 252</p>	Scoping Letter GSENM -signed.pdf
C	Peter	N/A	Local plans, policies, and programs	<p>-To protect Monument objects and values, BLM must prohibit mechanical treatments of sagebrush, pinyon pine and juniper, and other vegetation. NO chaining, mastication, harrowing, and other heavy-machinery removal methods that, as recognized in the original Monument Management Plan, have so much potential to harm monument objects. For this same reason, BLM must only use native species when restoring and reseeding areas within the Monument, including after wildfire.</p>	N/A
Weppner	William	N/A	Local plans, policies, and programs	<p>8. My last comment is broader and relates to the entire GSENM. In the 26 year history of the GSENM, there have been multiple dozens of individuals who have either died or sustained serious injuries on this specific national monument, resulting in the direct involvement of Garfield County and Kane County volunteer first responders (Volunteer Fire &amp; Rescue Departments, Volunteer Search &amp; Rescue, and Volunteer EMTs) Add to that number the additional numbers of people who became lost and disoriented requiring the same volunteer resources to bring them to safety. -These first responders suffer an economic loss for their volunteer efforts by leaving their jobs when paged, and lose personal time with their family. -They suffer emotionally when searching for and recovering dead bodies, or rescuing seriously injured people. -Local first responders put their own safety and security at risk and sacrifice personal property during these rescues/recoveries (vehicles, horses, and equipment). -Local city and county emergency vehicles (fire &amp; rescue trucks and ambulances) are subjected to significant abuse and deterioration at the expense of local taxpayers. -The GSENM/BLM management has failed to coordinate and cooperate with local first responder organizations in any significant or sustainable way. -The GSENM/BLM management has been derelict in their "duty to warn" the public of risks and dangers associated with the GSENM - a standard that every private entity in this country is required to meet.</p>	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Local plans, policies, and programs	<p>Further, the State opposes the implementation of the Grazing Retirement Clause as found in the GSENM Proclamation, as it defeats the proper role of livestock grazing and (as extensively shown infra) is inconsistent with the state and local planning documents.</p>	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Local plans, policies, and programs	<p>1. Utah State Resource Management Plan(139) 2. Kane County Resource Management Plan(140) 3. Garfield County Resource Management Plan(141) 4. Kane County Enhanced Grazing Plan(142)</p>	GSENM RMP Scoping Comments 27SEPT2022.pdf

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Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Local plans, policies, and programs	Based on these findings, Kane County has adopted the following policy: "Kane County insists the practice of grassbanks or "reserves" be discontinued; any allotment that becomes vacant must be offered to other permittees and whoever obtains a grazing permit shall be required to run a reasonable number of livestock on it, unless there are reasonable and documented resource concerns or personal issues that require a temporary reduction."(90) (90) Id. at 103. In short, ranching and livestock grazing play a large role in Kane County's heritage, culture, and economic framework, as is made apparent throughout the Kane CRMP, and as evidenced by the policies adopted therein, including the Kane County Enhanced Grazing Plan. The policies adopted in the Kane CRMP make clear that Kane County adamantly opposes the relinquishment or retirement of grazing privileges and AUMs as is allowed for in the Grazing Retirement Clause. Again, the State's outright opposition (incorporated by the Kane CRMP) to retirement of grazing AUMs is in direct opposition to the Proclamations, and the State again requests that the Grazing Retirement Clause be revisited as to provide consistency with the State Code, State RMP, Kane CRMP and Kane County Enhanced Grazing Plan.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Local plans, policies, and programs	Garfield and Kane Counties make up the entirety of the land included in the Proclamation, and so the public lands within these counties are very important pieces of the counties' overall land use planning and are vital pieces of their economies. Consequently, in addition to the State's "no-net-loss" policy, both counties have adopted similar policies as they pertain to the Grazing Retirement Clause, as discussed below. Suffice it to say, that on the note of the socio-economic impacts of grazing, that if the current Environmental Impact Statement (EIS) and RMP planning process is going to result in a livestock management plan, then the impacts of livestock grazing on the local communities' economies must be thoroughly acknowledged and evaluated in the EIS.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Local plans, policies, and programs	In an effort to keep its ranching and livestock grazing industry "healthy and viable," Kane County "has developed its own Enhanced Grazing Plan for the GSENM because [Kane County] recognizes those who work with the land are the best stewards for it. This industry has served to protect the landscape for over 150 years and when allowed to do what's right; when allowed to make improvements, develop water features, repair roads, fences, troughs, and respond to the land as they instinctively know how, the results become self-evident. Allowing active management by land stewards who have feet on the ground will create improved results because they have a vested interest in keeping the [Grand Staircase-Escalante National Monument] healthy and productive."(85) (85) Id. at 91. The Kane County Enhanced Grazing Plan (as contained in the Kane CRMP), can be summarized as follows: "Overall, livestock grazing on federal and state lands in the county shall continue at levels consistent with the custom and culture, and proper stewardship of the resource. The continued viability of livestock operations within the county shall be achieved by management of land and forage resources, by proper optimization of AUMs for livestock (in forage resources), in accordance with supportable science and the multiple-use provisions of federal and state law. Federal land management agencies will not adjust AUMs on public lands, without demonstrated scientifically based justification and full consultation between the permittee and the administering agency. Federal management agencies will not permit the relinquishment, transfer, or retirement of livestock grazing AUMs in favor of conservation, wildlife, or other uses besides livestock grazing. Federal and state land managers will promote public respect for private structures, corrals, fences, water development, etc., on federal land in an effort to reduce vandalism, educate land users, and promote multiple-use concepts. AUMs should not be placed in a suspended use category without a demonstrated rationale and scientific determination that the condition of the rangeland allotment or district in question will not sustain the AUMs proposed. Any grazing AUMs that are placed in a suspended use category must be returned to active use when range conditions improve. State-of-the-art monitoring data should be the basis for grazing management decisions on grazing allotments."(86) (emphasis added). (86) Id. at 96-97. Again, as stated in the Kane County Enhanced Grazing Plan, as contained in the Kane CRMP, it is Kane County's position that "federal management agencies will not permit the relinquishment, transfer, or retirement of livestock grazing AUMs in favor of conservation, wildlife, or other uses besides livestock grazing."(87) This policy contained in the Kane CRMP is in direct conflict with the Grazing Retirement Clause found in both Proclamations. Under the Coordination and Consistency Requirements imposed by both FLPMA and NFMA (as analyzed in Section II herein), the State would again request that the Grazing Retirement Clause be revisited and removed to remain consistent with State code, the Utah SRMP, the Kane CRMP and Kane County Enhanced Grazing Plan which prohibits the relinquishment or retirement of livestock grazing AUMs. (87) Id. In further support of its rich ranching/cowboy culture and heritage, the Kane CRMP has adopted other policies that apply to the Grazing Retirement Clause. For example, the Kane CRMP incorporates Utah State law, specifically Utah Code, 63J-4-401(6)(m)(ii)(iv) and (v) which says, "the state opposes the relinquishment or retirement of grazing animal unit months [AUMs] in favor of conservation, wildlife and other uses;" "the state opposes the transfer of grazing animal unit months to wildlife for supposed reasons of rangeland health," and "reductions in domestic livestock animal unit months must be temporary and scientifically based on rangeland conditions;"(88) Again, the State's outright opposition (incorporated by the Kane CRMP) to retirement of grazing AUMs is in direct opposition to the Proclamations. (88) Id. at 75-76. Relatedly, the Kane CRMP also addresses closing grazing allotments or converting allotments to "grassbanks." Specifically, the Kane CRMP states "grazing allotments on the Monument should not be closed or converted to grassbanks when they are voluntarily released by permittees for whatever reason. Any allotment that becomes vacant should be offered to other permittees unless there are compelling and documented reasons for leaving the allotment vacant. Whoever obtains a grazing permit should be required to run a reasonable number of livestock on it, unless there are reasonable and documented resource concerns or personal issues that require a temporary reduction."	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Local plans, policies, and programs	The county proposed plan to chip seal HTR road should be analyzed as part of this resource management plan. The urgency is such that waiting several years for implementational planning to occur is not a reality.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Popejoy	Mike	Grand Canyon Trust	Groundwater	Goal I Ensure that groundwater pumping is not damaging Monument objects including aquatic, wetland and terrestrial organisms. Objectives - Assess the impacts of groundwater pumping on springs, streams and wetland ecosystems.	Appendix D - Alternative Components.pdf
McCoy	Melissa	U.S. EPA Region 8	Effects Analysis	The evaluation should focus on resources of concern or resources that are "at risk" and/or may be significantly impacted by the proposed planning and management activities before mitigation.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	.The agency should provide full and adequate disclosure of the cumulative effects of all motorized closures on the public so that the decision does not marginalize motorized recreational opportunities.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	Adequately Consider and Disclose the Cumulative Impact of All Motorized Closures	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	The Agency must adequately evaluate and disclose significant cumulative effects that their management decisions have created.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	The agency should adequately consider that a sense of magnitude should be used to identify the significant cumulative impact that motorized recreationists have experienced over the past 40 years.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	The agency should adequately consider that agency actions and mining claims are closing much needed dispersed camp spots during a pandemic when the public needs more dispersed camp sites.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	The agency should adequately consider that all of the defacto motorized closures that have resulted from wildfires have a significant impact on the public's opportunity to enjoy motorized access and motorized recreation.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	The agency should adequately consider that development of mining claims and other private lands has had a significant cumulative impact on public access to dispersed camp sites and routes.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	The agency should adequately consider that it uses every opportunity to close dispersed camp sites, motorized spur routes, and motorized roads and trails and has not adequately evaluated and considered the cumulative impact of that trend on the human environment.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	The agency should adequately consider that motorized closures since 1985 meet the NEPA and CEQ test for significance with respect to cumulative effects and cumulative effects should be adequately considered in the analysis.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	The agency should adequately consider that public access to public lands and the use of public lands have declined dramatically over the past 40 years due to management trends.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	The agency should adequately consider that significant cumulative effects have occurred because motorized recreationists cannot successfully change or challenge the Agency's predisposition to motorized closures.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	The agency should adequately consider that the analysis and decision should consider the massive amount of multiple-use land originally used for beneficial use that has effectively been converted to defacto wilderness and limited or exclusive-use land.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	The agency should adequately consider that the analysis should adequately disclose and evaluate the amount of motorized access and motorized recreation that has been lost to public use since the 1960's.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	The agency should adequately consider that the cumulative effect of this action combined with many other similar motorized closure decisions significantly affects our pursuit of happiness and the quality of the human environment.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	The agency should adequately consider that the public has effectively lost the use of a significant number of trails and routes each year due to inadequate maintenance including diversion of runoff to prevent erosion and blockage from beetle kill downfall, and obliteration from wildfires. a. The cumulative effect of this continual loss has become significant and should be addressed and mitigated.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Cumulative Effects Analysis	The agency should adequately consider, evaluate, and disclose those trends to the public including the significant cumulative impacts of closure and reduced use on the health of the public land and the health of the public including the significant need for motorized access and recreation. a.The health of the human environment must be given a hard look. b.Nothing in NEPA and CEQ guidance says that the health of the natural environment should prevail over the health of the human environment. c.The health of the human environment must be given consideration equal to the natural environment. d.The agency should adequately consider that it has created significant cumulative impacts on the human environment by closing an excessive amount of multiple-use land to motorized access and motorized recreation. e.The agency should adequately consider that motorized recreationists have been hammered by motorized closure after motorized closure in Utah and surrounding states.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Sorenson	Craig	N/A	Cumulative Effects Analysis	- While the focus of the majority of recreation use and facilities is in the front country zone and protecting and minimizing development of less used passage and outback areas, BLM needs to be prudent in how front country use is managed. For example, allowing overflow parking on US Highway 12 is a safety issue and must be curtailed. Expanding parking at the Calf Creek Campground will only degrade the Lower Falls Hiking Trail experience and further impact Monument values where overuse is already an issue. Every place has a carrying capacity and requires use limits. Re-routing the trail upon the bench is unacceptable for the protection of the visual resource of Calf Creek Canyon within the view shed of All American Highway 12 and concern for visitor safety of the campers below the cliff.	GSENM Management Plan Comments.pdf
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Cumulative Effects Analysis	The RMP should also consider the compounding effects of grazing to climate change in rangeland health, water availability/quality, methane emissions, and erosion for example.	N/A
McCoy	Melissa	U.S. EPA Region 8	Cumulative Effects Analysis	In the Draft EIS, we recommend including and describing all connected actions (40 CFR § 1501.9(e)(1)). The Council on Environmental Quality (CEQ) regulations also require analysis of "reasonably foreseeable environmental trends and planned actions in the area(s)" as part of the analysis of the affected environment (40 CFR § 1502.15). Analysis of impacts should consider direct effects, indirect "effects that are later in time or farther removed in distance from the proposed action or alternatives" (40 CFR § 1508.1(g)(2)), and cumulative effects (40 CFR § 1508.1(g)(3)). In the Draft EIS, we recommend describing the threats to resources from all management activities (or lack thereof) as a whole, instead of only from individual management activities. Identify how resources, ecosystems, and communities in the vicinity of the planning area have already been affected by past activities, are being affected by present activities, and may be affected by future activities. The Draft EIS should also consider the combined impacts associated with these past, present, and future activities, with consideration of the resources' responses to change and capacity to withstand stresses.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Direct, Indirect	b.The impact analysis should not assume that one size of impact fits all motorized uses. c.A criteria and impact analysis should be developed that differentiates between different tread widths and level of use including traffic counts.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Action Committee	CTVA	Capital Trail Vehicle Association	Direct, Indirect	The agency should adequately compare impacts from all types of visitors to natural impacts in order to demonstrate a true sense of magnitude for impacts.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Direct, Indirect	The agency should adequately consider that; a.Activities other than OHV recreation have a greater impact on wildlife,	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Murray	Michael B.	Coalition to Protect America's National Parks	Direct, Indirect	We emphasize the critical importance of protecting threatened and endangered species, native cold desert plant and animal communities, streams and riparian areas, biological soil crusts and archaeological and historic resources. We are particularly concerned about the concentration of livestock in fragile perennial streams, wetlands and riparian areas.	NPCA & Coalition GSE RMP scoping FINAL.pdf
Phillips	Bob	N/A	Direct, Indirect	My first proposal is to further restrict ORV, 4x4, UTV, ATV, and motorcycle use within the monument. It is well established that off-road vehicle use damages ecosystems, cultural and archaeological sites, and paleontological resources.	impacts of off-road vehicle noise on wildlife.pdf
J	A	N/A	Resource & Area Mgmt	So often scientific work is done on public lands, but these data are rarely provided to the DOI or incorporated into management decisions, so let's see reporting requirements for these folks as well. After all, the GSENM was created in part for providing opportunities for scientific research. There should be a central repository where the public can easily review past/present/future special use permits, scientific studies, and grazing allotments. In addition, GSENM should be maintaining a robust geospatial database of where these permits are being granted so spatial and temporal analyses can be performed to evaluate cumulative effects.	GSENM_20220923.docx
Action Committee	CTVA	Capital Trail Vehicle Association	Monitoring	.The agency should adequately monitor evaluations and decisions so that they are not made based on beliefs and are made on site-specific data.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Monitoring	The agency should adequately monitor the use of an adequate sense of magnitude in the evaluations and decision-making so that decisions are not arbitrary and capricious by comparing naturally occurring levels of impact to the impacts of human use established by data and site-specific data.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Monitoring	The agency should adequately monitor whether site-specific data that compares any purported impact of significance from motorized recreation and dispersed camping to the naturally occurring levels of impact and change is being used.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Monitoring	The agency should adequately monitor whether the purported negative impacts of motorized recreation including e-bike have sufficient and appropriate site-specific data and studies and are being compared to natural levels.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Murray	Michael B.	Coalition to Protect America's National Parks	Monitoring	Monitoring and Adaptive Management To ensure that the best possible policies are in place, we strongly recommend BLM incorporate a provision for close monitoring of resource impacts and degradation as well as the ability to incorporate adaptive management to be able to address unanticipated impacts or environmental degradation stemming from allowed activities.	NPCA & Coalition GSE RMP scoping FINAL.pdf
Popejoy	Mike	Grand Canyon Trust	Monitoring	VEG-4: Monitor the known populations of rare plants. This could be done in collaboration with universities or other researchers.	Appendix A - Figures & Tables.pdf
Sjogren	Morgan	N/A	Monitoring	Reference Areas Reference areas where grazing, chaining, and non-native seeding are not allowed can allow monument management and scientists to survey how the landscape and native/endemic flora recovers when these uses are not in place. These sites could also benefit the work of scientists within the monument.	40 Mile Gulch _ June 2018.pdf
McCoy	Melissa	U.S. EPA Region 8	Monitoring	According to the AMS, there are a number of livestock grazing allotments that do not meet BLM Utah Land Health Standards (LHS) due to livestock grazing, where livestock grazing is a contributing factor to not meeting LHS, and where failure to meet LHS is due to factors other than livestock grazing (p. 5-26). We recommend that the Draft EIS include a discussion of how monitoring requirements will be applied to permits and grazing adjustments made to ensure that the Utah Standards for Rangeland Health and Guidelines for Livestock Grazing Management are met. For example, an explanation regarding how the Annual Operating Instructions will ensure compliance with monitoring and management requirements for parameters such as water quality would be helpful. To evaluate and adjust grazing management strategies, we recommend a monitoring section that describes how monitoring will be implemented on an allotment level and watershed or sub-watershed level to determine rangeland conditions including water quality status and trends. A wide array of monitoring options exists, and we are available to discuss the options if desired.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
King	Catherine	Utah Native Plant Society	Monitoring	Monitoring data are needed for all the rare plants known from GSENM, including the 15 BLM Utah Sensitive species, those plants on the Utah Native Plant Society or the Utah Natural Heritage Program lists. In particular additional surveys are needed for the federally listed threatened or endangered species, Welsh's milkweed (Asclepias welshii) and Navajo sedge (Carex specuicola) that may be discovered within GSENM boundaries. Monument biologists need to determine if populations of rare and special status plants are stable, increasing, or declining, and if adequate recruitment is occurring to replace individuals as they die. UNPS would be pleased to support monument biologists to do this monitoring.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Monitoring	Collaborate with researchers (including UNPS) to conduct surveys and monitoring of rare plants.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Monitoring	Monitor the status of rare plants over time and determine if any rare plants are declining and seek to identify and remedy the causes if possible.	UNPS on GSENM 2022 (1).docx

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Action Committee	CTVA	Capital Trail Vehicle Association	Inventories, Mapping, GIS	For assessment of negative and positive impacts on the human environment, the agency should develop site specific data, evaluations and comparisons by collection and development of site-specific data and evaluations for each route including: a.Interviews with motorized recreations to find out their needs and values for each motorized route, b.Document why motorized recreationists enjoy this route, c.Who is using each road and trail by development of a Need Factor for each route. i.The Need Factor should be based on category of user (non-motorized or motorized), observed number of users during a reasonable monitoring period, and divided by the total number of users. ii.For example, 90 motorized visitors and 10 non-motorized users observed over 4 weekends equals a Need Factor of 0.90 for motorized users and 0.10 for non-motorized users. iii.Route availability should then be based on these Need Factors. d.Is this motorized route part of a network or destination?, e.Research to document the history of the route including historic wheeled use and historic pioneer and mining use. f.Quality of the route, g.Alternatives that would allow sharing of the route, h.Document who is working to maintain the route, i.Site-specific data for each of the claimed negative impacts from motorized access and motorized recreation on the natural environment, j.Site-specific data and analysis of e-bike recreation, k.The agency should adequately consider that motorized recreation and dispersed camping opportunities should not be closed without site-specific data and analysis as required by NEPA, and CEQ guidance, l.and benefits to the human environment including flow by use of the route.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Inventories, Mapping, GIS	For assessment of negative and positive impacts on the natural environment, the agency should develop site specific data, evaluations and comparisons by: a.Collection and development of site-specific data including monitoring for each route, b.Development of site-specific positive and negative impact evaluations for each route, c.For both positive and negative impacts on the natural environment, the test of significance should be made using a comparison to the natural level of impacts occurring on each route. d.The agency should adequately consider that impacts on fish and wildlife should not be assumed and impact analyses should be based on adequate site-specific data and studies. e.The agency should adequately consider only site-specific data that demonstrates that closures of motorized and dispersed camping opportunities produce significant benefit to the natural environment. f.The agency should adequately consider that the road density impact criteria are not site-specific and, consequently, not valid for the project area. g.The agency should adequately consider the need for site-specific data and the value for decision-making as demonstrated by 6 years of monitoring in Yellowstone National Park which demonstrated little impact to wildlife from snowmobiles.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Inventories, Mapping, GIS	The agency should develop site-specific data and Need Factors for each route and the decision establishing the amount of non-motorized versus motorized opportunity is uninformed and unreliable.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Popejoy	Mike	Grand Canyon Trust	Inventories, Mapping, GIS	VEG-16: Ensure that pinyon-juniper forests receive surveys to establish stand and individual tree age. This includes coring a representative sample of trees.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Inventories, Mapping, GIS	VEG-2: Use models to conduct targeted field surveys to look for rare plants. This could be done in collaboration with universities or other researchers.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Inventories, Mapping, GIS	HYDRO-6: Inventories, modeling, and field investigations for both relict plant communities and hanging gardens will be conducted. Current information on the location of these associations in the Monument is largely anecdotal and may change following consideration of inventory data. (from RHG-9 in 2000 MMP)	Appendix B - RNA Proposals.pdf
Eaton	Marietta	N/A	Inventories, Mapping, GIS	Is there a current bibliography of all the science that has been conducted on GSENM? What science will be used to inform management decisions to date? BLM should require researchers to make suggestions for management of the resources they study and to continue to conduct outreach for any research approved on GSENM.	GSENM NOI Response.docx
Not Provided	Not Provided	N/A	Inventories, Mapping, GIS	Since 1996 an extensive amount of science has been conducted on GSENM. How will past research and more recent data and science in general be incorporated into this RMP and into the future management of GSENM?	GSENM NOI Response.docx
Miller	Scott	The Wilderness Society	Inventories, Mapping, GIS	Datasets that help to identify areas of local significance are also important to ensure that the most important ecological resources within a local area are identified and appropriately managed. Such a perspective may be especially important in the context of managing a national monument in accordance with the Antiquities Act, which requires the protection of objects of historic and scientific interest within the boundaries of the monument.	GSENM TWS Scoping Supplement 2022.docx
King	Catherine	Utah Native Plant Society	Inventories, Mapping, GIS	Conduct surveys for rare plants based on models that predict the possible locations of each species.	UNPS on GSENM 2022 (1).docx
Action Committee	CTVA	Capital Trail Vehicle Association	Mitigation	The agency should adequately consider and mitigate the significant negative cumulative effect of all motorized closures on the public.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Mitigation	The agency should adequately consider and mitigate the significant negative cumulative effect of all motorized closures on the youth, disabled, elderly, and veterans.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Mitigation	The agency should not complain about the impact in high use areas because the agency created significant impacts on the natural and human environment by squeezing 93% of the visitors (motorized recreationists) into an inadequate number of areas and opportunities. a. The agency should take responsibility and mitigate all impacts associated with this issue.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Marynowski	Ian	N/A	Mitigation	More effort should be take to mitigate vistior impacts. The visitor are here and toursim ( commercial or otherwise) represents an "extrative and destruction" resource as per with cattle grazing and small such as oil and gas. It should truely be considered and controlled more pro-activley than it has been in the past. More developed campgrounds, better designated trails and stricter permitting conducted AT the visitor center come to mind.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
McCoy	Melissa	U.S. EPA Region 8	Mitigation	We recommend the Draft EIS identify the mitigation that will be applied to BLM-authorized activities, including what entity will be executing the mitigation, inspection schedules, documentation procedures, and accountability processes. With these considerations in mind, we recommend the EIS include the following information for each mitigation measure: - A description of the required mitigation and its expected effectiveness. - Designation of the entity responsible for implementing the mitigation. - Identification of how BLM would ensure that the mitigation would be monitored to ensure timely and correct implementation as well as timely maintenance. - Identification of funding sources and any financial assurance requirements. If adaptive management practices will be utilized, we recommend the Draft EIS include the following information: - A defined monitoring plan. - Specific environmental thresholds which would trigger action. - Management alternatives and mitigation measures that would be implemented should a threshold be exceeded. - An evaluation procedure for determining the effectiveness of the implemented mitigation and further measures to take in cases of ineffectiveness. - A description of the mechanisms for the public disclosure of monitoring data, its analysis, and related management decisions.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
McCoy	Melissa	U.S. EPA Region 8	Mitigation	Describing a suite of potential mitigation measures, under jurisdiction of BLM, project proponents, and others, can serve to alert other agencies or officials about potential protective measures that can be implemented.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
McCoy	Melissa	U.S. EPA Region 8	Mitigation	We support BLM's ongoing efforts to reduce grazing impacts through the use of BMPs protect sensitive soils, wetlands, riparian areas, meadows, stream crossings, and critical habitat. We recommend the RMP include design criteria to be utilized and refined during future site-specific analyses, including mitigation and monitoring measures to reduce the potential for aquatic resource impacts. Inspection, maintenance, and adjustment of BMPs will help protect groundwater and surface water resources. We recommend the Draft EIS include a list and discussion of mitigation measures under each alternative with consideration of the following: -Special protections, such as buffer zones, for high quality riparian and wetland resources including springs and wet meadows. - Management to limit deposition of animal waste in and adjacent to water bodies, including protecting or repairing any existing exclusions; providing upland water developments; and development of new range improvements to discourage congregation near water bodies. - Monitoring to assess effectiveness of range improvements in protecting aquatic resources. - Enhanced monitoring of resource conditions adjacent to high value water resources. Other tools for consideration include pasture rotation based on minimum stubble height, modification of allotment boundaries and controlled timing of grazing to prevent damage to stream banks and riparian areas when they are most vulnerable to trampling damage. In addition, the planning area is experiencing historic drought, therefore we recommend the alternatives evaluate grazing strategies to help maintain vegetation, soil, and aquatic resources in their desired conditions. For instance, BLM could consider strategies such as deferring grazing on pastures with inadequate stubble height until dormancy, reducing stocking rates and reducing fertilizer and herbicide inputs.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	NEPA (National Environmental Policy Act)	The agency should adequately consider that the significant closing of motorized routes in the project area should meet the basic requirement of the NEPA act of 1969 as stated in "Sec. 101 (b) (5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities".	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Popejoy	Mike	Grand Canyon Trust	NEPA (National Environmental Policy Act)	First, BLM must catalogue the past, present, and reasonably foreseeable projects in the area that might impact the environment. Muckleshoot Indian Tribe v. U.S. Forest Service, 177 F.3d 800, 809-10 (9th Cir. 1999). Second, BLM must analyze these impacts in light of the proposed action. Id. If BLM determines that certain actions are not relevant to the cumulative impacts analysis, it must "demonstrat[e] the scientific basis for this assertion." Sierra Club v. Bosworth, 199 F.Supp.2d 971, 983 (N.D. Ca. 2002). A failure to include a cumulative impact analysis of actions within a larger region will render NEPA analysis insufficient. See, e.g., Kern v. U.S. Bureau of Land Management, 284 F.3d 1062, 1078 (9th Cir. 2002) (analysis of root fungus on cedar timber sales was necessary for an entire area).	Appendix A - Figures & Tables.pdf
Berry	Scott	N/A	Process	At many points, the AMS describes the temporal scale of the analysis as the "life of the RMP". The use of this scale should be discontinued, as unduly vague and non-specific, given that the lifespans of RMP's are subject to substantial variation. The temporal scale of any analysis should be matched to the subject of investigation. Features that change slowly over time need to be analyzed at scale that will reveal those changes. The planning life of a typical RMP is 10 years, which should be used as the minimum temporal scale for analysis, extended as necessary for features where the rate of change is slower.	RAD Management (2).pdf
Sjogren	Morgan	N/A	Process	NEPA Process: A complete survey of GSENM and NEPA process is needed to ensure that multi-use land management objectives do not conflict with these legally required management objectives and/or harm monument objects. It will also help measure monument objects. The public and Tribes need to be included in each step of the NEPA process.	40 Mile Gulch _ June 2018.pdf
Berry	Scott	N/A	Process	Objectives must be specific and measurable and should have established time frames for achievement. Objectives should identify indicators for evaluating progress towards the achievement of the objective, and these indicators should be the same indicators as described in the monitoring and evaluation standards. These terms are now included within the term "management recommendations" under the current version of the rule. While the Planning Rule 2.0 regulations are not currently binding, they certainly provide a carefully thought out, detailed, science-based template for RMP planning documentation. It is within the discretion of the agency to use the Planning Rule 2.0 provisions in this planning effort to supplement the current version of the rule.	RAD Management (2).pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Collaboration, coordination, and partnerships	Provide Adequate Coordination with Local and State Government I.The agency should adequately consider coordination with all surrounding counties is required and should be adequately provided.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Murray	Michael B.	Coalition to Protect America's National Parks	Collaboration, coordination, and partnerships	Coordination with Stakeholders Because national parks and monuments share both boundaries and resources and are, to some extent, interdependent, it is important for land managers to engage with other agencies, decision-makers and stakeholders. We urge the agencies to maintain ongoing communication and strong coordination with NPS managers of adjacent parks. Their expertise and cross-boundary management experience can and should help shape the management of the GSENM.	NPCA & Coalition GSE RMP scoping FINAL.pdf
Murray	Michael B.	Coalition to Protect America's National Parks	Collaboration, coordination, and partnerships	Grazing Adjacent to Capitol Reef National Park NPCA and the Coalition also encourage BLM to work closely with Capitol Reef National Park staff to ensure livestock grazing and trailing in the GSENM landscape is consistent with the Livestock Grazing and Trailing Management Plan for the park. This is particularly important as three traditional stock trails crossing Capitol Reef National Park connect the GSENM monument to lands east of the park. Therefore, any alteration to the number and management of AUMs in this area could have direct impacts on sensitive park resources.	NPCA & Coalition GSE RMP scoping FINAL.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Murray	Michael B.	Coalition to Protect America's National Parks	Collaboration, coordination, and partnerships	Recreational Use and Visitor Services and Travel, Transportation and Access Management We appreciate BLM's focus on and recognition of the need to address increased motorized and non-motorized recreation in GSENM in the RMP to protect monument objects and values. The AMS at 5-35 notes the dramatic increases in visitation to the nearby national parks between 2007 and 2021, more than doubling in Zion National Park (to a record 5 million visitors in 2021), increasing 108 percent in Bryce Canyon and 153 percent in Capitol Reef. NPCA has identified overcrowding as one of the most pressing and complex challenges facing national parks in their second century - degrading park resources (e.g., increased instances of graffiti, litter and improperly disposed-of human waste; soil erosion and plant loss; wildlife disturbance and habitat degradation) and diminishing the visitor experience (e.g., traffic congestion, long lines, crowding at keystone sites, increased search and rescue). It is critical for BLM and NPS to work across their jurisdictions to manage visitor access and recreation, ideally through regional recreation planning such as the Zion Region Recreation Management planning process 21 to ensure that "recreation spillover" is managed in a coordinated, thoughtful and sustainable way. We are particularly concerned that dispersing visitors across federal land recreation destinations has been identified repeatedly as a tool to reduce crowd density at heavily visited destinations. While dispersal as a strategy might provide some relief to parks experiencing intense crowding, unintended consequences of increased visitation in new places adds to management burdens and poses long-term threats to irreplaceable resources (see GCT et. al. comments under Recreation Use and Visitor Services for a thorough discussion of resource impacts from non-motorized recreation). For instance, as recreation has expanded in recent years, we've witnessed more instances of cultural resource defacement (e.g., graffitied petroglyphs), an uptick in search and rescue operations (which stress staff capacity and mental and physical health), as well as "spill over" effects of crowding to new destinations. 21 Zion Regional Recreation Management Plan available at <a href="https://www.conservationfund.org/projects/zion-regional-recreation-management-plan">https://www.conservationfund.org/projects/zion-regional-recreation-management-plan</a>	NPCA & Coalition GSE RMP scoping FINAL.pdf
Murray	Michael B.	Coalition to Protect America's National Parks	Collaboration, coordination, and partnerships	The GSENM Resource Management Plan (RMP) is an opportunity to return to managing the monument and the parks in an interconnected manner such that each unit serves as protection for its neighboring unit. To do this, we encourage BLM to reestablish zones to manage recreation as it did in the original plan for Grand Staircase-Escalante - compatible with management goals and objects for adjacent federal land where consistent with protecting monument objects and values.	NPCA & Coalition GSE RMP scoping FINAL.pdf



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Not Provided	Not Provided	Coalition to Protect America's National Parks	Collaboration, coordination, and partnerships	<p>Input Regarding Planning Criteria The Analysis of Management Situation (AMS) sets forth several preliminary management concerns and analytical frameworks for addressing preliminary issues. We request that the Agency consider the following additional planning criterion in development of the draft management plan: BLM will strive for consistency of management decisions with other adjoining federal planning jurisdictions, particularly the National Park Service, where compatible with protecting monument objects and values. This criterion directly aligns with Proclamation 10286 as it states, "The Secretary, through BLM, shall consult with other Federal land management agencies or agency components in the local area, including the National Park Service, in developing the management plan." Pres. Proc No. 10286, 86 Fed. Reg. 57,335 (Oct. 8, 2021) Given their proximity to and connection with National Park System sites, it is our hope that BLM managers will utilize, under this criterion, the expertise of NPS officials to help shape the management of the adjacent landscape. Such collaboration will likely help prevent impacts from incompatible uses, while also sharing NPS expertise in visitor and recreation management and interpretation. NPS has strong authority to protect its resources from harmful impacts on nearby lands. The significance of park resources, including scenic values, at our national parks and the responsibility of NPS to protect them was clearly articulated in the Organic Act of 1916: "... to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." Further, because national parks are not islands of protection, and their scenery and fundamental resources are more often at risk from adverse impacts originating outside national park boundaries, the NPS Management Policies 2006 (§ 4.1.4) outline well the responsibility of NPS to engage with other agencies and decision-makers: "... the Service will seek the cooperation of others in minimizing the impacts of influences originating outside parks by controlling noise and artificial lighting, maintaining water quality and quantity, eliminating toxic substances, preserving scenic views, improving air quality, preserving wetlands, protecting threatened or endangered species, eliminating exotic species, managing the use of pesticides, protecting shoreline processes, managing fires, managing boundary influences, and using other means of preserving and protecting natural resources." In addition to select issues outlined below, we emphasize the importance of ensuring management of the monument lands that are adjacent to the national parks complement and are consistent with park management. In particular, management of the Waterpocket Fold area must be consistent with the adjacent primitive and semi-primitive zones in the Waterpocket Fold District of Capitol Reef National Park as defined in the park's General Management Plan. "In Capitol Reef National Park, the primitive zone represents the highest order of wilderness qualities, where isolated landscapes remain in an essentially wild and undeveloped condition...The primitive zone provides abundant opportunities to experience wilderness solitude and natural quiet. The area is substantially free of modern human influence and alteration...natural processes and conditions are perpetuated...The National Park Service maintains close control over resource-damaging activities."3 3 Capitol Reef Gen. Mgmt. Plan at 28 (1998), available at <a href="https://www.nps.gov/care/learn/management/upload/caregmp.pdf">https://www.nps.gov/care/learn/management/upload/caregmp.pdf</a> Capitol Reef National Park's semi-primitive zone is: "...similar in nature to the primitive zone, except that evidence of human activity is more pronounced, road corridors are more abundant, and access is easier."4 4 Id. at 29 Similarly, Bryce Canyon National Park's Foundation document identifies the resources and values that make Bryce Canyon National Park nationally significant and worthy of designation as a national park. Significant resources and values that could be affected by decisions on park-adjacent lands, including those under consideration by BLM in the current scoping process, include the park's viewshed, clean air, dark night skies and natural soundscapes. Bryce Canyon National Park's Foundation Document states: "The location of the park at the summit of the Grand Staircase, surrounded by a system of nationally protected lands, and combined with the exceptional clarity of the air and natural quiet, provides a multisensory experience. The outstanding views often extend more than 100 miles and begin with the colorful and intricately carved Claron Formation and include panoramic vistas of cliffs, canyons, and forested landscapes." And "With a nearly pristine night sky, thousands of stars shine brightly at Bryce Canyon National Park. As one of the darkest publicly accessible places in North America, the Milky Way Galaxy can be viewed from horizon to horizon. The clear, clean air and a lack of artificial light in the park and the region are essential to this unparalleled nighttime experience. The darkness is also an important resource for nocturnal wildlife."5 5 Bryce Canyon National Park Foundation Document (Bryce Canyon Foundation Doc.) at 8 (May 2014), available at <a href="https://www.nps.gov/brca/learn/management/upload/BRCA_FD_SP.pdf">https://www.nps.gov/brca/learn/management/upload/BRCA_FD_SP.pdf</a> Management decisions for GSENM could have the greatest impact on Glen Canyon National Recreation Area (GCNRA) given the significant stretches of monument land adjacent to its boundaries. Management decisions made on land near GCNRA should be consistent with the park's purpose and protect its recommended wilderness as identified in the GCNRA Foundation Document: "Glen Canyon National Recreation area, located at the center of the Colorado Plateau, provides for public enjoyment through diverse land- and water based recreational opportunities, and protects scenic, scientific, natural, and cultural resources on Lake Powell, the Colorado River, its tributaries, and surrounding lands."6 And, "Glen Canyon National Recreation Area includes 588,855 acres of proposed wilderness and 48,955 acres of potential wilderness. Together this represents 51% of the total land area of Glen Canyon National Recreation Area, containing a variety of culturally and ecologically unique landscapes where visitors can experience the character and solitude of wilderness within a recreation area."7 6 Glen Canyon National Recreation Area Foundation Document at 1, available at <a href="http://www.npshistory.com/publications/foundation-documents/glca-rabr-fd-overview.pdf">http://www.npshistory.com/publications/foundation-documents/glca-rabr-fd-overview.pdf</a> 7 Id. at 6</p>	NPCA & Coalition GSE RMP scoping FINAL.pdf
Anon	Anon	Garfield County	Collaboration, coordination, and partnerships	<p>Consistency between federal, state, local, and tribal plans is the desired outcome for the coordination and cooperation processes required of federal agencies. The importance of coordination and cooperation between state, local, and Federal agencies during planning processes cannot be overstated. Early involvement and equal consideration in environmental reviews, as Interdisciplinary Team members, stakeholders, and Cooperating Agencies is the State's main objective and motivation for creation of the State Resource Management Plan.</p>	N/A
Popejoy	Mike	Grand Canyon Trust	Collaboration, coordination, and partnerships	<p>The Monument managers should additionally consult with UDW R on the status and trends of wildlife within the Monument, to inform wildlife habitat needs in the decision area.</p>	Appendix B - RNA Proposals.pdf
Sorenson	Craig	N/A	Collaboration, coordination, and partnerships	<p>- Grand Staircase Escalante Partners is a non-profit support organization for the BLM and Monument. This plan needs to recognize and embrace the contribution they can make with the use of volunteers who help to conserve and protect the Monument's objects of value?</p>	GSENM Management Plan Comments.pdf
Marynowski	Ian	N/A	Collaboration, coordination, and partnerships	<p>Considering working with county to pave Hole in the Rock Road (HITRR) to the spookey and pekaloos TH may also be beneficial. Pairing HITRR would increase SAR and minimize dust and chemical use which impacts surrounding landscapes.</p>	N/A

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Not Provided	Not Provided	N/A	Collaboration, coordination, and partnerships	Monument advisory councils that are fairly composed to include local residents, business owners (including livestock/ranching), and local heritage experts should be organized for monument planning purposes.	N/A
Veranth	John	N/A	Collaboration, coordination, and partnerships	Recommendations on Volunteers 1)Integration of volunteer resources should be an explicit component of the management plan. Designating a formal volunteer coordinator provides a point of contact and a connection to the resource staff. 2)Budgeting should consider volunteer resources when determining project feasibility and timing. 3)Develop an expanded program to use volunteers for things like monitoring backcountry trail conditions, reporting real-time road conditions, monitoring known archaeological and paleontological sites for vandalism, and similar labor intensive but important tasks. There are many individuals out on the monument on a near-daily basis who have information that can be of use to the agency law enforcement and resource protection staff.	Veranth Scoping 926.pdf
Allison	Robert	N/A	Collaboration, coordination, and partnerships	In other parts of the world such as South Africa and Australia successful collaboration between livestock owners, ranchers, and grazing stakeholders has been achieved to strengthen ecological and conservation outcomes whilst supporting the cultural history and livelihoods of livestock owners. The processes, policies, and mechanisms through which this was achieved may hold insights for novel approaches and alternatives in GSENM.	N/A
Not Provided	Joe	N/A	Collaboration, coordination, and partnerships	The Utah Backcountry Pilots have successfully renewed MOUs in place with the BLM to provide cooperative maintenance of backcountry airstrips.	N/A
Veranth	John	N/A	Collaboration, coordination, and partnerships	Volunteers can supply the necessary resources to implement many of the ideas for enhancing recreational experiences as discussed above. Needs range from cleanup projects at "trashed" dispersed car camp sites, to invasive species removal (Russian olive as a model), to construction of trailheads, to wildlife population surveys, and much more. The GSENM management plan should take advantage of opportunities to use volunteers to supplement agency resources. Many organizations including the GSENM Partners, Grand Canyon Trust, and Wilderness Volunteers, Utah Wilderness Association and others have been active in the monument area since before the 1996 proclamation and continuing since.	Veranth Scoping 926.pdf
Berry	Scott	N/A	Collaboration, coordination, and partnerships	The principal way in which a new RMP can contribute to the accomplishment of this goal would be to commit to building a permanent non-determinative structure for collaboration around this question. The ultimate solution to this challenge will not be found in executive orders, or in demands that historic use patterns continue unchanged. New ideas will be required, and those new ideas will only be generated by a continuing, deep conversation among all the interested parties; ranchers, community residents, conservationists, recreationists, land managers, economists and scientists.	RAD Management (2).pdf
Allison	Robert	N/A	Collaboration, coordination, and partnerships	In other parts of the world such as South Africa and Australia successful collaboration between livestock owners, ranchers, and grazing stakeholders has been achieved to strengthen ecological and conservation outcomes whilst supporting the cultural history and livelihoods of livestock owners. The processes, policies, and mechanisms through which this was achieved may hold insights for novel approaches and alternatives in GSENM.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Collaboration, coordination, and partnerships	In the spirit of co-stewardship, we would like to request that GSENM work in partnership with the Navajo Nation and other associated tribes in its science and monitoring programs. This would include the participation of tribal members in research, data collection, monitoring, and analysis.	N/A
Jones	Robert	Southernmost EAA Chapter 1241	Collaboration, coordination, and partnerships	BLM is well served by having The Recreational Aviation Foundation (RAF) willing to partner in the EIS/RMP process. RAF has an outstanding record of working responsibly, collaboratively and successfully with government agenices, including BLM and USFS, to bring together a variety of government agencies, pilots, non-pilots, business communities, and other stake holders along with the RAF's experience to achieve outcomes that benefit all parties involved. I respect the RAF's track record and have seen their multiple layers of assistance, from work party mobilization to facilities grants, joined with an intimate knowledge of airstrip operations, unique functional limitations, maintenance needs, appropriate utilization guidance regarding aircraft types and pilot skills as well as detailed web based publication of targeted guidance for what pilot users should know before use through the RAF's AIRFIELDS GUIDE.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Collaboration, coordination, and partnerships	Consult with stakeholders, tribes, US Congress ... We recommend that language include local government representatives, cattlemen, timber men, representatives from oil and gas companies, Garkane (GEC) and South Central Utah Telephone Association (SCUTA) or South Central Communications (SCC) in-holders and homesteaders who are affected by decisions! We have been laden with rules and laws that restrain our rights to maintain our families by the natural ways of tilling the land and raising animals. We have been restrained from using the resources we have to provide sustenance in an economic environment. We have been told to make a life from the tourist that comes to do damage, but to welcome them with open arms, but they only require food that we obtained, shelter that we built, technology that we fought and paid for, and sadly our Voice for Justice is asked for by GSENM, received, but disregarded.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Collaboration, coordination, and partnerships	Inasmuch as the Proclamation of the Monument in 1996 was in total disregard to the government of Utah, and more particularly, blindsided the governments of Kane and Garfield Counties, it has become abundantly clear that it is more important than ever to include all of the stakeholders in management decisions, but more importantly those who live close to the land and depend on them for their livelihoods.	N/A
McCoy	Melissa	U.S. EPA Region 8	Collaboration, coordination, and partnerships	Thank you for the opportunity to participate in the planning effort for the GSENM RMP and we are committed to working with you as you prepare the EIS. EPA hopes to assist BLM in the development of an analysis that will assess potential environmental impacts and identify potential mitigation measures.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
King	Catherine	Utah Native Plant Society	Collaboration, coordination, and partnerships	We highly recommend that you consult with Dr. Walter Fertig and his wife Laura Welp, as they are considered by many as being the foremost experts on the flora of the Grand Staircase-Escalante National Monument. Walt Fertig is currently curator of collections of the herbarium at Washington State University in Pullman, Washington. He spent many years as a board member of UNPS and editor of the Sego Lily. Another great source (among so many others) is Dr. Stanley Welsh, BYU professor emeritus and author of the Utah Flora and co-founder of UNPS, who spent many years studying the Kaiparowits Plateau.	UNPS on GSENM 2022 (1).docx

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Goreham	Dennis	Wasatch Mountain Club	Collaboration, coordination, and partnerships	Service work: Many organizations including the Wasatch Mountain Club, and others, have a history of service. They should be utilized in both this planning process and for maintenance in the Monument. There are areas where barriers need to be rebuilt, old roads obliterated, trails built or repaired, etc. Much of this could be done through engaging and organizing volunteers from these organizations.	GSENM WMC comment 09182022.doc
Poe	Noel	High Desert Backcountry Horsemen	Cooperating agency relationships	Some of the local long-term staff and managers may remember when Vermilion National Monument management plan was considering prohibition of equine use in upper Buckskin Canyon. This occurred because a few responders complained about the health hazards of horse manure. There is scientific documentation on the lack of health hazard possibilities with horse manure. We provided KFO and Arizona Strip Field Office (ASFO) management with this research. Cattle manure is a health hazard, and certain species of wildlife waste is hazardous. Human body waste is even more of a health hazard. If you are challenged about horse manure during Scoping or the EIS process, please contact HDBCH or BCH of America (BCHA). (HDBCH appreciates that KFO and ASFO management studied the research we provided and decided horses could continue to use Buckskin Gulch.)	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Cooperating agency relationships	19. Wildlife and Fisheries The State provides its scoping comments on wildlife and fisheries through two of its agencies. These agencies' input are as follows.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Cooperating agency relationships	It is the understanding of the State of Utah (the "State"), that the result of this planning process will revoke the existing Monument Management Plan and replace it with the new Land Use Plans. The State is aware of the aggressive timeline imposed on this project and generally supports speedier and more efficient planning efforts. However, it is imperative that efficiency does not come at the expense of State and local governmental participation. With most land use planning efforts, including the previous monument management planning effort, the State and other cooperating agencies were able to participate in the alternative development phase of planning. It appears that BLM has largely excluded Cooperating Agencies ("CA") from that phase to meet the imposed timelines. The State believes that full participation as a cooperating agency includes involvement in the interdisciplinary process and volunteers its expertise and time to that process including alternative development. Only by working together will the BLM meet its obligation to create a monument management plan that is consistent with State and local Resource Management Plans to the maximum extent allowable by law.(3) (3) 43 U.S.C.A. § 1712(c)(9).	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Cooperating agency relationships	The Utah Division of Wildlife Resources (DWR) would like to be a collaborative partner throughout the development of the GSENM RMP. The GSENM has many unique wildlife values that present management challenges under a multiple-use framework. These challenges may necessitate close collaboration with DWR. Many game and non-game fish, reptile, amphibian, mollusk, mammal, and avian species, including multiple species of greatest conservation need, live within the GSENM. DWR can provide a detailed list of species to consider for this planning effort.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Cooperating agency relationships	Consequently, the State requests timely and meaningful coordination with the State and local governments to ensure that the GSENM RMP planning process remains consistent with State and local RMPs.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Cooperating agency relationships	The DWR looks forward to the continued collaboration in forming the GSENM's new RMP, from scoping through the final record of the decision.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Murray	Michael B.	Coalition to Protect America's National Parks	Government-to-government consultation	BLM must engage Tribal Nations early in the planning and decision-making process to prioritize traditional ecological knowledge and better protect cultural resources and values. Meaningful consultation with Tribes throughout the public lands management planning process is necessary to identify traditional cultural properties, sacred landscapes, traditional uses and other issues and concerns within the monument. In addition, the BLM must incorporate traditional cultural knowledge and Tribal representatives in co-stewardship and management of the monument and the interpretation of monument history, cultural sites and traditional uses.	NPCA & Coalition GSE RMP scoping FINAL.pdf
Bauman	Sarah	Grand Staircase Escalante Partners	Government-to-government consultation	"Tribal perspectives are extremely rare in any of the reports synthesized in this overview, and hence they are sorely lacking in the following discussions. But as more archaeologists embrace the wisdom and oral traditions of indigenous groups, chances are that tribal voices will ring more prominently in future publications than they do in this one." Deep Roots: A 10,000-Year Indigenous History of the Grand Staircase-Escalante National Monument by Jerry D. Spangler and Matthew K. Zweifel This statement from the Deep Roots publication is a call to action for the Bureau of Land Management. Tribal voices, perspectives, and knowledge are essential to our ability to protect and care for culturally vital historic sites; however, the proposal does not reflect a plan to address this. Data Gaps: In order to understand and manage historic properties with cultural significance for the Tribes, the following data gaps must be addressed in consultation with Tribes: - Ethnographies: Both the BLM and the Tribes with identified connections to this landscape have articulated a need for ethnographies. Ethnographies could provide critical information about how to best manage cultural resources and sacred sites within the monument, and completion of ethnographies driven by consultation with the Tribes should be included as part of land management plans. - Cultural Resource Inventories: There is a lack of detailed information about the cultural resources within the monument and therefore the management plan and all Section 106 agreements should include provisions for completing additional cultural resource surveys in consultation with the Tribes and ensuring that Tribes have input regarding if/when a new survey is warranted.	Final GSEP NHPA Section 106 Consultation Comments, 9-27-22.pdf
Bauman	Sarah	Grand Staircase Escalante Partners	Government-to-government consultation	It is unclear how the BLM intends to work directly with the Tribes to ensure meaningful consultation regarding the selection and management of historic sites. The AMS states: Administrative management of the site steward program has recently been transferred to the Utah State Historic Preservation Office to provide for a more consistent statewide program; however, based on language in the 2020 State Protocol Agreement between the BLM and the State Historic Preservation Office (SHPO), there is little to no required meaningful consultation with Tribes on selection and management of historic properties with cultural significance, or the management of BLM projects that may impact these properties. Without meaningful consultation with Tribes regarding the assessment, protections, and management of historic properties with cultural significance, all management actions carry the risk of adversely affecting historic properties of importance to the Tribes and the cultural significance of these properties.	Final GSEP NHPA Section 106 Consultation Comments, 9-27-22.pdf

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Bauman	Sarah	Grand Staircase Escalante Partners	Government-to-government consultation	Throughout the State Protocol Agreement Between the Bureau of Land Management Utah and the Utah State Historic Preservation Office published in 2020, the guidance outlined for if, when, and how to take action to protect historic properties fails to recognize the important role the Tribes play in these determinations. This is relevant to these scoping comments because the agreement has an impact on the protection and management of historic properties with cultural significance for Tribes. The agreement essentially provides a decision tree without whole cultures impacted by the decisions being at the table to build the decision tree. For example, under Section III. PROCEDURES FOR CONSIDERATION OF EFFECTS TO HISTORIC PROPERTIES FROM BLM UNDERTAKINGS, the agreement outlines identification methods for Areas of Potential Effects (APEs), including (1) Review Existing information, (2) Desktop Review, (3) Seek Additional Information, (4) Conduct Surveys, and (5) Survey Exemptions. Tribal input is only required if/when the BLM determines, in partnership with SHPO, that their input (through a severely limited definition of consultation) is warranted. In addition, there is a significant lack of information available to carry out the objectives listed in the agreement and insufficient policies included to protect sensitive information. 1. Lack of information: As previously mentioned, an estimated 5-7% of GSENM has been inventoried, therefore the existing information to review is insufficient to make determinations within an APE. In addition, almost all existing survey information is over 10 years old and the description to use this data to make determinations throughout the 106 process is articulated in the agreement as follows " If the agency official determines that the prior survey information is adequate to identify historic properties, no survey is needed. In cases where the agency official will be using field survey that may be approximately 10-years or older in replacement of conducting a new survey, informal consultation (e.g. phone call or email) with the SHPO is required. After such consultation, the BLM may conclude that the previous survey is adequate, needs supplementation, or is not adequate." This language in the agreement does not require consultation with Tribes regarding potential impacts to sites that are vital to their cultures and family histories and needs to be revised in consultation with the Tribes. 2. Lack of consideration of tribal perspectives and cultures: The agreement between the Bureau of Land Management and the State Historic Preservation Office (SHPO) provides discretion for the DFO and SHPO to make decisions related to how historic sites that are culturally important to Tribes are identified and protected, but it does not provide any discretion to the Tribes. For example, in the agreement it states "Field Manager Discretion: If areas are difficult to access for topographical, geological, ecological, or safety reasons, such areas may be exempted from survey. However, a good faith and reasonable effort should be made to visually assess these areas by aerial photographs, binoculars, spotting scopes, etc. and include background research such as described in Section III.D..." Much of GSENM is difficult to access, and therefore a large degree of discretion will be afforded to the field manager. And, as it currently stands, the Tribes do not have an opportunity to weigh in on these critical decisions about the historic sites that are vital to their cultures. Recommendations: - Create a new agreement done in consultation with the Tribes using the resources and directives listed under question 4. above and provide financial compensation for Tribes to participate in this process. - Ensure that there are opportunities and mechanisms in place to ensure that decision-making includes meaningful tribal input regarding if, how, when to conduct surveys. 3. Lack of protections for sensitive information: The agreement allows for the sharing of sensitive information without consultation with Tribes or a formal agreement with Tribes about if or how this information is shared. For example, the agreement states: "A Governor of any state may make a written request to receive certain otherwise protected information about resources in his or her state as long as he or she commits to adequately protect the confidentiality of such information to protect the resource from commercial exploitation." There is no definition provided for what is required to "adequately protect confidentiality" or assurances to the Tribes about how sites that are culturally vital to them, will be protected. Recommendation: Consult with Tribes on all information-sharing policies and procedures and incorporate the findings from this consultation into a new agreement between the BLM, SHPO, and the Tribes.	Final GSEP NHPA Section 106 Consultation Comments, 9-27-22.pdf
Miller	Sally	N/A	Government-to-government consultation	Finally, the BLM should coordinate with NPS to better protect the Glen Canyon NRA backcountry since the GSEM lands are in many places a "gateway" to fragile NRA lands.	N/A
Weppner	William	N/A	Government-to-government consultation	-Harry Barber did not tell the complete truth during a recent virtual public meeting on the GSENM RMP scoping process. When asked about cooperative agreements with ALL local first responder organizations, Barber explained the BLM had an agreement with the Garfield County Sheriffs office. That agreement is specifically for law enforcement activities and the Garfield County Sheriff's Department Search & Rescue. No cooperative agreements have been established with local Fire & Rescue Departments or the Garfield County EMS services. Vehicular and aircraft accidents, fires, and extrications (all of which have happened repeatedly on the GSENM) are the responsibility of local city volunteer fire & rescue departments. Medical attention and transport is provided by Kane or Garfield county EMS. 9.I propose the following SOLUTIONS to the issues described above: -BLM/GSENM must establish documented cooperative agreements with all local city or county first responder organizations providing service to the GSENM. -BLM/GSENM management must provide budgeted financial support for Individual first responder organizations providing service on their lands to be used for updating or repairing equipment and vehicles. -BLM/GSENM management must have formal documented standard operating procedures for cooperating and coordinating with each local first responder entity, including quarterly face-to-face meetings. -all actions by first responder entities on the GSENM must be documented in an Incident report and jointly reviewed by GSENM management, the responsible county sheriff, and the local first responder leadership, with emphasis on risk identification and mitigation actions. -GSENM management must have a documented risk management plan, including participation by independent risk management professionals, and a yearly, independent and objective risk management audit.	N/A
Meizen	Thomas	N/A	Government-to-government consultation	I also implore you to consider Indigenous tribes and their cultural sites, priorities, and management recommendations in the plans for the Monument. Indigenous peoples have shown for millennia that they are competent stewards of this land, and their connection to the lands of Grand Staircase- Escalante is rich and deep. The Bureau of Land Management should include them policy and management decisions.	N/A
Trimble	Stephen	N/A	Government-to-government consultation	Lastly, the Biden proclamation calls for far more tribal consultation than the original management plan addressed. We need more than consultation but true collaboration with tribes. The Bears Ears Commission provides a model for GSENM. The management plan should include requirements for indigenous staff and managers to properly embrace and honor indigenous knowledge. Tribal nations must be proactively involved in plan processes, site-specific resource management decisions, and in facilitating ways to protect monument objects and values while retaining traditional use of sacred sites and places of cultural importance. This is an historic opportunity to take the time to get this plan right. Don't rush. Don't cater to local parochial interests. Act with the seventh generation of our descendants in mind.	GSE RMP comments 9-2022.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Crews	Michael	N/A	Government-to-government consultation	One important step to accomplish appropriate protection and management is for BLM to engage Tribal Nations early in the planning and decision-making process to prioritize traditional ecological knowledge and better protect cultural resources and values.	N/A
Sjogren	Morgan	N/A	Government-to-government consultation	The BLM needs to collaborate with the Tribes to establish an Inter-tribal advisory group consisting of Tribes with a connection to this landscape, including the Hopi, Zuni, Diné/Navajo, San Juan Southern Paiute, Kaibab Paiute, Paiute Indian Tribe of Utah, Ute, Ute Mountain Ute, Pueblo of Tesuque, Pueblo of San Felipe, Pueblo of Jemez, and Pueblo of Acoma. The BLM needs to hire an Indigenous tribal liaison to support tribal engagement in all land management decision-making. The BLM should not make any assumptions about cultural sites, resources, or significant areas and consult all Tribes for a more specific and Indigenous-led understanding of the monument, in order to protect these "objects." These so-called monument objects are the homelands and ancestors of the local Tribes, and that needs to be honored when discussing their protection. Each Tribe needs to be able to define and describe these cultural resources (ancestral sites, plants, animals, birds, and minerals) from their own perspectives. And each Tribe, and individual clan, needs to have the ability to manage culturally significant areas according to their perspectives and value systems. Opportunities for Tribes to direct and manage cultural sites need to be included in the RMP.	40 Mile Gulch _ 2 May 2020.pdf
Feder	Sharon	N/A	Government-to-government consultation	Very importantly, Tribal Nations need to have voice in all decisions as there are traditional properties involved which must be honored and respected.	N/A
Cox	Steven	N/A	Government-to-government consultation	More involvement of local Native American Tribes is a necessity. Many of the areas, sites, structures, etc. within the monument are sacred and must receive additional protection. The Management Advisory Committee should have a member of each tribe. It should not be stacked with those people that have a history of opposition to the monument, as is typical in this area. For the MAC to have any credibility, true stakeholders need to be appointed. All MAC meetings should be open to the public and advertised locally.	Comments on the Management Plan for the Grand Staircase Escalante National Monument.docx
J	A	N/A	Government-to-government consultation	TRIBAL CONSULTATION: Let's see more language about tribal consultation in terms of this plan, adaptive management, various activities (e.g. fire fighting) and projects (e.g. tamarisk or russian olive removal).	GSENM_20220923.docx
McCoy	Pete	N/A	Government-to-government consultation	Please include Tribal Nations in the planning processes and resource management decisions.	N/A
Wells	David	N/A	Government-to-government consultation	Please involve the native people in any management plans. Please consult scientists, ecologists and cultural experts rather than bending to the influence of those who wish to profit from destroying this public resource.	N/A
Not Provided	Not Provided	National Wildlife Federation and Utah Wildlife Federation	Government-to-government consultation	We urge the BLM to engage in meaningful tribal consultation regarding the Monument and its Management Plan. As Proclamation 10286 notes, many Indigenous communities have a historic and present-day connection to the Monument and resources within: "Rich in human history, the Grand Staircase-Escalante landscape abounds in evidence of habitation by the Ancestral Pueblo and Fremont cultures." Because of the Monument's cultural and spiritual importance to Indigenous communities, we urge the BLM to engage in meaningful tribal consultation on how to best manage and protect these areas. Such consultation should be consistent with both the spirit and the letter of BLM's guiding laws and policies, including Proclamation 10286, Secretarial Order No. 3403 on tribal engagement and the Department of Interior Instruction Memorandum No. 2002-11 on Co-Stewardship with Federally Recognized Indian and Alaska Native Tribes Pursuant to Secretary's Order 3403. The BLM should also consider comments received during the Council on Environmental Quality's America the Beautiful consultations addressing tribal consultation and coordination. I Council on Environmental Quality, Executive Summary: Tribal comments received during Council on Environmental Quality consultations on the President's America the Beautiful Initiative September 27th - November 23rd, 202, available at <a href="https://www.whitehouse.gov/wp-content/uploads/2022/03/Atb-Tribal-Consultation-Summary.pdf">https://www.whitehouse.gov/wp-content/uploads/2022/03/Atb-Tribal-Consultation-Summary.pdf</a> . To provide for a better understanding of the Monument's cultural resources and history, the Management Plan should include provisions for working with Indigenous communities on conducting cultural surveys, especially where not yet completed. Moreover, the Management Plan itself should include a process for continued Tribal engagement.	GSE Plan Scoping - NWF UWF Comment Letter September 2022.pdf
Jackson	Thomas and Marilyn	Star Ranch LLC	Government-to-government consultation	Escalante City passed an ordinance naming Grand Canyon Trust as persona non-grata because its leaders were making decisions about Escalante from their home in Flagstaff, Arizona. We can't emphasize enough that BLM-GSENM should give greater attention to local governments who have first-hand information and bear the responsibility of the decisions which are made about lands surrounding them.	N/A
Feinberg	Jackie	The Pew Charitable Trusts	Government-to-government consultation	Pew recognizes the lands located within the GSENM as the homelands of Indigenous peoples, including but not limited to the Hopi, Zuni, Diné/Navajo, San Juan Southern Paiute, Kaibab Paiute, Paiute Indian Tribe of Utah, Ute, Ute Mountain Ute, Pueblo of Tesuque, Pueblo of San Felipe, Pueblo of Jemez, and Pueblo of Acoma. As such, the GSENM RMP process, as well as its implementation, should include meaningful tribal consultation and collaboration, integration of Indigenous Traditional Ecological Knowledge (ITEK) where appropriate, and, as directed by presidential Proclamation 10286 restoring the monument, "ensure the protection of sacred sites and cultural properties and sites in the monument and provide access to Tribal members for traditional cultural, spiritual, and customary uses, consistent with the American Indian Religious Freedom Act (42 U.S.C. 1996) and Executive Order 13007 of May 24, 1996 (Indian Sacred Sites)..."	Pew Comments-GSENM Scoping-9-27-22.pdf
McCoy	Melissa	U.S. EPA Region 8	Government-to-government consultation	It is important that formal government-to-government consultation take place early in the scoping phase of the planning process to ensure that all issues are adequately addressed in the Draft EIS. The principles for interactions with tribal governments are outlined in the presidential "Memorandum on Government-to Government Relations with Native American Tribal Governments" (April 29, 1994) and Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments" (November 6, 2000). As a resource, we recommend the document Tribal Consultation: Best Practices in Historic Preservation,6 published by the National Association of Tribal Historic Preservation Officers. 6 National Association of Tribal Historic Preservation Officers. May 2005. Tribal Consultation: Best Practices in Historic Preservation. Available at <a href="http://www.nathpo.org/PDF/Tribal_Consultation.pdf">http://www.nathpo.org/PDF/Tribal_Consultation.pdf</a> .	FINAL EPA GSENM Scoping Letter 9-27-22.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Lehi	Malcom	Ute Mountain Ute Tribe	Government-to-government consultation	The planning processes must respect and enhance tribal sovereignty. Throughout the planning process and into the future, Tribes must be treated as equals to the United States federal government. I would like to see our knowledge for these lands given deference within and beyond the cycle of this land plan. Although traditional knowledge should be considered as equal to western scientific methods throughout the planning process, BLM should not seek to extract or own traditional knowledge from Ute elders, unless invited, and instead support the Tribe's own transmission of its knowledge to Native youth. As outlined in the recent Permanent Instruction Memorandum No. 2022-011, Tribes must be consulted early. Please also incorporate the doctrine of "Free, Prior, and Informed consent," which is a bottom-up approach to consultation which would benefit the UMU Tribe, local land managers, and the land itself. Co-management can be a powerful tool in elevating tribal sovereignty. However, co-management is a policy term with differing meanings in legal, federal, and tribal contexts. While co-management can refer to shared management roles, it can also refer to documentation of knowledge, funding, and a focus on tribal needs. The term co-management can present challenges, because many cultural beliefs, including ours, do not hold that humans can own and manipulate land, water, sky, and wildlife. Co management policies in the RMP should be devised to primarily benefit Native people and the land itself as detailed in the "Co-management Secretarial Letter" dated September 16th, 2022. Such policies should be developed by asking Native People what actions would support their own indigenous priorities. Federal land managers must serve the needs of and fulfill promises made to tribes. In addition, the BLM must not overburden tribes with management responsibilities unless adequate funding and training are provided.	N/A
Sjogren	Morgan	N/A	Public outreach	The public needs opportunities to continue to comment, protest, and participate in the monument planning and NEPA process. It is a labor of love to make time to work on these comments, and anyone who takes the time to do so deserves to have their voice and perspectives heard.	40 Mile Gulch May 2020.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Public outreach	Comprehensive stakeholder outreach must occur and must, in a meaningful way, bring people together around finding common, locally agreed upon, conservation solutions.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Public outreach	The ongoing management of GSENM should not be done in a manner to further divide people and stakeholders and all parties need to work together to sustainably protect the resources while also protecting the cultural, historical, and traditional uses of the lands contained within the monuments.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Goreham	Dennis	Wasatch Mountain Club	Public outreach	Presidential Proclamation 10286 says the BLM should create and maintain a new management plan and "provide for maximum public involvement" in the development of that plan. Throughout this planning process, the BLM must endeavor to communicate in a variety of ways to solicit input from as many interests as possible.	N/A
Goreham	Dennis	Wasatch Mountain Club	Public outreach	Public Engagement: The RMP and EIS process must identify and engage all stakeholders. Frequent and ongoing input from non-governmental stakeholders is critical to finding consensus-building solutions. This can be done formally through regular Resource Management Committees, or Advisory Councils, or informally through ad hoc working groups addressing specific issues. There could be groups formed in the short term to address preservation, recreation and the economy. This should be done in both the planning process and the long-term implementation of the plan.	GSENM WMC comment 09182022.doc
Action Committee	CTVA	Capital Trail Vehicle Association	Purpose and need	Motorized recreation represents and supports many different visitor interests. Supporting motorized recreation is the best way to support diversity of uses and multiple-use. This over-arching fact should be adequately addressed in the purpose and need and adequately considered in the analysis and decision. We are representative of the needs of most visitors who recreate on public lands but may not be organized with a collective voice to comment on their needs during the public input process. These independent multiple-use recreationists include visitors who use motorized routes for family outings and camping trips, weekend drives, mountain biking, sightseeing, exploring, picnicking, hiking, ranching, rock climbing, skiing, camping, hunting, RVs, shooting targets, timber harvesting, fishing, viewing wildlife, snowmobiling, accessing patented mining claims, and collecting firewood, natural foods, rocks, etc. Mountain bikers have been observed to prefer OHV trails because we clear and maintain the trails and the trails have a desirable surface for biking.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Purpose and need	15.a Flawed Purpose and Need Process 1.Motorized recreationists need trail opportunities similar the abundant hiking and mountain bike trail systems in the project area. The purpose and need process circumvented identifying and addressing this critical issue. 2.The agency should adequately recognize that restricting comments to only those that address specific routes does not adequately address the overarching significant issues that are negatively impacting motorized recreationists. 3.The agency should not use comment rules so that significant issues and comments from motorized recreationists are dismissed. 4.The purpose and need developed by the agency should adequately address the needs and significant issues associated with motorized recreation.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Berry	Scott	N/A	Purpose and need	Agency affirmation that increasing forage for domestic grazing shall not be used as the purpose and or need for any proposed action.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Clayson	Dirk	N/A	Purpose and need	I would like the see something in the purpose and needs statement to include preserving historical ranching and grazing activities, managing landscapes for sustainable fire controls, removal of excess pinion and juniper, seeding projects etc.	N/A
Clayson	Dirk	N/A	Purpose and need	Purpose and need should include development of recreation areas in the front country, such as mountain bike trails, both regular and E-Bike.	N/A
Spotts	Richard	N/A	Purpose and need	The BLM purpose and need statement should include the dominant importance of protecting and restoring monument objects as required by the Biden GSENM Proclamation and Antiquities Act.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Purpose and need	4. Protect cultural and historic resources... Add: to ensure neighboring communities and local residents ability to access and use traditionally sacred places and landscapes. Escalante was listed as an Endangered Community because it depended on nearby natural resources. We recommend that a section in the new plan give priority and emphasis to protecting historic and traditional community access. That writing the new plan expressly acknowledges and protects the right of communities and local cooperatives, cattlemen, miners and drillers, irrigation companies (NEIC), and law enforcement, school members, to access and improve watersheds, communication and electrical grids and protect places of trash collection, water sources, sewage disposal.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Jackson	Thomas and Marilyn	Star Ranch LLC	Purpose and need	I. Paragraph 3: "GSENM objects and values, including the diversity of ecotypes, as well as the diversity of geological and paleontological resources, DOMESTIC ANIMALS, WATER SOURCES, vegetation, and wildlife. In August of 2018, Matt Betenson recalled, "One of the reasons for downsizing the Monument in the first place was prioritizing monument values, not only for safety of unfamiliar travelers, but for the protection of those areas with special significance. After many thousands of dollars have been spent trying to identify the best ways to manage significant sites, BLM has only proven that the boundaries of the Grand Staircase were much too large, too cumbersome, too diverse and were only drawn to thwart Utah's legal authority." Oil, gas, coal, titanium, zirconium and other minerals are needed if we are to have cars that we have become accustomed to. Producing plastics, molding metal into tires and plastics into windows would disappear. Escalators and Elevators for skyscrapers are made from metal, which comes from ore mined from the earth-where it exists. Metal ore is not found everywhere in large quantities. Millenials ignore the base products when making decisions because they have been taught that hamburgers come from drive-up windows, and milk from bottles at the store.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Purpose and need	In Southern Utah the sentiment is expressed that the meaning of THIS ENTIRE ANALYSIS PROJECT is not to open more public lands to the public, but rather to LIMIT ACCESS of local communities and SIDE STEP local leaders!	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Purpose and need	V. Conclusion In summation, the citizens of Garfield County and Kane County, as well as the State of Utah as a whole, will continue to benefit as the BLM fulfills its mission to promote the sustained yield and multiple-use of Utah's public lands. As an overarching goal, "the State of Utah supports the wise use, conservation, and protection of public lands and their resources, including well-planned management prescriptions."(152) Thus, "it is the State's position that public lands be managed for multiple-uses, sustained yields, prevention of waste of natural resources, and to protect the health, safety, and welfare of the public. It is important to the State economy that public lands be properly managed for fish, wildlife, livestock production, timber harvest, recreation, energy production, mineral extraction, water resources, and the preservation of natural, scenic, scientific, and historical values."(153)	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Purpose and need	Here, the State would encourage the BLM to do just that and clarify exactly what the "main purpose" will look like in application, particularly as it relates to other uses of the land such as grazing and outdoor recreation.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Snyder	Shannon	U.S. EPA Region 8	Purpose and need	Purpose and Need EPA recommends the Draft EIS for the proposed plan clearly identify the underlying purpose and need (40 CFR § 1502.13). The purpose and need should be a clear, objective statement of the rationale for the proposed action, as it provides the framework for identifying plan alternatives. The purpose of the proposed action is typically the specific objective(s) of the activity and is essential for defining the range of alternatives to be considered for the plan. The need for the proposed action may be to eliminate a broader underlying problem or take advantage of an opportunity.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Planning criteria	The agency should adequately consider the human environment. NEPA was intended to protect and promote all environments equally. The depth and breadth of analysis of the Human Environment should be equal to that of the Natural Environment.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Planning criteria	The agency's management plan should adequately recognize that humans and their needs are different and diverse.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Popejoy	Mike	Grand Canyon Trust	Planning criteria	Land use plans for monuments must analyze and consider measures to ensure that objects and values are conserved, protected, and restored and include specific and measurable goals and objectives for each object and value and generally for the Monument or NCA, as well as management actions. BLM Manual 6220, National Monuments, National Conservation Areas, and Similar Designations. Goals are statements of desired outcomes. Objectives are usually quantifiable and measurable and may have established timeframes for achievement. Management actions are the actions anticipated to achieve desired outcomes (i.e., the goals and objectives). BLM Land Use Planning Handbook, H-1601-1 (2005).	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Planning criteria	Planning Criteria 2: These reserved lands do not follow general multiple use direction in FLPMA, but should only allow compatible uses. Multiple use which encourages a range of uses in balance with possible habitat degradation is inappropriate for lands within the Monument as noted earlier in these comments. Only uses and actions that are compatible with the protection of Monument objects and values are allowed.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Planning criteria	Planning Criteria 3: Use and management should prevent new or increased impairment of objects and values. In practice, BLM must define a measurable threshold that determines when a use or action impairs an object or value. Continued use of earlier impaired sites may occur where such use is important for a "reawakening of conservation efforts" and to provide "visitors with an opportunity to experience a remote landscape rich with opportunities for adventure and self discovery." (Proclamation 10286). Vehicle use on maintained Monument roads is one example. Short-term small-scale impairment may be part of conservation efforts to restore objects. Where impairment is large in scale and constitutes significant degradation of an ecologically important object or value, management should remove the impacting cause and initiate recovery even if this requires a long-term process. Changes in grazing management to restore biological soil crusts provides a good example.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Planning criteria	Planning Criteria 4: In consultation with the GSENM affiliated Tribes, BLM shall ensure the protection of recognized traditional uses consistent with other planning criteria and in accordance with the purpose of this Monument.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Planning criteria	Planning Criteria 5: Adaptive management in this plan should ensure the protection of this Monument's objects and values. The Department of the Interior defines adaptive management in the DOI technical guide as follows: Adaptive management [is a decision process that] promotes flexible decision making that can be adjusted in the face of uncertainties as outcomes from management actions and other events become better understood. Careful monitoring of these outcomes both advances scientific understanding and helps adjust policies or operations as part of an iterative learning process. Adaptive management also recognizes the importance of natural variability in contributing to ecological resilience and productivity. It is not a 'trial and error' process, but rather emphasizes learning while doing. Adaptive management does not represent an end in itself, but rather a means to more effective decisions and enhanced benefits.4 4 Williams, B.K., R. C. Szaro, R.C., & Shapiro, C.D. (2009). Adaptive Management: The U.S. Department of the Interior Technical Guide. Adaptive Management Working Group, U.S. Department of the Interior, Washington, DC, pg. 4. 5Ibid. This technical guide also notes that adaptive management "meets environmental, social, and economic goals, increases scientific knowledge, and reduces tensions among stakeholders."5 In the past many social and economic goals were inconsistent with protection of Monument objects and values. The plan should make clear that these goals must also comply with protecting Monument objects and values.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Planning criteria	Planning Criteria 6: All actions should ensure that the Desired Plant Community is protected. In order to protect the objects and values of this Monument the Monument plan should define the Desired Plant Community (DPC) as that which represents the native natural plant community that resembles the historic climax plant Community or conditions at their natural ecological potential. National and state ecological standards require BLM to describe the DPC for a site. For this Monument the ecological site description presents contents and characteristics of the climax plant community specific to identified soil map units. The Desired Plant Community is represented by the frequency, diversity, density, age classes, and productivity of the native plant species in the Community.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Planning criteria	Planning Criteria 1: The Monument's Proclamation reserves these lands for conservation purposes. This reservation alters a number of legal criteria that would otherwise be applicable.	Appendix B - RNA Proposals.pdf
Weppner	William	N/A	Planning criteria	6.GSENM, BLM, and the Department of the Interior management need to communicate and cooperate with local, rural First Responder organizations, on which they depend. Every time Escalante Fire & Rescue or Garfield County EMS #506 is paged to respond to a Calf Creek emergency, the residents of Escalante, UT are left with no First Responders. There is a 26 year history of the GSENM incidents that never gets used to help identify and mitigate the risks to public safety and the burden it places on volunteer first responders.	N/A
Berry	Scott	N/A	Planning criteria	Criteria for measuring degrees of protection . Unfortunately, the MAS does not describe quantitative or qualitative criteria for measuring the extent to which the mandated level of protection would be achieved. Instead of using qualitative or quantitative criteria, the agency employs a "heuristic" approach, predicting potential future impacts in "more or less" terms. Each alternative describes a selective suite of land uses, which is then combined with a "more or less" description of anticipated changes to each use within a given alternative. Problematically several of the proposed preliminary alternatives focus on possible changes to "discretionary" uses within GSENM, which have no direct relationship to the protective purposes mandated in Proclamation 10286.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
J	A	N/A	Planning criteria	Include language that addresses visitor/cattle conflicts. As recreation use increases in particular areas (like Phipps Wash), criteria for removal of such allotments from regular or emergency use should be described. Include descriptions of allotments available for scientific, emergency, and/or other reserve uses and the flexibility of turning existing allotments into those needed for such purposes. Retired allotments should still be visited on a long-term monitoring basis to determine whether future remediation may be necessary to promote ecological function and habitat worthy of future native flora and fauna. Describe criteria that will be used to allow for or restrict range improvements, change grazing practices, or dictate restoration practices. My preference would be no grazing at all or have it restricted to very few places. Supplementary adaptive management tools for rangeland health and grazing management need to be adopted under conditions of drought. Develop criteria for addressing climate change and seasonal drought effects on long-term vegetation community changes, but not on forage.	GSENM_20220923.docx
Berry	Scott	N/A	Planning criteria	Quantitative criteria for measuring degrees of protection are available. Ecology and conservation science have developed quantitative, objective criteria for measuring ecological and environmental health which typically focus on the presence and rate of change in the components of specific ecosystems; species presence, distribution and rates of change; the distribution of soil types and rates of change; changes in habitat availability for proxy species, vegetation patterns and distributions, population and community structures, and change is fundamental water, carbon, and energy cycles. Without an explicit description of these or similar criteria, no logical basis exists for relating a proposed alternative to meeting the protective purposes that GSENM was created to serve.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
J	A	N/A	Planning criteria	SCIENCE: The Colorado Plateau desert ecosystem is more sensitive than other environments and should be treated as such - grazing, off-road vehicle use, existing mineral extraction, and heavy visitation are activities that must be scrutinized intensively and limited where they might lead to degradation of resources. This plan should reveal a peer-reviewed, evidence-based, appropriate level of scrutiny. Science should be strongly highlighted as a driver of adaptive management. Demonstrate your extensive understanding of ecological connectivity. Avoid vague language. If you can't be specific about something, provide a matrix for determination or explicit lists of considerations. Be mindful of where you might need to say that science doesn't yet know what's going on here, but where you'll look for indicators that may reveal further study needed.	GSENM_20220923.docx
Berry	Scott	N/A	Planning criteria	The proposed preliminary alternatives must be redesigned to describe how anticipated land uses in GSENM will result in variations to established measures of ecological health, and abandon analytical approaches that depend on a guess work approach that camouflages an unacceptable degree of agency discretion.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Planning criteria	As such, the State has concerns with the expedited process that this GSENM RMP planning process is subjected to, as it will likely not accomplish the goals thus stated.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Goreham	Dennis	Wasatch Mountain Club	Planning criteria	The process should be well defined and broadly communicated. There are so many different reasons for visiting the Monument including science, education, hiking, 4WD touring, mountain biking, horse riding, bird watching, etc. and all these people should have a say in the plan development. The BLM must maintain transparency in this process and keep the public informed about what they are learning and where they are heading. The RMP and EIS should address preservation, recreation, and economics at a minimum.	GSENM WMC comment 09182022.doc
Goreham	Dennis	Wasatch Mountain Club	Planning criteria	The process should be well defined and broadly communicated. There are so many different reasons for visiting the Monument including science, education, hiking, 4WD touring, mountain biking, horse riding, bird watching, etc. and all these people should have a say in the plan development. The BLM must maintain transparency in this process and keep the public informed about what they are learning and where they are heading. The RMP and EIS should address preservation, recreation, and economics at a minimum.	N/A
Murray	Michael B.	Coalition to Protect America's National Parks	Alternatives	The National Parks Conservation Association and the Coalition to Protect America's National Parks urge you to choose the most protective management alternative for the monument; one that recognizes Tribal communities and the millions of people who have expressed support for and care about these places, while ensuring healthy national parks and monuments and a vibrant, sustainable tourism economy. We ask BLM to move forward with a plan that embraces this "exceptional and inimitable landscape filled with an unparalleled diversity of resources."23 in a manner that protects neighboring national parks, is consistent with existing law and preserves our natural and cultural history. 23 Pres. Proc No. 10286, 86 Fed. Reg. 57,335 (Oct. 8, 2021).	NPCA & Coalition GSE RMP scoping FINAL.pdf



Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Shu	Lyn	Highway 84 LLC	Alternatives	Of the Seven Alternatives offered, 7.2 of no change is okay, but there is no alternative which ADDS MULTIPLE USES back into the equation, or OPENS ACCESS to some of the greatest scenery in the World. Plans, budgets and goals should include keeping an all-weather road from Escalante to Wahweep Marina, from Cannonville to Lake Powell, and from Boulder to Hite Marina.	N/A
Shu	Lyn	Highway 84 LLC	Alternatives	7.2 of No action is probably preferred, but 7.8 Additional potential alternative that restores multiple uses and opens opportunities for communities to utilize renewable resources would be preferred.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Alternatives	Comments from local Expert Witnesses should be given more credibility. We join local citizens who vehemently oppose adding acreage back into the Monument. But, as we have spent time and energy putting these comments together, we began to realize this, too, puts a tremendous burden on local residents! Not only are we small in number, but busy this time of year with harvesting and the beginning of school. On the other hand, GSENM- BLM, Forest Service and National Park, employees are generally young transplants who, although educated away from this area, are transferred often and do not have roots in ranching. A scientific approach should be balanced with historic ranching and multiple uses.	N/A
Popejoy	Mike	Grand Canyon Trust	Whole alternative proposed	Additionally, the 2020 GSENM management plan does not encompass new objects included in Proclamation 10286, or tribal input as required by Proclamation 10286. Proclamation 10286 includes several new objects that were not included in Proclamation 9682 including but not limited to the entire Grand Staircase-Escalante landscape, pristine night skies, natural soundscapes, and rare species of bees. Proclamation 10286 also provides for greater recognition of tribal connection to the GSENM, including provisions specifically providing for protection of sacred sites, and allowing for gathering of traditional plants and medicine. These differences between Proclamation 10286 and Proclamation 9682 are significant. Accordingly, the 2020 management plan which is developed pursuant to Proclamation 9682 would require extensive revision to be in compliance with Proclamation 10286. The Agency should replace Alternative B with an alternative that satisfies the purpose and need of protecting objects and values pursuant to the direction in Proclamation 10286. While Alternative B should not be analyzed in detail it should be included in the EIS as an alternative considered but eliminated from detailed analysis for failure to meet the purpose and need of the RMP.	Appendix B - RNA Proposals.pdf
Berry	Scott	N/A	Whole alternative proposed	Preliminary Alternative F is proposed as a useful analytical tool, rather than as a pathway to an immediate future condition. A fair review of the AMS demonstrates that grazing throughout GSENM is by a large margin the dominant factor impacting the ecology of GSENM. One major purpose of the "alternatives" method is to explore in depth how hypothetical management changes to the grazing regime would affect criteria for measuring ecological health. It would be a useful and informative step for the agency to analyze on a hypothetical basis how a gradual reduction in grazing at GSENM would impact all the components of the socio-ecological system, including human community impacts, including suggestions about how community impacts could be mitigated. Granted, a full presentation of this topic is likely beyond the in-house resources available to the agency, and the task would best be contracted out to a professional panel of scientists, economists, and other recognized experts.	RAD Management (2).pdf
Berry	Scott	N/A	Whole alternative proposed	Proposed Preliminary Alternative G. The Visitation Management Alternative. i.The Current Situation. The MAS recognizes that visitation and recreation impacts to GSENM are accelerating. While all parties recognize that visitation is now and will continue to be important and valued at GSENM, developing practical ways to reduce and mitigate visitor impacts is a challenge that should be addressed now. ii.Alternative G should be used as the analytical home for exploring how various sorts of visitation management techniques might be used at GSENM, considering all the techniques now being used at national parks throughout the West. Initiating the investigation of this subject at GSENM as part of the RMP process will better prepare the monument for the pressures and concerns of the future.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Jackson	Thomas and Marilyn	Star Ranch LLC	Whole alternative proposed	7.3 - This alternative CLOSES, RESTRICTS, and ELIMINATES Multiple uses. We disagree with the statement, 'These areas may be closed or limited to discretionary uses that are not consistent with the purposes of the Research Natural Area (RNA). This is open-ended statement, without guidelines of who, what, when, where, why, how 'discretion' will be used, and does not allow the public to comment or prioritize the individual acts' importance. For Example: A population of Horse Flies is found, so the area is closed indefinitely to study the reproduction of Horse Flies, while the horse that is the host of the fly is eliminated! This Alternative does not mention the fact that including more lands in the management plan, should open more lands to timber harvest, mining, livestock grazing, oil production which have been historically compatible practices, not less. With very little exception, studies should be performed as an added use, only if it's compatible with existing uses. In no way, should a study take precedence over existing public rights, leases, permits or historic uses. Usually, months of preparation and planning took place before management decisions are made, and the same opportunity to comment on scientific studies should be allowed to the public, especially if it involves changes or interruption of historic use or access. It should also include the fact that after the study is complete-and it must have an ending date-there must be credible evidence if land is not returned to its prior condition before the study. The importance of the science being studied must be weighed with the importance of the current use and management, as well as the safety of the traveling public, as it may be possible to conduct the study in another place and not interrupt or prohibit travel and sightseeing, which is a main purpose for the Monument designation.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Whole alternative proposed	7.4 Alternative B effectively closes OHV use instead of planning areas compatible with it. Primary and Secondary routes COULD be maintained and improved ---should read WILL be maintained and improved, after all, these routes should BENEFIT THE PUBLIC, WHO ARE THE TRUE OWNERS! In millions of acres, there should be a few which are compatible with any human activity. There is no mention of the need for planning for future corridors for Wi-Fi, electrical charging stations, solar power stations, wind energy production, or hydro power, which can effectively be managed from smaller vehicles like ATVs.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Jackson	Thomas and Marilyn	Star Ranch LLC	Whole alternative proposed	7.5 Alternative C emphasizes recreational opportunities but virtually ignores support systems of restrooms, sanitation, RV parking, interpretative signs, as well as maintenance and grooming of roads and trails. Experienced Trail guides with credible references should be stakeholders in private and commercial ventures. "AUMs on certain available allotments may be reduced" should include reducing competitive species of deer, antelope, elk, and big horn sheep to the original numbers when the Monument was created. It should also read that BLM employees, vehicles, and travel will be no greater than 1996 numbers when the Monument was created; if, in fact, it is returned to that size. A toll or tax will be imposed by Garfield and Kane Counties, as with any other property assessment, for numbers of Federal employees or Federal vehicles, as it requires more emergency response teams and more community infrastructure to support them. At no time, should GSENM employees be able to have more access than the public, who own the land. We challenge GSENM to name any reason why administration should have any more access or any other use than the United States public. There is no activity that administration can do which will improve the land; they can only regulate people! This alternative eliminates the opportunity to replace and repair historic corrals, fences, or cattleman line shacks and ignores the 'world-class outdoor recreational opportunities' that observing and learning lifestyle skills of ranching, producing sawed timber, or processing minerals could offer. As these activities are currently compatible, any alternative should include maintenance of all-weather trails and further include uses of ice-fishing, communication and emergency services, as well as corridors for law enforcement and winter sports.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Whole alternative proposed	7.6 Alternative D allows discretionary uses in four zones, front country, passage, outback and primitive. These boundaries ignore the fact that major airline routes cross this area, new technology such as drones and satellite imagery needs some new infrastructure. Increased water development, sanitary stations, weather stations, and camping sites should be part of all places people are lured in to see, as bodily functions of humans should be an underwritten primary stewardship responsibility. If this Alternative is chosen, Garfield County and Kane County should have discretionary authority as to whether to or whether not to be responsible for emergency services without an ambulance-worthy road.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Whole alternative proposed	7.7. Alternative E proposes limiting and/or discontinuing discretionary uses! This is terrible!!!! Basically, the government is shutting out the public and closing it. It would be our recommendation that the BLM be restricted to hiring local residents with at least one generation of history on the GSENM. That no policy be written to exclude uses which have existed and are compatible with the landscapes.	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Whole alternative proposed	BLM should develop an alternative that allows full vehicle and equipment access for wildlife protection and conservation.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Campbell	Todd	University of Tampa	Whole alternative proposed	As a group, our preferred alternatives included B, D and E, with the differences being due to the nature of the future impacts that might result from Discretionary Activities. If we had to pick a single alternative, we vastly prefer Alternative E because the Discretionary Activities would be reviewed on an as-needed basis, allowing for some stakeholder opportunities while also preserving the majority of the GSENM.	N/A
Clayson	Dirk	N/A	Component of alternative proposed; recreation	All biking should include class 1, 2 and 3 E-Bikes.	N/A
Murray	Michael B.	Coalition to Protect America's National Parks	Component of alternative proposed	Visual Resource Management and Viewsheds The Colorado Plateau is a vast, wide, open landscape that affords incredible views across the mosaic of public lands, in some cases 360-degree views for a hundred miles without any visual intrusion from development. Public land management boundaries are indistinguishable to most visitors. Part of the unique experience of visiting this remote area of Southern Utah is the opportunity to seemingly travel back through time to imagine our lands as seen by the first inhabitants. From Bryce Canyon's rim, visitors can look east over hoodoos and to the Monument beyond to unspoiled lands and geological features of Grand Staircase. "The location of the park at the summit of the Grand Staircase, surrounded by a system of nationally protected lands, and combined with the exceptional clarity of the air and natural quiet, provides a multisensory experience. The outstanding views often extend more than 100 miles and begin with the colorful and intricately carved Claron Formation and include panoramic vistas of cliffs, canyons, and forested landscapes." Bryce Canyon Foundation Doc. at 8. These unspoiled views have been preserved because the GSENM has long been under federal protection and because there was little development in this remote area prior to Proclamation 6920. As a national monument, there should be no alternative analyzed in the DEIS that considers managing the planning area as VRM Class III or IV. We urge the agency to do its utmost to ensure that high quality conditions are preserved in areas visible from Bryce Canyon, Capitol Reef and Glen Canyon, as well as viewpoints in the monument.	NPCA & Coalition GSE RMP scoping FINAL.pdf
Ott	Klancy	N/A	Component of alternative proposed	let's go back to the original. When the monument was first made in 1996 in an address by President Clinton stated " we need to protect our values and preserve our national heritage. President Clinton proclaimed in the original proclamation that the Grand Staircase Escalante National Monument would not affect multi-uses hunting fishing hiking camping and grazing " Keep the land open to multi-use	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed	The BLM should avoid management prescriptions that make it difficult or impossible to conduct traditional and essential activities in the planning area. The BLM should avoid land-use restrictions that impede the activities of local citizens, state officials, cattle grazers, and others from engaging in traditional activities on the land such as mending fences and other rangeland improvements, collecting firewood, cutting Christmas trees, providing water, clearing brush, and saving lives through emergency medical services (EMS) response and search and rescue.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Griffin	Simone	BlueRibbon Coalition	Component of alternative proposed; recreation	The BLM should recognize the value that connecting with nature through dispersed camping and recreation brings. Restricting this form of recreation and limiting areas of use will only increase impact. We recommend adopting dispersed camping standards within this plan to require public input for any dispersed camping closures.	GSENM Resource Management Plan Scoping.docx-2.pdf
Painter	Michael J.	Californians for Western Wilderness	Component of alternative proposed; recreation	We support continued dispersed camping in the Monument and do not wish to see more campgrounds developed.	N/A
Painter	Michael J.	Californians for Western Wilderness	Component of alternative proposed; recreation	While recreation and public access are important values in themselves, they must never take priority over scientific resources and landscape protection. The best way to ensure this is to take a proactive approach to protection, drawing on previous experience in the Monument and other areas around the West, as visitation has exploded in recent years.	N/A

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Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	Multiple-use also provides for the needs of physically challenged visitors including the elderly and veterans who must use wheeled vehicles to visit public lands. These multiple-use visitors use roads and motorized trails for their recreational purposes and the preferred alternative and decision should adequately consider motorized designations serve many recreation activities, not just recreational trail riding. We have observed and documented that 98% of the visitors to our public lands are represented by the activities discussed above. Ninety-eight percent of the visitors are there to enjoy activities associated with motorized access and motorized recreation.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	.Develop a Reasonable Alternative to Address the Public's Need for More Motorized Access and Motorized Recreational Opportunities	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	.Multiple-use also provides for the needs of physically challenged visitors including the elderly and veterans who must use wheeled vehicles to visit public lands. These multiple-use visitors use roads and motorized trails for their recreational purposes and the preferred alternative and decision should adequately consider motorized designations serve many recreation activities, not just recreational trail riding. We have observed and documented that 98% of the visitors to our public lands are represented by the activities discussed above. Ninety-eight percent of the visitors are there to enjoy activities associated with motorized access and motorized recreation.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	.The agency should adequately consider that the project area is used extensively by elderly, handicapped, disabled and veterans and motorized closures significantly impact this user group.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	.The Agency should adequately identify and consider the needs of motorized recreationists and OHV recreationists including those motorized recreationists that the process does not comfortably accommodate and reasonably provide for those needs.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	Consideration for motorized trail riding opportunities for the disabled, elderly, and veterans should be given a hard look.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	Develop a Reasonable Alternative to Address the Need for Motorized Access and Motorized Recreation for the Elderly, Handicapped, and Disabled	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	Develop a Reasonable Alternative to Address the Need for Motorized Access and Motorized Recreation for Youth	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	e agency should adequately consider reasonable alternatives that would adequately provide motorized opportunities that adequately meet the needs of the elderly, disabled and veterans.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	Every road and trail is important to some individual for some purpose. Each motorized road and trail should have adequate site-specific analysis to determine all of its values including motorized recreational value.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	Every weekend we talk to fellow motorized recreationists and they ask us where they can go to ride trails and camp in dispersed areas. The agency should adequately consider that the public has been squeezed into too small of an area with too few motorized routes.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	he agency should adequately consider that all potential negative issues associated with non-motorized and motorized recreationists can be mitigated by education and that education of all visitors should be used as an alternative to closure.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider alternatives that would adequately provide motorized opportunities to replace the closure of opportunities close to town.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider an alternative that would maximize recreation opportunities in proportion to the needs of actual visitors to the project area.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider and carry forward an alternative that would provide a reasonable level of motorized trail opportunities to meet the existing and future needs of OHV recreationists.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider and understand the needs of motorcycle single-track recreationists and adequately provide for those needs.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider that a healthy human environment includes adequate motorized access and motorized recreational opportunities as required to meet the needs of the public.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider that all potential negative issues associated with non-motorized and motorized recreationists can be mitigated by education and that education of all visitors is a better alternative than closure.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider that Anti-mechanized interests are not free of mechanized. They use vehicles in their daily lives. However, anti-mechanized interests choose to impose their level of mechanized use on others.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider that E-bikes have become popular in the last 5 years including: a.E-bikes have significant positive impacts on the human environment. b.E-bikes do not have any greater impact on the natural environment than mountain bikes. c.E-bikes should be allowed on all non-wilderness trails.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider that education can be part of creating new motorized recreational opportunities.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider that motorized access and motorized recreation are the #1 use of the project area.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider that motorized recreationists now include e-bike enthusiasts who have been excluded from sharing hiking, walking and mountain bike trails.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider that the evaluation and decision should consider the acres per wilderness visitor (3% of the observed visits) versus acres per motorized visitor (97% of the observed visits).	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider that the public needs to be able to camp and picnic using at least a 300-foot setback from roads for the safety of children and pets and health (dust).	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider that the public prefers dispersed camping spots and that is consistent with the need for social distancing.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider that there is an inadequate number of dispersed camping spots in the project area and the preferred alternative should address this significant issue.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider that youth need motorized recreational opportunities that are relatively close to town.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider the full recreation opportunity spectrum for motorized recreationists including e-bikes, e-motorcycles, singletrack motorcycles, ATV, SxS, 4x4, and automobile.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately consider the need for RV friendly campgrounds, rehabilitated campgrounds, new campgrounds, and existing and new dispersed camping opportunities in the project area in order to meet the needs of public.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The Agency should adequately identify the needs of the silent majority including motorized recreationists and OHV recreationists and reasonably provide for those needs.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should adequately recognize that closure takes away needed motorized recreational opportunities and education in place of closure can be used to address issues with existing motorized recreational opportunities.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; recreation	The agency should not create non-motorized recreational opportunities by taking opportunities from motorized recreationists.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Gagner	Paul	Dreamland Safari Tours	Component of alternative proposed; recreation	Priority needs to be made to clean-up de facto campgrounds on hwy 12 and Hole-in-the-Rock Road.	N/A
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	BLM should return to the same general management zones and descriptions for Grand Staircase-Escalante National Monument that existed for decades following the original Monument Management Plan. These zones, their boundaries, and two decades of management are already in place, and can easily be re-applied to existing, on-the-ground conditions which still closely reflect management under these original Management Zones. 2000 MMP at 8-9, including maps. The new MMP should make clear that future designations and actions would be based on the goals and objectives for each zone. If BLM decides to designate new zones, the Agency should consider the following: 1.Passage Zone: special areas on the urban interface where the primary activities are non-motorized trail activities, yet there is a need for recreational and passenger vehicles to travel through to access other zones, internal trail heads, or for administrative purposes. These areas will have a high level of administrative control, including speed limits, and may further restrict vehicles to travel to only passenger vehicles or authorized uses. These areas are highly visible and serve a variety of non-motorized experiences at medium to high densities often while protecting special resources. Emphasis in these zones is on highly developed, well planned and designed non-motorized trail systems. The density of motorized use routes would be very low. 2.Outback Zone: are special non-wilderness backcountry areas that serve quiet non-motorized recreation in a primitive setting where visitors may enjoy a less developed recreational experience. These areas generally have sensitive resources; therefore, non-motorized trails in these areas will have a low to medium density. 3. Primitive Zone: are lands with wilderness characteristics and other highly sensitive ecological areas where there will be no motorized routes or travel permitted. Evidence of administrative control should be little to none. Non- motorized routes are generally undeveloped, and areas are generally accessed by foot or horseback.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	Objectives - Establish management zones to identify areas where recreation improvements and facilities could be developed or expanded to meet future recreational needs. - Accommodate recreation where appropriate by providing minor recreation facilities for visitors. Major visitor facilities will be located in surrounding communities in order to protect resources and promote economic development in the communities. - In collaboration with Tribes, provide visitor services, including interpretation, information, and education. - Manage the Monument to provide for the proper care and management of natural quiet, dark skies, and naturalness that enhances recreational experiences. Management Actions	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	Recreational Use and Visitor Services - Proposed Alternative Components Goal 1 Recreation will be managed to facilitate specific recreational experiences while ensuring continuing and future protection of Monument objects and values.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-1: Recreation allowances, developments, trails, parking, and concentrated use areas will be determined by GSENM's management zone system-BLM will work collaboratively with Tribal Nations to develop appropriate recreation plans for GSENM.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-10: Within passage and outback zones outside of developed campgrounds, dispersed camping will be managed to "designated dispersed" sites only, which will be chosen and marked based on their lack of impact to Monument objects and values.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-11: Require use of portable toilet systems and fire pans at designated dispersed campsites.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-12: Group size will be limited to 25 people in the Passage and Outback Zones.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-13: In the Primitive Zone, group size will be limited to 12 people and 12 pack animals.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-14: All motorized and mechanized travel within the Monument will be limited to designated routes.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-15: No camping within 200 feet of springs and water improvements to allow space for wildlife and livestock to access water.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-16: Ropes and other climbing aids will not be allowed for access to cultural sites (including archaeological resources), except for emergencies or administrative needs, or at the request of tribal members.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-17: Camping will not be allowed within areas of identified cultural resources (including archaeological resources).	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-18: Maintain visitor use areas and boundaries at existing Public-Use cultural sites to prevent social-trailing and damage to cultural resources.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-19: Air tours, air shuttles, and other commercial takeoff and landings will not be allowed.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-2: Special events may be approved, under permit, if the event meets other zone requirements and Plan provisions.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-3: Special events will be permitted in accordance with the requirements of the most restrictive zone that the event encounters.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-4: No competitive events will be allowed.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-5: All recreation facilities and parking areas will be designed to be unobtrusive and to meet the visual resource objectives.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-6: Create signage and interpretive panels at roadways and Public-Use cultural sites for user education.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-7: Create signs and placards to identify culturally significant plants in developed recreational areas.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-8: Campfires will be allowed only in designated fire grates, designated fire pits, or mandatory fire pans in passage zones. In the outback and primitive zones, fire pans are strongly encouraged.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; recreation	REC-9: Campfires will also be prohibited in archaeological sites, rock shelters, or alcoves Monument-wide. Exceptions may be made for Native American traditional and ceremonial purposes.	Appendix C - ACECs.pdf
Waggoner	Nathan	Grand Staircase Regional Guide Association	Component of alternative proposed; recreation	Backcountry Zone This should include all of the Primitive Zone as well as roadless zones in the Outback Zone. It should be the majority of the National Monument. As stated in section OG-1 of the original monument plan, "outfitters and guides should be allowed throughout this region." The larger the area we are permitted on, the more we can spread out the public and reduce impact on the landscape. Guides in this region should be seen as trip facilitators and educators. They should help the public understand how to travel in remote regions by using LNT, Tread Lightly and accumulated knowledge from previous experiences. This region should have a maximum 1:12 guide to client ratio. We also think that guides should be excluded from the 12 person group size limit because this has become an issue in regions that have been allocated and subjected to public permit lotteries. The guide should be seen as a facilitator and educator, not as a liability to the sensitive locations. By employing guides in backcountry regions the BLM should recognize that we are there to protect the regions for future visitation, not to exploit the natural resources or to corrupt the wilderness experience.	Grand staircase regional Guide association scoping.docx
Waggoner	Nathan	Grand Staircase Regional Guide Association	Component of alternative proposed; recreation	Gateway Communities This zone should be dedicated to accessing our gateway communities as well as resource gathering. It should represent a fraction (<3%) of the Monument, but it should constitute the vast majority of interpretive resources and funding. Over the past 25 years, we have seen the funding for the Monument wane. An unforeseen consequence of this is that our communities have been able to assist in visitation services not seen in our funded National Park Systems. We believe this should be embraced in the new management plan. Training, signage, and backcountry travel conditions should be available to storefronts, guide services, and private establishments along the Highway12 and 89 corridors. The more we can rely on the private institutions to assist in visitor services, the more we can relieve the BLM and allow them to concentrate on the science mission of the Monument and the protection of the items of antiquity listed in the new proclamation. BLM visitor service facilities and staff are vital to the frontcountry aspects of the Monument and we would like to see them funded and expanded in our communities, but we would like to help with their responsibilities through continued education and collaboration. Possible aspects of this initiative might include: 1)Public training symposiums 2)LNT, Tread Lightly, and interpretive signs for storefronts and guide services 3)Hire a community/county liaison to work with the community and local guide services 4) Designate private, locally owned businesses to issue backcountry permits and explain stipulation of travel in SRMA designated regions 5)BLM maintained resources online to inform businesses of specific conditions and issues that need to be related to the public 6)Coordinate with local entrepreneurs, businesses, and guide services to build and maintain museums located in our communities to highlight the science conducted on the Monument 7)Promote, rely on, and train local guide services to conduct interpretive tours on the Monument 8)Facilitate collaboration between researchers and local businesses so we know the most up to date science being conducted on the Monument All of these initiatives bring the outdoor industry to our communities and form an invested interest between the communities and the BLM. In return, the communities will gain a deeper understanding and appreciation for the National Monument. If the Monument is highlighted as a driving force in the enrichment of the gateway communities, they will strive to protect it as a viable commodity, and they will protect it for future generations.	Grand staircase regional Guide association scoping.docx
Waggoner	Nathan	Grand Staircase Regional Guide Association	Component of alternative proposed; recreation	Use of Recreational Livestock: Recreational Livestock should be allowed throughout the monument because of its historical and practical relationship to the landscape. Horses have always been a popular mode of travel and a necessary tool for getting equipment into the backcountry. Since the majority of the monument is in the Backcountry Zone, horses are indispensable for getting members of the public with physical limitations into regions they can enjoy. They are also essential for assisting in the science conducted in the backcountry. There are large sections of the monument that are wilderness study areas and the only way to get transacts, monitoring equipment, and other tools used in scientific research is by horseback. We hope that horses and packstock are allowed throughout the monument because they are quiet modes of transportation and are a positive addition to the wilderness characteristic promoted on the proclamation. The public and guides should be able to use packstock on the monument if they follow horse LNT regulations and utilize weed free hay.	Grand staircase regional Guide association scoping.docx
Waggoner	Nathan	Grand Staircase Regional Guide Association	Component of alternative proposed; recreation	All forms of approved outdoor recreation should be permitted by guides and outfitters on the National Monument. This should include but not exclude day hiking, overnight trips, canyoneering, hunting and fishing, trail running, rafting, horseback riding and the use of pack stock, as well as coordination of social events and commercial filming and photography. The BLM should work with the guide community to streamline special events and commercial filming opportunities. Filming is cumbersome and a strain on the BLM staff and the guiding community could help expedite this process by helping to facilitate these events. We could be liaisons for the BLM to ensure these operations are conducted in a manner that reduces impact on the landscape.	Grand staircase regional Guide association scoping.docx

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Weppner	William	N/A	Component of alternative proposed; recreation	As popularity for outdoor recreation grows, the BLM should be looking at ways to provide reasonable access that will sustain the growing numbers of visitation. Often agencies try to address increased use through closures, restrictions, and reservation systems. Each of these approaches is inferior since they create a scarcity of access, which concentrates use in remaining areas. BLM should plan for opening more areas, routes, and amenities to accommodate increased public demand to utilize public lands. Furthermore, recent studies are starting to emerge that show that reservation systems are discriminatory. BLM shouldn't develop an RMP that plans for the creation of reservation systems.	N/A
Weppner	William	N/A	Component of alternative proposed; recreation	BLM should not adopt standards for regulating organized events and group events on the monument that are arbitrary and capricious. They also should adopt standards in the RMP that don't curtail constitutionally protected rights. For example limiting group sizes to 50 "heartbeats" for a group event with a stated religious purpose is both arbitrary and capricious and a violation of religious freedom rights. BLM should adopt standards that allow for flexibility in permitted events with management practices that accommodate the vast majority of large groups that want to utilize the area.	N/A
Weppner	William	N/A	Component of alternative proposed; recreation	Dispersed camping is a popular recreational activity that also needs to be protected through these plans. Restricting use to designated sites or a specific number of sites is typically arbitrary and not based off best available science. Any user conflicts or possible resource damage can be solved through management solutions other than closure and the BLM needs to implement these practices first.	N/A
Larsen	Hanna	N/A	Component of alternative proposed; recreation	For managing recreation, the BLM should return to using management zones as it did in the original management plan for the monument. The agency should focus any growth and expansion of recreation use and facilities in frontcountry areas, while protecting and minimizing development of less-used, backcountry areas.	N/A
Weppner	William	N/A	Component of alternative proposed; recreation	In April of 2022 the Department of Interior released it's Equity Action Plan which addresses the lack of access on public lands. Recreation, primarily motorized recreation has taken a backseat to conservation and protection. Motorized recreation is often the only way those with mobility impairment disabilities are able to access public lands. Current policies actively discriminate against this group of underserved Americans, and I would like to see BLM help connect all users with public lands. BLM should ensure that the plan complies with the Department of Interior's Equity Action Plan, which recognizes that restrictions on motorized access to public land create barriers of access to those with disabilities.	N/A
Sjogren	Morgan	N/A	Component of alternative proposed; recreation	Limit group sizes to 25 in front country/passage zones and 12 people/pack animals in the backcountry. I often hike solo or with small groups of 2-3 people.	40 Mile Gulch _ 2 May 2020.pdf
Early	John	N/A	Component of alternative proposed; recreation	Please make aviation an allowed and authorized use.	N/A
Veranth	John	N/A	Component of alternative proposed; recreation	Recommendations on viewpoints and short trails. 1)The management plan should have a long-range vision for new viewpoints and short (less than an hour) trails easily accessible from roads. These would serve an increasing fraction of visitors who lack the time and energy for long hikes but are willing to get out of the car. 2)I have provided the Lower Calf Creek Falls viewpoint solely as an example of what is available just along the Highway 12 corridor. Many other similar situations exist in the monument. Again, I am not going to spend time providing detailed lists of possible viewpoints and short trails if the BLM insists on no new trails in WSAs.	Veranth Scoping 926.pdf
Sjogren	Morgan	N/A	Component of alternative proposed; recreation	Special Recreation Permits No competitive events should not be permitted in Grand Staircase-Escalante National Monument. As a former elite trail runner, I can attest that large competitive events can have significant impacts on soils, flora, noise levels, and increase vehicle presence. All of these have the potential to damage monument objects listed in proclamation 10286.	40 Mile Gulch _ 2 May 2020.pdf
Veranth	John	N/A	Component of alternative proposed; recreation	There are many less-visited places in the GSENM that should not be forgotten in the planning. I mention them only briefly to indicate public interest and concern. In general, the past practices for these areas have been appropriate and should be continued. These areas will see increasing recreation use in the future and the management plan should anticipate issues, rather than responding to problems.	Veranth Scoping 926.pdf
Holtry	Rita	N/A	Component of alternative proposed; recreation	We do support the proposed Hiking-biking trail on 8-mile gap road BLM land which adjoins our property- as explained by Dan Gunn BLM planner.	N/A
Marienfeld	Joyce	N/A	Component of alternative proposed; recreation	With its important unique function as a 'conservation monument', the GS-E management plan MUST function to protect these resources. Protection and preservation can/must be encouraged with practices, such as : proactive planning establishing the use of 'management zones', like were in the original plan, being smart about placing recreating areas and facilities use in 'front country' areas..leaving wilderness areas preserved..this only makes simple (and low-cost) sense, I believe; and prohibiting large deforestation projects on this conservation-focused land, destroying the biological crust, ripping out native trees, plants, grasses...essential to the health of the desert ecosystem as a whole - in the name of creating 'benefits' to the areas - which are now known to actually not always be helpful, sound practices.	N/A
Escalante resident	Not Provided	N/A	Component of alternative proposed; recreation	The BLM should develop an overall recreation vision and plan. In the 2000 Management Plan, the vision was to keep GSENM “primitive,” “a frontier,” with few developed trails and amenities. Recently the BLM has begun constructing parking areas, toilets, putting up signs, etc. in response to increased visitor use, but apparently without an overall plan. My point is that the new RMP should create a vision and give direction, not just respond to visitor use.	N/A
Wallace	Katie	N/A	Component of alternative proposed; recreation	, the BLM should consider formalizing some camping along the Hole-in-the-Rock Road, as well as along the Cottonwood Road. Special recreation permits should continue to be given out at a similar rate to current – not curtailed and not expanded. Commercial permit holders who break resource-related stipulations should be given no more than one warning and then should receive a ban of five years to life, depending on the egregious nature of the violation. The Monument has been too light on poorly-performing commercial outfitters for too long.	N/A
Weppner	William	N/A	Component of alternative proposed; recreation	Analyzing more access on the monument would be appropriate for an alternative. These roads, trails and recreation areas are crucial for the local economy for communities such as Escalante and Kanab as well as other small communities that rely on access to the monument. The U.S. Bureau of Economic Analysis showed that in 2019 the outdoor recreation industry brought in \$459.8 billion nationwide. By limiting access to the monument or decommissioning trails the BLM could be harming the local economy and robbing them of potential income.	N/A
Stacey	Craig	N/A	Component of alternative proposed; recreation	Escalante Canyons are being overrun by...well, everyone. Limit access to these canyons....lottery?	1451.jpg

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Clayson	Dirk	N/A	Component of alternative proposed; recreation	I would advocate for the development of some single track dirt bike trails. There is plenty of land suitable for this.	N/A
Anderson-Schwartz	Pat	N/A	Component of alternative proposed; recreation	Limit expansion of recreation and growth to front country areas to minimize development in less used back country. This protection will allow wilderness experiences to those who seek silence and solitude.	BLM Comments.docx
Fults	Steven	N/A	Component of alternative proposed; recreation	Please preserve and hopefully improve any and all landing strips within the affected area for any number of very obvious reasons.	N/A
Shelton	Carolyn	N/A	Component of alternative proposed; recreation	Protect lands that qualify as wilderness by imposing group use restrictions (both private and SRPs), and type of use restrictions (i.e.. no competitive events on the monument), as in the 2000 MMP. Management zones provide proven guidelines for use. Any growth or developments should occur in the frontcountry, while protecting the backcountry from all development. Special monitoring of dispersed recreation is necessary, and overall, permits, lotteries, and use restrictions may be necessary to protect the objects and values and maintain a quality recreation experience now and into the future.	N/A
J	A	N/A	Component of alternative proposed; recreation	SPECIAL USE/SPECIAL RECREATION USE PERMITS: This plan needs to include extensive language about special use/special rec permits - in terms of scientists, guides, ranchers, etc. I want to see small group sizes (12 or less) across the board, no caravans over 5 vehicles, explicit details about waste disposal and removal for groups, leave no trace mandates for groups, detailed reporting requirements (include a spatial data component to know EXACTLY where people are going), as well as funding for monitoring permittees. Any larger groups should be subject to a mandatory video or orientation with a ranger. Monitoring of these regulations in VSA's should be at even more frequent intervals than in other areas.	GSENM_20220923.pdf
J	A	N/A	Component of alternative proposed; recreation	stop allowing SRPs at Yellow Rock (hard to avoid a tour group on this hike and rock is surrounded with tons of archeology - have you surveyed that?)	GSENM_20220923.docx
Holmes	Jenny	N/A	Component of alternative proposed; recreation	The backcountry areas, however, should not have added facilities to overuse by dispersed recreation.	N/A
Veranth	John	N/A	Component of alternative proposed; recreation	The GSEMN management plan should integrate commercial guides, guidebook authors, and local outfitting businesses into their plans for visitor communication and education.	Veranth Scoping 926.pdf
Veranth	John	N/A	Component of alternative proposed; recreation	The management plan needs to accommodate the continuing increase in backcountry visitation while protecting scientific values and resources.	Veranth Scoping 926.pdf
Veranth	John	N/A	Component of alternative proposed; recreation	The management plan needs to address providing timely and accurate information on secondary roads. Current road information is often vague and often several days out of date. Better integration between the BLM and the county road departments would benefit the public.	Veranth Scoping 926.pdf
Veranth	John	N/A	Component of alternative proposed; recreation	The management plan should discuss ways to increase public opportunities to learn about the scientific value of the monument. This could include new access trails and interpretive sites.	Veranth Scoping 926.pdf
Veranth	John	N/A	Component of alternative proposed; recreation	The management plan should emphasize the value to the public of dispersed, non-motorized recreation opportunities.	Veranth Scoping 926.pdf
Veranth	John	N/A	Component of alternative proposed; recreation	The management plan should include selective trail hardening in high visitation areas. Most notably Lower Calf Creek Falls and Devils Garden, and the Hoodoos Trail.	Veranth Scoping 926.pdf
Veranth	John	N/A	Component of alternative proposed; recreation	The plan should consider adding trailheads serving short hikes to viewpoints and natural features near the major roads. Existing destinations of this type should be improved as demand increases. Specific examples include the Twenty-five mile track sites, and the Wolverine petrified wood area, but there are many more opportunities for improved visitor access of this type.	Veranth Scoping 926.pdf
Sutter	Eileen	N/A	Component of alternative proposed; recreation	There needs to be a planned approach to managing recreational uses within the monument, using the principles found in the report by Dr. Christopher Monz, Outdoor Recreation and Ecological Disturbance: A Review of Research and Implications for Management of the Colorado Plateau, 2021. Important recommendations in this report: create clearly defined zones of use, including front country and back country zones. Concentrate new recreational use close to already existing communities and in areas of current high use. Limit motorized access, especially to back country areas.	Comments for 2022729 GSENM RMP FR Notice of Intenet 2022.docx
inbar	daria	N/A	Component of alternative proposed; recreation	There's an optimal level of development and visitation that enhances nature. Below this, and I go to these places where others don't, there's neglect. I feel very strongly that the monument is sorely UNDERdeveloped. There should be better roads and many more developed (primitive) campgrounds. Not campsites, but campgrounds! The current state encourages misuse, littering, and driving places where you shouldn't. It's nearly impossible to find a clean and accessible spot. It's also disappointing to find practically every inch of BLM land covered in cow manure.	N/A
Lloyd	Christopher	N/A	Component of alternative proposed; recreation	These airstrips must be preserved for future use. Maintaining access to these public lands should be the primary focus of the DOI.	N/A
Black	Trout	N/A	Recreation use and visitor services	Differentiate between okay-to camp-here and no-camping-here	N/A
Black	Trout	N/A	Recreation use and visitor services	Some locations, for example Coyote Gulch, need daily quota visitation permits. Now.	N/A
Black	Trout	N/A	Recreation use and visitor services	Some trails, like to Lower Calf Creek Falls, will very soon, ?now? , need Bus Shuttles to and from a well-removed parking lot (Zion NP Staff can help).	N/A
Falcon	Jennifer	N/A	Recreation use and visitor services	Hunting and trapping should be prohibited.	N/A
Jones	Travis	N/A	Recreation use and visitor services	Backcountry use should be managed to avoid degradation of vegetation, wildlife and cultural resources.	N/A
Shaffer	Joseph	N/A	Recreation use and visitor services	Organize recreation using a front-country and back-country system.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Jones	Travis	N/A	Recreation use and visitor services	Recreation should be managed such that the land is not destroyed due to over use. Existing trails should be utilized for recreation.	N/A
Not Provided	Not Provided	N/A	Recreation use and visitor services	Campsites should be created specifically for tent camping and separated from RV's . RV camping should be limited in scope and be located at the earliest possible access on a monument road (e.g., at the beginning of Hole-in-the-Rock road).	N/A
Not Provided	Not Provided	N/A	Recreation use and visitor services	Vault toilets should be provided for both RV tent sites. but carry in/ carry out should be implemented throughout the monument.	N/A
Corbato	Steve	Oregonians For Wild Utah	Component of alternative proposed; recreation	o This is a Monument designated to protect a variety of spectacular geologic, ecosystem, visual, historic, paleontological, and cultural resources. It was not designated as a recreation-focused Monument and should not be managed in a manner to provide for the promotion and expansion of recreation at the expense of the resources and values that the BLM is obligated to protect.	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; recreation	The DWR would like to see the GSENM RMP identify wildlife recreation as a high value use within the GSENM.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Walker	Joro	Western Resource Advocates (WRA)	Component of alternative proposed; recreation	Further, BLM has an obligation to protect Glen Canyon National Recreation Area. The National Park Service, the DOI agency that administers Glen Canyon, must "conserve the scenery, natural and historic objects, and wildlife in [Glen Canyon] and [] provide for the enjoyment of the scenery, natural and historic objects, and wildlife in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." 54 U.S.C. § 100101(a); see also 16 U.S.C. § 460dd-3. BLM's management decisions must be consistent with and further these conservation obligations.	wra gsenm rmp scoping 9 18 2022.pdf
Pollock	Leland	Garfield County Commission	Component of alternative proposed; recreation	We are discouraged to find that the proposed alternatives are set in a way to offer an "either/or" option for recreation in contrast to other land uses. We believe that recreation is compatible with other appropriately managed multiple use activities including grazing. We expect to work with our cooperating agency partners to come up with a range of alternatives that meet our multiple use objectives identified in our resource management plan. However, if for some reason there is a conflict between recreation and grazing or a pre-existing lease, mining claim, or material right of way, we support those pre-existing uses.	Garfield County Commission.pdf
Griffin	Simone	BlueRibbon Coalition	Component of alternative proposed; travel management	Current trends show an increase in outdoor recreation the past few years that isn't looking to slow down. With more users on public lands, decommissioning and closing routes from creating more roadless areas, areas of environmental concern or wilderness characteristic areas would be irresponsible as this would concentrate more users into a smaller space which would increase the potential for injury and impact.	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Component of alternative proposed; travel management	Expanding trail networks for all user groups, as well as new user groups such as ebikes, dispersed camping and overlanding needs to be analyzed and incorporated into an alternative.	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Component of alternative proposed; travel management	The GSENM area is an incredibly popular area for off-highway use and dispersed camping. It covers large areas throughout Southern Utah. This travel area is managed with aggressive restrictions on motorized recreation, dispersed camping, and other forms of outdoor recreation, BLM should work to maximize OHV use in this area.	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Component of alternative proposed; travel management	Alternatives need to recognize the recreational value that these opportunities bring and the BLM needs to manage for multiple use and not restrict these opportunities further. We are concerned that the Little Desert Open OHV riding area, the V-Road and Inchworm Arch Road are being considered for closure. These areas have a history of use and a vital purpose and need.	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Component of alternative proposed; travel management	Closures should not be seen as legitimate almost hardwired responses to issues that can all be managed through other management strategies. BLM should acknowledge that the Categorical Exclusions that apply for construction of new roads and trails should be applicable to these classes. In many cases these exclusions are for rerouting existing routes because of erosion events, or creating roads to do vegetation treatments that reduce the risk of catastrophic fire.	GSENM Resource Management Plan Scoping.docx-2.pdf
Painter	Michael J.	Californians for Western Wilderness	Component of alternative proposed; travel management	Motorized travel should be limited to existing roads and routes, as designated in the Travel Management Plan of 2000, and any existing roads that have been found to cause harm to Monument objects should be closed. BLM should assert the authority to take this action should it become necessary in the future, even if only on an emergency basis, after this RMP is finalized.	N/A
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; travel management	The public would greatly benefit from continued management for multiple-uses including an enhanced system of OHV routes and less designated or defacto wilderness area. The pandemic has brought visitors back to our public lands and 98% of them are looking for multiple-use activities. Therefore, we oppose the closure of any motorized access and motorized recreational opportunities and the development of a Pro-Recreation Alternative.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; travel management	Recognize the Need for Long-Distance Motorized Trail Systems 1.The agency should adequately consider that it has developed many long distance non-motorized trail systems including the CDNST and PCT and has not developed any long-distance trail systems for motorized recreationists. 2.The agency should adequately consider that long distance motorized trail systems would see far more use than non-motorized trails. 3.The agency should adequately consider that long distance motorized trail systems would provide far more benefit to the human environment including therapeutic recreation and economic benefit than non-motorized trails.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; travel management	The agency should adequately consider that adjacent travel plans did not adequately consider the needs of motorized recreationists at the time. Moreover, conditions and information has changed dramatically as documented by our comments.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; travel management	The agency should adequately consider that travel planning and other planning actions have closed 25 to 75% of the historic motorized routes and all cross-country opportunities since the 1960's.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; travel management	The agency should adequately review recent aerial photographs of the project area and ride the area on an OHV with all types of OHVs and skill levels to determine the routes that the public currently uses and needs in the project area.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; travel management	The agency should revisit any motorized closures that were enacted without adequate site-specific data.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf



Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
McKay	Patrick	Colorado Offroad Trail Defenders	Component of alternative proposed; travel management	We particularly want to see the two roads that were reopened to motorized use in the 2020 management plan continue to remain open to motorized use. The 2020 management plan specifically determined that reopening the V-Road and the Inchworm Arch road would improve recreational access while not unduly harming any monument values. We urge the BLM to strive for consistency in management and to preserve that decision in all alternatives considered for the new management plan. The V-Road provides crucial access to the Cosmic Ashtray geological feature. Reopening the road to vehicles greatly shortens the hike to this attraction, allowing people with 4-wheel drive vehicles to visit it who would not otherwise be able to hike all the way from the 2-wheel drive trailhead. This benefits people with disabilities and allows people whose disabilities prevent them from hiking long distances to still visit this feature. The Inchworm Arch road facilitates access to a scenic viewpoint of Inchworm Arch near Kanab. Prior to 2020, visiting the arch required a lengthy hike. After the 2020 management plan reopened it, it is possible to drive a 4x4 or UTV to within a few hundred yards of the arch viewpoint, making it a short and easy hike that is accessible to many more people. Both of these roads have existed for many decades, and it is my understanding that they both continued to receive fairly regular (albeit illegal) vehicle use even after they were technically closed by the original monument management plan. The 2020 management plan merely recognized the reality that there was strong public demand for motorized access to both of these roads, and that it is possible to manage them as open without harming any objects or values of the monument. This continues to be the reality today, and demand for these roads to remain open has only grown now that they have been legally open for the last two years. Nothing has changed as a result of the new monument designation, and there are no new objects or values under the new designation statement which are incompatible with continued motorized use of these roads. Closing them once again would only cause public confusion and increased controversy as a result of constantly changing management. The BLM should strive, to the greatest extent possible, to maintain consistency of management with the 2020 management plan, particularly in respect to these roads. We strongly urge the BLM to keep both the V-Road and Inchworm Arch roads open to motorized use under all alternatives under consideration for the new management plan. In the same vein, we also urge the BLM to maintain all existing OHV area designations, including the Little Desert open OHV area. The 2020 management plan specifically determined that designating a small area open to cross-country OHV travel was not incompatible with protection of the monument's objects and values. We do not believe anything has changed with the new designation to negate this. We ask that at least one alternative consider keeping the Little Desert OHV area open to cross-country motorized use. Even if the BLM determines that cross-country OHV use is incompatible with the monument's objects and values, all areas of the monument that are currently limited to designated motorized routes under either the original or 2020 management plans should continue to have this area designation. We remind the BLM that the original management plan closed hundreds of miles of motorized routes, and the routes that remain open today are the bare minimum necessary to provide sufficient levels of public access to the monument's attractions. In fact, we submit that the route closures in the original management plan were excessive and that the BLM would do well to consider reopening additional roads as it did with the V-Road and Inchworm Arch road. Two such roads that still have strong demand for motorized access are the Paria River road and the Grand Bench Neck road. Both of these roads have been claimed as RS-2477 roads by Kane County and the State of Utah, and are included in the ongoing RS-2477 bellwether case currently in Federal District Court. It is highly possible that by the time the new management plan is completed, the court will have determined that both roads are subject to RS-2477 right-of-ways and must be reopened to vehicles. Even if not, there is nothing which prevents the BLM from recognizing that these roads are still highly desirable for motorized access to remote parts of the national monument, and reopening them on its own initiative. We therefore urge the BLM to consider at least one alternative that would reopen both the Paria River road and the Grand Bench Neck road to motorized vehicles in the management planning process. And we believe the BLM is required to consider reopening additional roads by President Biden's executive order on equity and the Department of Interior's Equity Action Plan.	Grand Staircase Escalante Scoping Comment .pdf
Gagner	Paul	Dreamland Safari Tours	Component of alternative proposed; travel management	All road availability should be equitable. Administrative roads open to cattle ranchers should be open to the public, including guides.	N/A
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	Additionally, Proclamation No. 6920 includes specific travel management guidelines for the Monument. Motorized and mechanized travel in the Monument is to be limited to designated roads (collectively, "routes"). Other BLM-managed national monuments limit motorized vehicles in the monument to street-licensed vehicles only. This helps prevent illegal off-road use in the monument, and we recommend BLM adopt a similar approach for GSENM.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	Goal 2 Encourage a sense of stewardship and conservation of the landscape during travel.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	Goal 3 Ensure a minimum network of roads designated for motorized use.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	Travel, Transportation, and Access Management - Proposed Alternative Components Goal 1 Manage the transportation system so it provides safe and reasonable access for public travel, recreation uses, traditional and cultural uses, and land management and resource protection activities while protecting and preserving Monument objects and values.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	User-created (i.e. undesignated) routes should be prioritized for immediate signage, closure, and restoration/reclamation work. In future travel planning, route designations and application of the minimization criteria should apply best available science, including but not limited to peer-reviewed best management practices for OHV use in dryland ecosystems.70 70 Adam Switalski, A. (2018). Off-highway vehicle recreation in drylands: A literature review and recommendations for best management practices. Journal of Outdoor Recreation and Tourism 21: 87-96.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	: Due to the potential for harm to Monument objects and values, including soils, vegetation, wildlife, and natural soundscapes, limit all aircraft (fixed-wing airplanes, helicopters, paramotors, etc.) takeoff and landing to areas within the Frontcountry zone, and only on designated routes, except for in emergency management situations.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	TM-1: Close No Mans Mesa, Little No Mans Mesa, Big Bowns Bench, Spring Point and Smoky Mesa RNAs to motor vehicle use.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	TM-10: "The V Road" will be closed to all non-administrative motorized use.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	TM-11: "Inchworm Arch Road" will be closed to all motorized use.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	TM-13: The only active airstrip in the Monument is the New Home Bench airstrip near Boulder. No other airstrip would be permitted in the Monument.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	TM-2: Identify the entire GSENM as a travel management area for the purposes of current and future travel management.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	TM-3: Improve signage in Monument travel corridors so that users understand land-use rules and regulations (for example: "Administrative Use Only" for routes in use by Agency, permittee, or ROW holders, but not the general public).	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	TM-4: Bicycles will be restricted to existing highways and OHV roads.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	TM-5: Identify existing roads open to motorized travel in the Monument to provide a clear baseline for travel planning.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	TM-6: Conduct comprehensive travel management planning that limits all motorized and mechanized recreational travel within the Monument to designated routes. -Do not designate new motorized or mechanized routes. -Limit motorized use to designated roads and street-licensed vehicles only. -Apply best management practices and minimization criteria for all motorized route designations.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	TM-8: Open routes may be maintained within the disturbed travel surface area as of the date of this Plan; no widening, passing lanes, or other travel surface upgrades, including paving of unpaved roads, could occur. Deviations from the current maintenance levels will be allowed as follows (subject to Wilderness Study Area Management Criteria in BLM Manual 6330): -Hole-in-the-Rock Road: Allow stabilization of washout prone areas, primarily along the southeastern end, to prevent erosion and sediment loading in drainages. -Smoky Mountain Road: Allow stabilization in the Alvey Wash section to prevent erosion and sediment loading in drainages. -Cottonwood Wash Road: Allow stabilization of washout prone areas, primarily along the southern section, to prevent erosion and sediment loading in drainages. -Skutumpah Road: Allow new crossing for safety at Bull Valley Gorge, and stabilization of washout prone areas, primarily along the northern section, to prevent erosion and sediment loading in drainages.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; travel management	TM-9: The Little Desert OHV area will be closed to cross-country travel.	Appendix B - RNA Proposals.pdf
Waggoner	Nathan	Grand Staircase Regional Guide Association	Component of alternative proposed; travel management	Primitive Travel Zone The majority of the comments that are relative to this zone will be directed at the travel management plan. The roads from the Outback Zone and the Passage Zone should fall into this zone. This zone should represent the dirt roads and roadside trailheads. This zone should represent approximately 20% of the National Monument. This zone is defined by access roads to trailheads and the primitive camping along those roads. This area should encourage dispersed camping, interpretive sites, and waste removal facilities (composting toilets). The interpretive sites should reflect the backcountry regulations enforced in the "Primitive Travel Zone" and the "Backcountry Zone" as well as the rules and regulations of dispersed camping. The interpretive sites along the roads should also cover resource protection and special rules that apply to SRMAs (Special Recreation Management Zones). The main goal of these signs should be to educate the public, not to discourage visitation. Camping in this zone should be signed and each site should not be within line-of-sight of each other or no less than 200 yards of one another. Power generation that exceeds 35 decibels should not be allowed. Dispersed camping should be monitored and maintained via road pull offs and signage. Dispersed camping should remain free to the public. If dispersed campsites are identified and maintained then there should not be a conflict between the public and the other user groups. These regulations should be enforced to insure a wilderness feel. There are a number of dispersed campsites along Hole-in-the-Rock Road. These should be identified by BLM staff and signed appropriately. They should be first come first serve and the limit of stay should be 12 days. These regulations should be implemented to promote a feeling of isolation and solitude. Each site should have adequate parking and space for a group size limit of four cars or 12 people. This style of signed dispersed camping should be coordinated with adjacent public land agencies so people are spread out along the Primitive Travel Zone. If a visitor encounters an occupied site they can choose to move further down the travel corridor, leave their vehicle at a trailhead and camp in the backcountry Zone, or return to the Gateway Community Zone. All roads in this zone are maintained and properly signed. Areas of a delicate nature (closed spur roads into wilderness areas, regions with endangered and threatened flora and fauna, delicate soils, etc.) should be immediately marked and signed so visitors, guides, ranchers don't use them and create closures after the road plan has been approved. Users should not receive special treatment when it comes to roads. At no time should an administrative road be open to one group and not another. Access should be the same across the board. Furthermore, if a road is maintained it should be open to the public and all other user groups unless it accesses sensitive BLM maintained facilities or BLM provided housing. There should be no other reason for an administrative road. For far too long, access to roads has been inconsistent with the road management plan on the National Monument. These inconsistencies have arisen for two reasons; faulty interpretation of the management plan or lack of enforcement. For example, guides and outfitters are not allowed to use all the maintained sections of Sheffield (Spencer Flat) road while the general public and ranching permittees have full access to these corridors. There is no reason why guides should not be able to use these maintained stretches of road. Currently we have to have our clients drive us to these locations and that defeats the purpose of guides driving their insured vehicles on public roads. We carry insurance to insure any damages inflicted by us, our vehicles, or our clients is covered. A member of the public is not required to have this level of insurance before using the roads. Furthermore, we are familiar with these roads and where to park along them. It is far safer for our clients and the environment if we are at the wheel. Another example of special privilege is the use of the V road at Harris wash trailhead. This road was open for BLM use and for ranchers while it was closed to the public and guide services. These are public lands and public roads; if a road is maintained at the expense of the public, the BLM should ensure it's open to public use and not maintained for a special interest group.	Grand staircase regional Guide association scoping.docx
Cutler	Clayton	Kane County Utah	Component of alternative proposed; travel management	Lands and Realty: Kane County maintains approximately 35 roads on the Monument, mostly on its perimeter. The majority of the interior roads (over 450 @ approx. 1,514 miles) are being claimed by Kane County as R.S. 2477 rights-of-way. The County would like to encourage the BLM to help determine the validity of a road as an R.S.2477 right-of-way in the planning process.	Scoping Letter GSENM -signed.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Cutler	Clayton	Kane County Utah	Component of alternative proposed; travel management	Recreation Use and Visitor Services: Outdoor recreation also is of great importance to the economy of Kane County. One item of concern is under three of the four Preliminary Range of Alternatives presented. The information obtained at the meeting was disclosed to say that the entirety of the GSENM would be designated "limited" or "closed" to OHV use. This will have detrimental effects to residents of Kane County, and therefore leaving only one alternative designated as open. The open designation falls under the "No Action Alternative" and bares no weight as the purpose of the Range is to choose an action alternative. The County would like to encourage the BLM to reevaluate its Range of Alternatives, and include more areas as open to OHV use, and include the open designation in more than just one of its alternatives.	Scoping Letter GSENM -signed.pdf
WARD	EVERETT	N/A	Component of alternative proposed; travel management	BLM should not establish any “open” motorized travel areas within the Monument, and should limit all motorized travel to designated routes established in the 2000 travel management plan. Any expansion or addition of new routes will harm monument objects.	N/A
Sorenson	Craig	N/A	Component of alternative proposed; travel management	- Implement the 2000 Travel Plan. BLM has been maintaining a file for recommending a few road minor adjustments to the 2000 Travel Plan. It behooves BLM to use good management practices when it comes to planning updates like this and the information is already compiled. Off-road vehicle use impacts are not consistent with Monument protection so implementing a travel plan requires enforcement and restoration of impacted areas.	GSENM Management Plan Comments.pdf
Not Provided	Not Provided	N/A	Component of alternative proposed; travel management	- Most of the Utah backcountry airstrips have been in existence since the 1950s, long before passage of the GSENM legislation or the 1964 Wilderness Act. There are several existing Utah backcountry airstrips in the study area. I encourage the BLM to retain access and use of these airstrips, consistent with protection and conservation of the objects and values of the GSENM. Boulder - 37.88548 N / 111.46342 W Collet Top - 37.45633 N / 111.467 W Colt Mesa - 37.74 N / 111.08834 W Escalante Canyon – 37.5323 N / 111.7063 W Grand Bench - 37.27334 N / 111.195 W Pilot Knoll - 37.24317 N / 111.491 W Squaw Bench - 37.36817 N / 111.66333 W	N/A
Woodward	Katie	N/A	Component of alternative proposed; travel management	Additionally, researchers specifically recommend banning OHV use in critical wintering habitat for ungulates. Maps 3 and 19 of the RMP indicate that the North Escalante Canyons WSA is crucial wintering habitat for mule deer and elk. OHV access here has the potential to reduce their migration routes and the quality of this habitat, and lead to herd displacement to lower quality habitat.	Woodward_GSENMcomment.pdf
Villa	Gio	N/A	Component of alternative proposed; travel management	Airstrip Access Continuation: As an aviation enthusiast and occasional backcountry pilot, I believe these airstrips listed below add tremendous value for numerous reason which I will list while not jeopardizing the existing landscape, flora or fauna. - Boulder - 37.88548 N / 111.46342 W - Bowington - 37.77606 N / 111.39434 W - Cedar Wash - 37.66053 N / 111.54239 W - Collet Top - 37.45633 N / 111.467 W - Colt Mesa - 37.74 N / 111.08834 W - Escalante Canyon - 37.5323 N / 111.7063 W - Grand Bench - 37.27334 N / 111.195 W - Pilot Knoll - 37.24317 N / 111.491 W - Squaw Bench - 37.36817 N / 111.66333 W More specifically these airstrips should continue for the following reasons/benefits: -Been in existence since the 1950s and well before the wilderness act 1964 -The air strips are only used during dry conditions so disturbance and erosion will be minimal. -They are on very flat land again greatly reducing possible effects of erosion -Aviators helps assist reporting and discouraging illegal activities. I have personally addressed others on illegal motorized vehicles. -Can be used for emergency services aircrews, environmental assessment and wildlife assessment crews -Allows access to remote areas without motorized vehicle trails or roads. -Noise is very low and proven to have a minimal to no impact on wildlife. My children are amazed with how little noise is generated from the small backcountry planes that use these strips. By allowing these airstrips to exist it allows access to a group of citizens that are: -Very environmentally conscientious, leave no trace and removing debris others have left. -Campers and backpackers that support preservation -With limited mobility but still want to enjoy and visit the more remote areas -Agreed maintenance of these strips is shared and supported by the Utah Back Country Pilots associations & the Recreational Aviation Foundation	N/A
Spencer	Fred	N/A	Component of alternative proposed; travel management	As pilots we propose that the BLM, open the 12 airstrips on the monument so that Backcountry Pilots can enjoy the area too. Many pilots like to fly into area and camp or day hike. Backcountry Pilots are always asking me what airstrips are in the area, that they can land on and enjoy the country, not just fly over it. - One on tipperary - Two on Four mile bench - One on Paradise canyon top - One on Dance Hall rock - One on lower little valley road to last chance - One on the neck of grand bench - One on Rock creek - One at Hole in the Rock - One on burning Hills - One on Collet top (shows on map, did have a DC3 land there in the past) - One on Colt Mesa - Fix the Boulder airstrip. Block off road through the middle of it, reroute it around the strip to the trail head.	N/A
Walton	Steuart	N/A	Component of alternative proposed; travel management	Backcountry airstrips should be considered both a resource for the management of the lands and an integral asset for the personal safety of those accessing the 1.87 million acres of public lands. These airstrips can provide vital access to aid Search and Rescue teams, expedite emergency response, and provide options for firefighting operations when time matters. Ultimately, the RMP aims to protect and restore the biological resources of GSENM. The fact is that aviation has a very small environmental footprint-the lightest footprint form of access to these lands. Noise from aircraft is insignificant. The airstrips are positioned on natural, flat-land features and there's minimal soil disturbance or erosion. Aviators are non-motorized recreationists, participating in low-impact activities like hiking and camping, and practicing the leave no trace principles.	N/A
Yarnell	Karen	N/A	Component of alternative proposed; travel management	BLM must proactively plan for helicopter use and set clear, strong guidance to protect natural soundscapes, sensitive wildlife, biological crust, and visitor experience with regulations on landing, overflights, and commercial and private operations. BLM must manage airstrips and landing locations as they would other motorized travel routes, and must not permit the establishment or use of airstrips or landing locations in Wilderness Study Areas and other wilderness-quality Monument lands.	N/A
Yarnell	Karen	N/A	Component of alternative proposed; travel management	BLM should not establish any “open” motorized travel areas within the Monument, and should limit all motorized travel to designated routes established in the 2000 travel management plan. BLM should also take the opportunity to close routes that are harming monument objects like soils, cultural sites, and natural soundscapes and viewsheds.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Kemp	Travis	N/A	Component of alternative proposed; travel management	I am an private pilot, I am writng to supoort the continued operation of grass and dirt airstrips on the Utah Backcountry. Aviation should be included in the RMP for the following reasons. The airstrips in question have been there since the 1950's. This predates the Wilderness act. In places like Idaho and other states, airstrips have been preserved. In addition aviation has a very small footprint. Our wheels only touch the airstrips, and our noise is transient and short lived. These airstrips also provide access to those that are physically unable to reach these lands on foot or non-motorized vehicle. They also provide critical access for search and rescue operations and fire fishing operations. Airstrips are a safe haven for pilots flying overhead when mechanical issues or bad weather force the end of their flight. Air strips allow better access for lands administrators to supervise the land. Small aircraft do no impact wildlife. This has been proven by peer reviewed study. Airstrips are trailheads.Many places that would be unreachable are readily accessible by plane than on foot. Backcountry aviation brings money to local communities. We buy fuel from the airport and eat at their restaurants. The recreation aviation foundation anf the Uth Backcountry pilots are good patners to the BLM and state officals. These cooperation has led to many successful projects to maintain and develop these airstrips. Such cooperation is rare in today's day and age and should be promoted and fostered.	GSENM RMP.EIS Comment Card_20220729.pdf
Coleman	Lori	N/A	Component of alternative proposed; travel management	I am strongly against closing any more roads and also removing cattle from the monument. Look how crowded Calf Creek is now and you want to restrict visitation even more? They'll still come to visit. It will jsut make it more crowded. Also the disabilities act should prevent you from denying access to the disabled - by closing the roads.	N/A
Weppner	William	N/A	Component of alternative proposed; travel management	I enjoy recreating on and accessing public lands. I believe public lands provide crucial elements to the public and are important to be managed in a way that allows for continued access and use. I support keeping the most routes open possible throughout GSENM so that access is not restricted for users. I am opposed to any closure and reclamation of routes. Those routes exist because there is a purpose and need for them and a history of use. Many of the routes throughout the monument were created by long time settlers, ranchers and farmers and the history and cultural importance should be recognized. Any environmental damage identified due to routes should be first addressed with management solutions such as re-routing, signage, and education materials. Closure is not management. Through different management strategies and proper education, negative impacts can be properly mitigated without closures. I believe the Little Desert OHV open area, the V-Road and Inchworm Arch Road need to stay open to public use. They have a purpose and need as well as a strong history of use.	N/A
Ormond	Annette	N/A	Component of alternative proposed; travel management	I think the roads need to remain open and maintained for the safety of everyone. I've heard first responders complain about how bad the roads are and how it greatly hinders rescue operations. As long as there are hikers, bikers, or any other public use, there will always be a need for access to the roads.	Letter to GSENM 2022.pdf
C	Peter	N/A	Component of alternative proposed; travel management	It's truly horrible that helicopters and other small aircraft have exploded in the Utah backcountry in recent years. Along with drones, visitors to many remote backcountry locations including in WSAs are disturbed by both commercial and private helicopter operators. BLM must proactively plan for this increase in helicopter use!	N/A
Sjogren	Morgan	N/A	Component of alternative proposed; travel management	Limit all motorized and OHV Travel to designated routes. Anything that deviates directly impacts monument objects such as biocrusts and endemic/rare plants. It also puts wildlife and human safety at risk.	40 Mile Gulch _ 2 May 2020.pdf
Not Provided	Not Provided	N/A	Component of alternative proposed; travel management	Over the years, several routes have been decommissioned and access restricted further and further. Continuing down that path should not be a goal of this new plan. Areas that residents have long used for access and recreation should not be further impacted. This includes areas such as the "Little Desert" and Alvey Wash area outside of Escalante, the Cottonwood Wash and Paria areas near Cannonville, Nephi Pasture and John R Flat areas near Kanab, roads on the Kaiparowitz, etc. These routes have long standing traditional values. There should be an understanding that not everyone has the ability to get out and hike to see these amazing landscapes and we have a duty to provide better access to all for their enjoyment. Additionally, more can be done to better improve access and parking to popular areas, such as was done with Dry Fork Trailhead. Better improvements mean less impacts in the long run.	N/A
Maynard	Paul	N/A	Component of alternative proposed; travel management	Please include aviation and retention of the nine Utah backcountry airstrips in the study area. They have been in existance since the eraly 1950's. These airstrips offer life-saving options when small aircraft encounter mechanical issues and provide access to aid for Search and Rescue and firefighting as well as other emergency usage. They also provide access for recreational access which offers a positive economic impact. Please consider keeping these airstrips in the plan.	N/A
Plummer	Richard	N/A	Component of alternative proposed; travel management	Recreation is an important consideration, though not a priority objective; given the recreation pressure on these lands, the BLM should adopt an approach using management zones (as per the original management plan, before it was retracted). Any expansion of recreation facilities and infrastructure should be limited to frontcountry areas, existing well-defined and accepted roads, etc. Maintain roads with a light touch they should not, in general, be substantially updated. nor new roadways created.	N/A
Trimble	Stephen	N/A	Component of alternative proposed; travel management	Taking great care to show restraint and avoid new vehicle routes is the only feasible way to protect Monument objects. Vehicles imperil biological soil crusts that reduce erosion. The BLM should not establish any "open" motorized travel areas within the Monument, and should limit all motorized travel to designated routes established in the 2000 travel management plan. Any expansion or addition of new routes will harm monument objects. Close any routes that are harming monument objects like soils, cultural sites, and natural soundscapes and viewsheds. We don't yet know what all those objects are in full detail. Because of the incredible scope of both archaeological and paleontological resources and how labor-intensive this work is, only about 4-6 percent of GSENM has been inventoried for these resources. Again, restraint is crucial.	GSE RMP comments 9-2022.pdf
Woodward	Katie	N/A	Component of alternative proposed; travel management	The agency may also want to use this information to remove the comment in section 2.19.2 which suggests for future TMP considerations that OHV use and mechanical transport be allowed on primitive routes that were available for use immediately before the monument's establishment. These routes have been rested for nearly 30 years and re-opening them to official motorized use would be a setback for the conservation goals established by the NLS, per the research referenced above.	Woodward_GSENMcomment.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Miller	Sally	N/A	Component of alternative proposed; travel management	The BLM should consider mechanisms to effectively manage recreational use that will protect Monument objects and also less tangible values such as solitude. Such mechanisms could include: 1) designated camping areas (especially for dispersed camping - I know there is one at the onset of the Hole in the Rock road; should there be more?); 2) possibly the development of a new "campground" (or campgrounds - one in the GS portion, one in the ESC portion) on disturbed BLM lands inside or just outside of the Monument in an attempt to accommodate increased demand and to try to alleviate the problem of out of control dispersed camping; 3) overnight quotas in the most heavily used areas such as the Escalante River corridor b/t town and highway 12 (in previous years we've been able to fill out a backcountry permit right at the Bridge trailhead so I assume there are still no quotas for backcountry use within the NM?); 4) potential designated campsites in heavily impacted backcountry areas though I see this as a last resort. The frontcountry/backcountry use zones suggested by SUWA should be managed to protect their respective values, and lower overnight use levels with more protective requirements (e.g., Leave No Trace practices) should be adopted for the backcountry zones.	N/A
Alderson	George and Frances	N/A	Component of alternative proposed; travel management	The plan should identify stream valleys that have been designated as habitat for the endangered Southwestern Willow Flycatcher. ORVs should be barred from any such valleys.	N/A
Larsen	Hanna	N/A	Component of alternative proposed; travel management	When it comes to travel management, widespread off-road vehicle use should not be allowed, and no additional routes should be designated in the planning area. All motorized travel routes within the planning area that were closed or limited under the 2000 monument management plan must continue to be managed pursuant to that plan, and the BLM should take the opportunity to close routes that are harming monument objects.	N/A
Wolfe	Don	N/A	Component of alternative proposed; travel management	Aviation should be included in the RMP as an allowable use. - Most Utah backcountry airstrips have been in existence since the 1950s, predating the 1964 Wilderness Act. Access and use of these airstrips should be retained. - Aviation has a very small environmental footprint, the lightest footprint form of access to these lands. Airstrips do not have driving wheels and once landed, do not go "off trail." Noise from aircraft is transient and of short duration. - Airstrips are situated on natural flat land features, such as level, open meadows with little occurrence of soil disturbance or erosion. - Airstrips provide vital access to aid Search and Rescue, emergency response, and firefighting. - Airstrips offer possible life-saving options when small aircraft encounter mechanical problems or deteriorating weather conditions while flying over the relatively hostile terrain in southern Utah. - Airstrips are an excellent resource to the administrative needs for supervising the lands. - Airstrips transcend the need for roads and offer widely dispersed recreation activities. Peer-reviewed research substantiates that small aircraft noise has no detrimental impact on wildlife. - Backcountry airstrips offer recreational access to the disabled and those with limited mobility and without the need for strenuous physical activity to enjoy our public lands. -Airstrips are trailheads: aviators are non-motorized recreationists, participating in hiking, camping and other low-impact activities. - Backcountry aviation offers a positive economic impact, with aviation fuel sales, food and lodging, sale of provisions and supplies, and other tourist-related support for the surrounding communities. - The Recreational Aviation Foundation and the Utah Backcountry Pilots have successfully renewed MOUs in place with the BLM to provide cooperative maintenance of the airfields. Sincerely	N/A
Bagley	Charles	N/A	Component of alternative proposed; travel management	Close All Airstrips within the Grand Staircase Escalante National Monument. There are NO BLM Rules for regulating airstrips! (That the public can find.) No one has a "Right" to use GSENM airstrips.	N/A
Baruey	Wade	N/A	Component of alternative proposed; travel management	Keep all existing roads open to use. Keep all trails open to use.	N/A
Shelton	Carolyn	N/A	Component of alternative proposed; travel management	Adopt at minimum the transportation plan (closed or limited routes) associated with the 2000 MMP, but go further. Absolutely no off-road use should ever be allowed. No additional routes should be designated as "open." The three specific routes opened under the latest RMP should be closed, as they were in the 2000 MMP.	N/A
J	A	N/A	Component of alternative proposed; travel management	All motorized travel routes within the planning area that were closed or limited under the 1999 Monument management plan must continue to be managed pursuant to that plan and BLM should take the opportunity to close routes that are harming Monument objects.	GSENM_20220923.docx
Orr	Nancy	N/A	Component of alternative proposed; travel management	All motorized vehicles need to be restricted to currently existing roads, with sizeable and painful fines for offroad travel. No new roads. Limit group sizes, both in campsites and for OHV groups.	N/A
Endres	Merrick	N/A	Component of alternative proposed; travel management	As a pilot and outdoor enthusiast, I would like to encourage the BLM to continue to provide aviation opportunities in the EIS/RMP study area by retaining the nine Utah backcountry airstrips.	N/A
Not Provided	Joe	N/A	Component of alternative proposed; travel management	Aviation should be included in the RMP as an allowable use. Most of the Utah backcountry airstrips have been in existence since the 1950s, long before passage of the 1964 Wilderness Act. Access and use of these airstrips should be retained. Aviation has a very small environmental footprint, the lightest footprint form of access to these lands. Airstrips do not have driving wheels and once landed, do not go "off trail." Noise from aircraft is insignificant and transient and short duration as a recreational aircraft flies overhead. Airstrips are situated on natural flat land features, such as level, open meadows with little occurrence of soil disturbance or erosion. Airstrips can provide vital access to aid Search and Rescue, emergency response, and firefighting operations. Airstrips offer possible life-saving options when small aircraft encounter mechanical problems or deteriorating weather conditions while flying over the relatively hostile terrain in southern Utah. Airstrips are an excellent addition to the administrative needs for supervising the lands. Airstrips transcend the need for roads and offer widely dispersed recreation activities. Peer-reviewed research supports noise from small aircraft has no detrimental impact on wildlife. Backcountry airstrips offer recreational access to the disabled and those with limited mobility and without the need for strenuous physical activity to enjoy our public lands. Airstrips are trailheads: aviators are non-motorized recreationists, participating in hiking, camping and other low-impact activities. Backcountry aviation offers a positive economic impact, with aviation fuel sales, food and lodging, sale of provisions and supplies, and other tourist-related support for the surrounding communities	N/A
WARD	EVERETT	N/A	Component of alternative proposed; travel management	BLM must manage airstrips and landing locations as they would other motorized travel routes, and must not permit the establishment or use of airstrips or landing locations in Wilderness Study Areas and other wilderness-quality Monument lands. These uses, which again, are not why the Monument was established, have the great likelihood of harming named Monument objects and resources like soundscapes, visuals, wildlife habitat, and biological soil crust	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
WARD	EVERETT	N/A	Component of alternative proposed; travel management	BLM should also take the opportunity to close routes that are harming monument objects like soils, cultural sites, and natural soundscapes and viewsheds.	N/A
Berry	Scott	N/A	Component of alternative proposed; travel management	Close the V Road and Inchworm Arch routes to motorized traffic.	RAD Management (2).pdf
Orr	Nancy	N/A	Component of alternative proposed; travel management	Do not allow OHVs anywhere close to WSAs, and make the boundaries very evident.	N/A
Stacey	Craig	N/A	Component of alternative proposed; travel management	Don;t pave Hole in the Rock.	1451.jpg
Sutter	Eileen	N/A	Component of alternative proposed; travel management	Helicopters, small aircraft and drone use have all recently increased. The Management Plant should include guidance for commercial and private operators on acceptable flight patterns. Airstrips and landing spaces should not be allowed in Wilderness Study Areas (WSA's). Air flights overhead need to be managed just like any other motorized form of access to GSENM because of their potential to disturb plants, wildlife and cultural resources.	Comments for 2022729 GSENM RMP FR Notice of Intenet 2022.docx
nebeker	victor	N/A	Component of alternative proposed; travel management	I humbly cast my vote in favor of leaving the following air strips open and available for those that enjoy and participate in back country opportunities. Boulder Bowington Cedar Wash Collet top Colt Mesa Grand Bench Pilot knoll Squaw Bench.	N/A
Adelman	Gabrielle	N/A	Component of alternative proposed; travel management	I would like to urge the BLM to continue to allow aviation use in the RMP, specifically, to continue to allow the operation of the nine airstrips contained in the Grand Staircase - Escalante National Monument. I am an airline transport pilot and commercial helicopter pilot, whose conservation website, <a href="https://www.californiacoastline.org">https://www.californiacoastline.org</a> , has been viewed over ten million times, and has been recognized by the California Coastal Commission in 2002-2003. Small aircraft are a vital conservation tool, for data gathering, public awareness and education, and endangered animal transport, all of which my husband and I have done as a member of Lighthawk, <a href="https://www.lighthawk.org">https://www.lighthawk.org</a> (see, eg., <a href="https://www.lighthawk.org/what-we-do/july-2022-conservation-flyer/">https://www.lighthawk.org/what-we-do/july-2022-conservation-flyer/</a> ). Such work relies on the availability of small airstrips in remote locations.	N/A
Lucero	John	N/A	Component of alternative proposed; travel management	Keep the airstrips. They predate the wilderness act, are the lightest impact access methods, and are critical for emergencies such as search and rescue, firefighting and other events. They allow use of otherwise neglected areas and provide economic benefits!	N/A
J	A	N/A	Component of alternative proposed; travel management	Maps do not reveal much emphasis on Travel Management. It sounds like a separate travel mgmt plan is in the works for the future, but I strongly encourage you to put as many basics about travel mgmt and roads in this plan as you possibly can. With the increased popularity of OHVs, I feel that managing OHVs/travel, as well as developed recreation is one of the most important things you can do to manage the GSENM. If you plan to address this in a separate plan, put a deadline in this plan - I don't want to wait more than a year for something as hugely impactful as roads to be addressed.	GSENM_20220923.docx
Hughes	David	N/A	Component of alternative proposed; travel management	Please keep these airstrips open.	N/A
Fults	Steven	N/A	Component of alternative proposed; travel management	Please preserve and hopefully improve any and all landing strips within the affected area for any number of very obvious reasons.	N/A
Stacey	Craig	N/A	Component of alternative proposed; travel management	Strictly limit ORV routes, and enforce access prohibitions.	718.jpg
Zimmerman	Cliff	N/A	Component of alternative proposed; travel management	The BLM should also take the opportunity to close routes that are harming monument objects like soils, cultural sites, and natural soundscapes and viewing areas.	N/A
Kidder	Brent	N/A	Component of alternative proposed; travel management	There are 9 airstrips in the EIS/RMP study area, and I an encouraging them to be included in the final document as an allowable use. They were mostly in existence prior to the 1964 Wilderness Act, so (like the many airstrips that were grandfathered into the Frank Church Wilderness Area in Idaho) their use should be retained. In addition, I have seen over and over the use of Off Road Vehicles to get to ruins or to explore areas without roads. They scar the lands, disrupt the wildlife and degrade the experience of hikers and other users. Airplanes have a small environmental footprint and their noise is of a short duration. Plans that incorporate airstrips in the study area just make sense, and I hope you will include them in the final document. From a safety standpoint, from an access standpoint (including maintaining them for firefighting and emergency response...not to mention helping those with ADA certification) and from the economic standpoint that pilots bring positive impacts to communities (aviation fuel sales, food and supplies, etc.), it just makes sense that the 9 airstrips be included in the plan.	N/A
Sutter	Eileen	N/A	Component of alternative proposed; travel management	There should be no new motorized travel areas. As Dr. Monz noted, motorized travel greatly expands disturbance in the area of the route and into surrounding areas. Motorized travel should be limited to routes in the earlier 2000 Travel Management Plan. BLM should close current routes that harm or have the potential to harm soils, cultural sites, natural soundscapes, and viewing points.	Comments for 2022729 GSENM RMP FR Notice of Intenet 2022.docx
Clayson	Dirk	N/A	Component of alternative proposed; travel management	we must preserve all historical accesses for motorized vehicles, including all RS2477 roads. The purpose and needs talks about roadless areas that existed. Yes this is fine, but to close of roads just to create roadless areas, that were not previously roadless is not fair or consistent with public access rights, or the American disabilities act.	N/A
Not Provided	Not Provided	N/A	Component of alternative proposed; travel management	We should ban OHV, and if we must only allow senior citizens and disabled people to operate OHV on public lands.	N/A
J	A	N/A	Component of alternative proposed; travel management	Widespread off-road vehicle use should not be allowed, and no additional routes should be designated in the planning area. Reverse the decision to designate the Little Desert area as an open off-road vehicle "play" area. Address the designation of Backcountry Byways and how that designation increases likelihood of satellite impacts in these areas.	GSENM_20220923.docx
Jones	Travis	N/A	Component of alternative proposed; travel management	New trail development should be minimal. Any new ATV trails should not be developed. Existing ATV trails can remain and their use should be managed to prevent further damage to the landscape. A balance between ATV and non-motorized uses should be achieved with the goal of preserving visual resources, night skies, and natural and quiet soundscapes.	N/A
Not Provided	Not Provided	N/A	Component of alternative proposed; travel management	I urge the BLM to consider that the state of Utah has over 80,000 miles of dirt roads, enough to circle the earth over 3 times, yet the OHV users are advocating for unfettered access to all roads within the GSENM despite the travel plan that was implemented in 2000.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Not Provided	Utah resident	N/A	Component of alternative proposed; travel management	Illegally created OHV routes should be closed and reclaimed, and those creating them prosecuted.	N/A
Smalley	Kenneth	N/A	Component of alternative proposed; travel management	I know I leave a very small footprint as my plane takes off and lands in less than 300ft. Flying over Utah requires knowing where to land if a problem arises and the more back country strips could save lives. I have noticed the use of strips for fire prevention, rescue and forest operations over the years. Eliminating or restricting back country airstrips would hinder all of these. I request that on my part and many others that back country airstrips remain open, maintained and even promoted.	N/A
Woodbury	Deborah	N/A	Component of alternative proposed; travel management	Keep the trails and tracks that were closed at the monument establishment, closed.	N/A
Black	Trout	N/A	Component of alternative proposed; travel management	Do not widen or pave any roads; flattening crowns in the middle of roads is okay.	N/A
Falcon	Jennifer	N/A	Component of alternative proposed; travel management	Ideally off-road vehicles could be prohibited, but if the only way to keep them from taking over is to give them a designated space, then that space should be small and controlled.	N/A
McCoy	Pete	N/A	Component of alternative proposed; travel management	Please consider limiting the expansion of motorized use.	N/A
McGeary	Michael	N/A	Component of alternative proposed; travel management	As a result of my visit, I strongly oppose any expansion of motorized access to the monument, such as additional roads or ATV trails. Grant Staircase Escalante is a place to visit and observe, not to play, It is a wonderful place and should be protected as much as possible from human impacts.	N/A
Schell	Ronald	N/A	Component of alternative proposed; travel management	Please do not allow the destruction of areas that qualify as wilderness by allowing mechanized travel or airstrips.	N/A
Schell	Ronald	N/A	Component of alternative proposed; travel management	Please do not create open mechanized kill zones within the Monument.	N/A
Shaffer	Joseph	N/A	Component of alternative proposed; travel management	Limit ORV use to designated travel routes, and do not designate any new routes.	N/A
Stacey	Georgiana	N/A	Component of alternative proposed; travel management	My husband and I have been backpacking for over 40 years and our go to place is the Grand Staircase Escalante area. We have packed the Escalante, the Paria, Death Hollow, and Coyote Gulch just to name a few more popular destinations. We recently visited Kodachrome Basin and hiked the Cottonwood Narrows. The area is spiritual to us and we have wonderful memories from every trip we have made there. Please protect this sacred land from off road vehicles and over use.	N/A
Worthy	Crista	N/A	Component of alternative proposed; travel management	NO MORE ORV USE.	N/A
Worthy	Crista	N/A	Component of alternative proposed; travel management	NO MORE NEW ROADS, PAVED OR OTHERWISE.	N/A
Jaszczak	Gabriel	Recreational Aircraft Foundation	Component of alternative proposed; travel management	As an active airline and recreational pilot who loves the outdoors, these back country airstrips are an incredible feature of the American wilderness that I haven't encountered elsewhere. They serve as great trailheads, allowing the public to more easily access remote wild areas. Airstrips a minimal effect on terrain and wildlife in the area, and are of great use to SaR teams and firefighters in case of emergency. They are a minimal cost to maintain, and the benefits far outstrip the price of keeping these airstrips in safe condition.	N/A
Lessig	WS	Recreational Aviation Foundation	Component of alternative proposed; travel management	I would like to encourage the BLM to INCLUDE AVIATION AS AN ALLOWED ACTIVITY in the RMP for the Grand Staircase-Escalante National Monument (GSENM). There are eight backcountry airstrips in the GSENM study area, most of which were created during the 1950s as a result of uranium exploration during the Cold War. These airstrips have a historical use which pre-dates the creation of the GSENM. Although in recent years, there has been low use of these airstrips, that use should be preserved and not eliminated. The backcountry airstrips in the GSENM and their locations are the following: There are 8 Utah backcountry airstrips in the EIS/RMP study area. Boulder - 37.88548 N / 111.46342 W Bowington - 37.77606 N / 111.39434 W Cedar Wash - 37.66053 N / 111.54239 W Collet Top - 37.45633 N / 111.467 W Colt Mesa - 37.74 N / 111.08834 W Grand Bench - 37.27334 N / 111.195 W Pilot Knoll - 37.24317 N / 111.491 W Squaw Bench - 37.36817 N / 111.66333 W	N/A
McGlynn	Bill	Recreationall Aviation Foundation	Component of alternative proposed; travel management	Please support this mode of reaching the internal trails of Utah in your plan. Aviation is actively working on quiet electric technologies and will in a few short years have solutions to the one drawback of current aircraft - the noise. Having these airstrips available will be important - not just for the safety aspects they provide today - but for the next generation that will want to use the new aviation technologies to reach these amazing places in Utah. I encourage you to look forward to those decades and those visitors and provide a space for them. In total the airstrips within your boundaries occupy less than 10 miles of equivalent road - small price to pay for the enjoyment it provides.	N/A
Jones	Robert	Southernmost EAA Chapter 1241	Component of alternative proposed; travel management	I am writing on behalf of the 100 plus members of The Southernmost EAA Chapter 1241, Marathon, Florida Keys to encourage the BLM to include aviation and retention of the nine Utah backcountry airstrips in the EIS/RMP study area.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; travel management	Current conditions and safety concerns on HITR Road require that counties begin improving the travel surface on the road. However, the BLM has refused to authorize the improvement because of a prescription in the 1999 monument management plan that prohibits surface upgrades to the HITR Road.(110) The surface improvements to the HIRT Road are both reasonable and necessary. County traffic counters showed that the average daily traffic for the summer season on the first 12 miles of the HITR Road was 594 vehicles. Federal gravel roads maintenance manuals suggest that paving can be justified from as low as 50 vehicles per day.(111) These same manuals state that when average daily traffic counts exceed 200 paving is recommended.(112) In addition the county traffic counters, counts conducted by the BLM show that visitation has increased from 82,926 in 2015 to 151,984 in 2021. This EIS and subsequent GSENM RMP should consider the traffic on HITR road and the safety concerns that will continue to exist until the road surface is improved. (110) This area of the Monument is currently being managed under the Record of Decision and Approved Resource Management Plan for the Kanab-Escalante Planning Area dated February 2020. Travel Management prescriptions TM-1 and TM-9 require the BLM to approve road improvement in accordance with the 2000 Travel Management Plan (TMP) unless a Title V is issued, or a legal decision is made on R.S. 2477 assertions. The 2000 TMP prescription TRAN-7 states that "no ... travel surface upgrades could occur." (111) See appendix D of Gravel Roads Maintenance and Design Manual (a publication sponsored by the Federal Highway Administration) (112) Ken Skorseth Et Al., Gravel Roads Maintenance and Design Manual, (2000)	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; travel management	Of concern to the State is the fact that under three of the four Preliminary Range of Alternatives presented by the BLM, the entirety of the GSENM would be designated "limited" or "closed" to OHV use. Only one alternative would allow for ANY open areas, and this alternative is the "No Action Alternative," which is clearly not going to be the alternative chosen as part of the Final EIS. Thus, it is clear that the BLM intends to designate the entire GSENM as either "limited" or "closed" to OHV use in accordance with the GSENM's scientific mandate. This intent was revealed by comments made by the incoming GSENM Manager Ade Nelson at the September 15th meeting. The State would encourage the BLM to reevaluate its Range of Alternatives, and include more areas as Open to OHV use, and include the Open designation in more than just one of its Alternatives.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; travel management	The BLM must address the safety and maintenance issues on the Hole-in-the-Rock Road as part of this EIS. BLM should not continue to kick that can down the road to some future imaginary travel management process. In 2017 the BLM promised the counties that it would do travel management simultaneously with the GSENM RMP. A few months into GSENM RMP planning the BLM recanted and promised that travel management would occur directly after the GSENM RMP. To date, travel management planning has not yet begun, and the Hole-in-the-Rock Road continues to be unsafe and deteriorate daily.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; travel management	Travel, Transportation, and Access Management 18.1. Law Enforcement, Search and Rescue, and Emergency Services Cooperation. The first issue that needs to be addressed and evaluated in the planning process as it pertains to transportation and access is law enforcement, search and rescue, and other emergency medical services. As is well known, the designation of the GSENM has increased visitation dramatically over the last 25 years. Law enforcement, search and rescue, and other emergency medical services are left almost entirely to local governments. BLM does not have its own funding for search and rescue operations except in "cases of emergency" and upon finding that certain narrow conditions are met.(103) Past experience over the last 25 years has shown that almost entirely, the costs and efforts for search and rescue efforts in the GSENM are borne by the state and counties. Previously, in an effort to "protect" the GSENM resources, BLM has refused to give direction to visitors to desired destinations.(104) This type of decision put extra burdens on the Escalante search and rescue teams and placed visitors in greater danger than was necessary. In evaluating this issue, BLM should consider the extra costs that the GSENM designation places on local governments including, but not limited to, gasoline and diesel fuel, wear and tear on fire trucks, ambulances, and other county equipment from the unnecessarily rough roads, and general rescue equipment such as ropes, harnesses, and gurneys. In considering these extra costs and burdens, BLM should develop alternatives that help rather than impede search and rescue efforts. The alternatives should grant access to vehicles and other necessary equipment including helicopters. The alternatives should also include rather than exclude important infrastructure for rescues. This should include, but not be limited to, an emergency ATV trail to access lower Calf Creek Falls as well as a landing pad in that same area for a helicopter. (103) 43 U.S.C. §1742. (104) For example, prior to the 2020 management plan, the BLM visitor center in Escalante would not disclose the location of the cosmic ashtray. This would discourage visitors and put those undeterred visitors in jeopardy.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Wright	Toni	The RAF	Component of alternative proposed; travel management	I understand the BLM is considering closure of nine backcountry airstrips in Utah. Not only would this have a negative impact on the surrounding communities, it would restrict search and rescue, fire fighting efforts, and emergency landing areas for distressed aircraft. The types of aircraft using these areas are extremely low impact and do not cause any nuisance. There can be no benefit from these closures	N/A
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; specially designated areas	The agency should adequately consider that lands designated by congress for multiple-use should not be managed by wilderness standards.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	Goal 1 Protect intact ecosystems and relict vegetation through designation of ACECs that represent the diversity of landscapes and ecosystems across the Monument.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	Goal 2 Protect and foster recovery of places already designated as outstanding natural areas, which are Devils Garden ONA, Escalante Canyons ONA, North Escalante Canyon ONA, The Gulch ONA and Phipps-Death Hollow ONA.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	Goal 3 Protect and foster recovery (from excessive livestock impacts) of the Wolverine Petrified Wood Natural Environmental Area.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	Goal 4 Protect the relict vegetation and functioning ecosystems of sky islands of the Monument, including No Mans Mesa, Little No Mans Mesa, Big Bowns Bench, Spring Point, and Smoky Mesa. This includes preventing establishment or slowing the spread of non-native plants on these mesas. Objectives - Conduct surveys for rare plants on No Mans Mesa, Little No Mans Mesa, Big Bowns Bench, Spring Point, and Smoky Mesa.	Appendix B - RNA Proposals.pdf



Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	Goal 5 Establish the Seaman's Wash-Petrified Hollow ACEC to protect fragile gypiferous soils, biological soil crusts, and rare endemic gypsophila plants from surface disturbance from grazing, OHV use, and vegetation treatments.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	LWC-1: Continually update lands with wilderness characteristics inventory across the Monument.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	LWC-2: Manage all BLM-identified lands with wilderness characteristics to protect those characteristics.	GESNM_Scoping_Comments.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	LWC-3: Designate new Wilderness Study Areas within existing BLM-identified lands with wilderness characteristics.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	LWC-4: Do not establish new mechanized or motorized routes and trails within lands with wilderness characteristics.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	LWC-5: Update inventory and manage the 54,400 acres of former Utah School and Institutional Trust Lands Administration (SITLA) sections completely surrounded by or connected to Wilderness Study Areas for preservation of their wilderness character.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	LWC-6: Consult with Tribes regarding identification and management of lands with wilderness characteristics, to the extent legally permissible.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	SPEC-1: Designate the White Cliffs ACEC and implement necessary special management prescriptions.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	SPEC-10: Consult with Tribes about identification and management of areas with special land designations.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	SPEC-2: Designate the Warm Creek ACEC and implement necessary special management prescriptions.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	SPEC-3: Designate the Willis Creek ACEC and implement necessary special management prescriptions.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	SPEC-5: Build fence around Devils Garden ONA parking lot with entry points to funnel visitors to designated trails. Install signs encouraging visitors to stay on existing trails, or rock surfaces. Block social trails that are redundant and where erosion is occurring.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	SPEC-6: Exclude livestock from The Gulch ONA to allow the stream and riparian habitat to recover.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	SPEC-7: Exclude livestock from the Wolverine Petrified Wood Natural Environmental Area to allow this area to recover.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	SPEC-8: Designate Little No Mans Mesa, Big Bowns Bench, Spring Point, and Smoky Mesa as Research Natural Areas.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	SPEC-9: Campfires shall not be allowed on No Mans Mesa, Little No Mans Mesa, Big Bowns Bench, Spring Point, and Smoky Mesa RNAs, and other relict plant areas as they are identified [see CAMP-6 in 2000 MMP and REC-2 in 2020 RMP].	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; specially designated areas	we emphasize that BLM can and should continue to designate new WSAs, including all BLM-identified lands with wilderness character.	Appendix B - RNA Proposals.pdf
Woodward	Katie	N/A	Component of alternative proposed; specially designated areas	I would also like to highlight recreation-specific research which pertains to section 2.23.2 Management Actions for Wilderness Study Areas. The action states to manage all WSAs and ISAs as OHV limited areas. By allowing motorized access in WSAs and ISAs, the RMP works against its stated goal of managing such areas so that their suitability for wilderness designation is not impaired. It is well-documented that OHV use degrades arid landscape quality in multitudes of ways, including the increased spread of non-native plants, loss of desert soils, wildlife habitat fragmentation, and contribution to wind erosion and toxic dust emissions. The southwestern U.S. is predicted to become up to five degrees warmer and 20% dryer by 2100; this change increases the vulnerability of ecosystems to the stressors from OHVs and makes restoration following disturbance extremely difficult. In light of this information, researchers specifically recommend that managers not designate routes in lands managed to protect wilderness characteristics and WSAs.	Woodward_GSENMcomment.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Meizen	Thomas	N/A	Component of alternative proposed; specially designated areas	My favorite place in Grand Staircase- Escalante is a little-known plateau called Big Bowns Bench, which I would suggest merits designation as a research natural area (RNA). Due to its extreme inaccessibility, Big Bowns Bench has escaped the impacts of cattle grazing for many decades, and thus provides an important comparative example of the Monument without grazing. Without places like Big Bowns Bench available for research, estimating land health baselines is very difficult, as nearly all the rest of GSENM is grazed. Please consider designating Big Bowns Bench as a research natural area.	N/A
Woodward	Katie	N/A	Component of alternative proposed; specially designated areas	This research underscores the urgent need for management efforts which help maintain the ecological integrity of wilderness-type areas on a landscape scale. The current draft language undermines this consensus by specifically blocking future opportunities to increase protections. Pursuant to the National Landscape Conservation System (NLCS) under which the monument is administered, the primary objective on this landscape is a commitment to conservation and resource protection using a scientific foundation for decision making. With several contiguous WSAs surrounded by undeveloped areas, GSENM has an opportunity to manage toward large-scale wilderness protections. As is such, any areas with wilderness characteristics should be managed specifically with heightened protections not only to preserve those qualities but to enhance them in the long-term.	Woodward_GSENMcomment.pdf
Stacey	Craig	N/A	Component of alternative proposed; specially designated areas	Expand wilderness study areas where appropriate.	1451.jpg
J	A	N/A	Component of alternative proposed; specially designated areas	I would also like to see funding and intent for analyzing the cumulative effects of exceptions granted in Wilderness and WSAs. Limiting group size is huge and absolutely must be capped at 12. Non-wilderness group sizes must also be capped - I suggest 15, but 25 is probably more reasonable. It would be great if this plan included funding to enforce this group size with patrols. All of the WSAs and surrounding lands must be managed for preservation of wilderness characteristics and additional lands identified as wilderness-like considered for creation or addition to existing WSAs. Designate new Wilderness Study Areas within existing BLM-identified lands with wilderness characteristics.	GSENM_20220923.pdf
Anderson-Schwartz	Pat	N/A	Component of alternative proposed; specially designated areas	Preserve the highest quality of night skies possible and consider them a priority as any new growth or lighting is encroaching within or around monument boundaries.	BLM Comments.docx
Goodell	Nancy	N/A	Component of alternative proposed; specially designated areas	would like to see the management direction for GSENM be focused on existing wilderness preservation: no or few new/improved roads, increased wilderness monitoring, reduced grazing, no chaining and no non-native plant introductions. Please designate wilderness study areas to assure protection of these lands.	N/A
Worthy	Crista	N/A	Component of alternative proposed; specially designated areas	Any place that can, should be designated at a wilderness study area.	N/A
Woodbury	Deborah	N/A	Component of alternative proposed; specially designated areas	Codify remaining wilderness quality areas as wilderness study areas.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Component of alternative proposed; specially designated areas	Special Land Designations for Conservation and Protection: There are many useful designations and we hope that use of these conservation and protection tools will not limit access or collecting activities for tribal members.	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; specially designated areas	Special Land Designations for Conservation and Protection According to the Summary of Management Concerns, the entirety of the GSENM is with the National Lands Conservation System (NLCS), which places an additional layer of "protection" over the whole GSENM. While the Notice of Intent, or Scoping Document, calls for nominations of Areas of Critical Environmental Concern (ACECs) any further land use designations would become superfluous if the GSENM is already coated in two restrictive land use designations (i.e., Monument status and NLCS). The State would therefore discourage any further land use designations being placed within the boundaries of the GSENM.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Feinberg	Jackie	The Pew Charitable Trusts	Component of alternative proposed; specially designated areas	BLM should also include ACEC nominations as part of its MMP alternatives, including but not limited to the Seaman's Wash-Petrified Hollow, Warm Creek, White Cliffs, and Willis Creek nominations that have been submitted by Southern Utah Wilderness Alliance and Grand Canyon Trust.	Pew Comments-GSENM Scoping-9-27-22.pdf
King	Catherine	Utah Native Plant Society	Component of alternative proposed; specially designated areas	Allotments along the Paria River area have the globally imperiled endemic plant Tropic goldeneye (Heliomeris soliceps) as well as other rare plants including currantleaf globemallow (Sphaerlacea moorei), Stood's phacelia or beautiful scorpionweed (Phacelia pulchella var. sabulonum), Kaiparowits milkvetch (Astragalus malacoides) and Paria spurge (Euphorbia nephradenia). UNPS strongly believes that this habitat should be preserved, and degradation of this habitat by cattle should be prevented. Thus we propose that the Gravelly Hills Pasture of the Cottonwood Allotment be allocated as unavailable for grazing to protect these rare plants.	UNPS on GSENM 2022 (1).docx

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Murray	Michael B.	Coalition to Protect America's National Parks	Component of alternative proposed; grazing	Grazing Management Inside Glen Canyon National Recreation Area Glen Canyon operates under the same NPS Organic Act of 1916 as national parks, monuments, and historic sites with the fundamental purpose to ".... conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." Although the enabling legislation for Glen Canyon states that the administration of grazing leases within the recreation area shall be by BLM, it is also explicit that BLM administration of grazing inside Glen Canyon is subject to the provisions of the Organic Act i.e. with no resulting impairment to park values and purpose. Several agreements between BLM and NPS ("Umbrella" Memorandum of Understanding 1984 Between Bureau of Land Management and National Park Service, Interagency Agreement between Bureau of Land Management and National Park Service for Grazing Management on Glen Canyon National Recreation Area) also state that before authorizing a grazing activity within Glen Canyon, NPS must determine if recreation area values and purposes are affected, a process called a "Values and Purposes Determination". In addition to the purpose of the NRA described above, the values of the recreation area have been defined by NPS as the vegetation, soil, water quality, wildlife, archaeological, historic, paleontological, scenic and recreation resources that make up the scenic, scientific, and historic features which define the outdoor recreational use and enjoyment of Glen Canyon. Glen Canyon Grazing Mgmt. Plan 1999 at 2. The Bureau of Land Management (BLM) must clarify the decision-making process for grazing inside the recreation area and demonstrate how the EIS process adheres to the grazing management agreements with NPS and obligations of each agency. The RMP should incorporate appropriate guidelines for ensuring non-impairment and protection of Glen Canyon values and purpose and grazing management in the NRA should be approved by the National Park Service and consistent with their recommendations.	NPCA & Coalition GSE RMP scoping FINAL.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	BLM management does not fully incorporate the Glen Canyon NRA obligations to protect its values and purposes and appears not to fully address necessary NPS management recommendations. For these reasons, the BLM, in coordination with Glen Canyon NRA staff, should develop alternatives regarding grazing management of all allotments overlapping the NRA for the Draft EIS that will properly protect the values and purposes for which the NRA was established. Grazing management in the NRA should be approved by the National Park Service and consistent with their recommendations.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	Both Proclamation 6920 and 10286 identify canyon bottom plant communities as a Monument object. Riparian vegetation in the Escalante canyons and Kaiparowits Plateau canyons is also specifically called out as a Monument object, as are Willis Creek, Lick Wash and Bull Valley Gorge. Furthermore, the 1996 Proclamation identifies scarce and scattered water sources in general as a Monument object, as well as the upper Paria Canyon system and wildlife that concentrate around the Paria and Escalante Rivers and other riparian corridors. We believe that proper protection of these Monument objects calls for management modifications in specific circumstances. In particular, we are concerned with confined grazing in narrow riparian canyon bottoms where little or no upland vegetation is present to reduce grazing pressure in the riparian canyon bottoms. We have regularly observed significant degradation of these confined riparian canyon bottom plant communities due to continuous livestock presence extending over months. We do not think that confined grazing in such sites is consistent with the proper protection of these Monument objects. We recognize that some of these areas provide important water sources for cattle. Water access could still be provided through short water gaps where needed. This would still likely result in degradation of the water gap area but would provide protection for the rest of the riparian canyon bottom. We propose that the following areas, which meet the criteria of narrow riparian canyon bottoms with little to no adjacent upland vegetation, be allocated as unavailable for grazing, while potentially allowing for water gap access: - The Gulch from the Burr Trail south to the Escalante River - The Gulch from the Burr Trail north to access from the Circle Cliffs - Deer Creek from the Burr Trail south to the Escalante River - Boulder Creek from the Monument boundary south to the Escalante River - Dry Hollow Pasture in Boulder Creek allotment (also mentioned above) - Henrieville Creek from near the confluence of Shurtz Bush Creek to approximately (37.592070, -111.929305), where the canyon widens - Hackberry Canyon (and tributary canyons) from Cottonwood Creek north to and including Round Valley Draw narrows -Paria River (and tributary canyons) from Little Dry Valley south to Kitchen Canyon - Starlight Canyon from its head to Kitchen Canyon - Willis Creek and Sheep Creek from Skutumpah Road south to Paria River - Bull Valley Gorge from Skutumpah Road southeast to Paria River - Lick Wash from Skutumpah Road southeast to Park Wash - Fourmile Canyon from Fourmile Water to Tommy Canyon - Halfmile Canyon from its head to Tommy Canyon - Buckskin Gulch from Hwy 89 to House Rock Valley Road	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	Furthermore, separate and apart from this forage-reallocation clause, President Biden's proclamation (unlike Proclamation 6920 first establishing the Monument) specifies that livestock grazing be managed "consistent with the care and management" of Monument objects. On that score, all these lands for which grazing privileges were relinquished include rare and fragile riparian "oases in an otherwise arid environment", and they support canyon bottom plant communities, both Monument objects. Proclamation 10286 also explicitly mentions Death Hollow and Sand Creek as Monument objects. These perennial water sources occur in Antone Flat (previously unallotted; see above), Saltwater Creek, and McGath Point allotments. Allocating these lands as unavailable for grazing or unallotted would honor the paramount importance given to these Monument objects by the Proclamation. This would also serve to encourage creative efforts by people with rival interests in public lands to resolve their differences in a productive way. Finally, allocating these lands as unavailable for grazing or unallotted is the right thing to do as a matter of equity in light of past agreements and resources expended. We propose that these areas be allocated as unavailable or unallotted in the RMP under consideration. - Big Bowns Bench Allotment, Horse Canyon - 666 acres (previously unallotted/trailing only) - Deer Creek Allotment, Cottonwood Pasture - 4,753 acres (previously unavailable) - McGath Point Allotment - 3,132 acres (previously unavailable) - Salt Water Creek Allotment - 12,055 acres (previously unavailable) - Steep Creek Allotment - 7,550 acres (previously unavailable)	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	Given that Proclamation 10286 identifies new objects to be protected, and requires the BLM to "manage livestock grazing...consistent with the care and management of the objects identified above and in Proclamation 6920", status quo grazing, including renewal of grazing permits, should not continue without an in-depth analysis to determine whether the authorized grazing is compatible and consistent with the proper care and management of Monument objects. This consistency analysis should be made available for public comment.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	Goal 1 Restore and maintain soils, hydrology, and native vegetation to promote long-term ecosystem sustainability.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	Management Actions I- GRAZ-I: Allocate the following areas as unavailable for grazing [from GRA-3, 4, 5 in 2020 RMP]: - Phipps Allotment, Upper River Pasture - Phipps Allotment, Lower River Pasture - Big Bowns Bench, River Pasture - Deer Creek Allotment, River Pasture - Rattlesnake Bench Allotment - Willow Gulch Allotment (Lower Calf Creek Falls pasture) - Harvey's Fear Allotment - Navajo Bench - Rock Creek-Mudholes Allotment, Dry Rock Creek Pasture - Spencer Bench - No Mans Mesa	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	Objectives - Analyze the effects of livestock management (e.g., percent utilization, stocking rate, season of use) on Monument soils, hydrology, and biotic resources. - Over the next 20 years, all grazing permits will gradually be renewed in accordance with NEPA. BLM will conduct a rangeland health analysis, using an interdisciplinary team, on each allotment and provide for public input in the permit renewal process. - Determine effectiveness and impacts of range infrastructure.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	Proclamation 10286 identifies critical habitat for southwestern willow flycatcher along the Paria River and the globally imperiled endemic plant Tropic goldeneye as Monument objects. We believe that this habitat should be preserved, and degradation of this habitat by cattle should be prevented. Thus, we propose that the Gravelly Hills Pasture of the Cottonwood Allotment be allocated as unavailable for grazing to protect southwestern willow flycatcher designated critical habitat and Tropic goldeneye populations, which are impacted by livestock trampling (see Special Status Species section below for more detail). This could also benefit these other rare plants documented in this Gravelly Hills Pasture: currantleaf globemallow (Sphaerlacea moorei), Stood's phacelia or beautiful scorpionweed (Phacelia pulchella var. sabulonum), Kaiparowits milkvetch (Astragalus malacoides) and Paria spurge (Euphorbia nephradenia).	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	Proclamations 6920 and 10286 identify biological soil crust as a Monument object. We believe that areas with undisturbed, well-developed biocrust (characterized by dark cyanobacteria and moss or lichen) should be preserved, and trampling by cattle should be prevented. Thus, we propose that the following areas be allocated as unavailable for grazing: - "Carmel Top Mesa" on Brigham Tea Bench, located at (37.775931, - 111.338670) - Durfey Mesa Pasture of King Bench Allotment	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	The following areas were allocated as unavailable for grazing or unallotted prior to the 2020 RMP. The Agency provided no justification for reversing course in the 2020 RMP. We propose that these areas be allocated as unavailable or unallotted in the RMP under consideration. - Antone Flat - 15,032 acres (previously unallotted/trailing only) - Boulder Creek Allotment, Dry Hollow Pasture - 1,273 acres (previously unavailable) - Upper Paria, South Pasture - 16,813 acres (previously unallotted) - Varney Griffin - 15,261 acres (previously unallotted) - White Sage - 321 acres (previously unallotted) - 6 small portions of Escalante River Allotment, Silver Falls Pasture - 1406 acres total (previously unavailable) - 2 small portions of Rock Creek-Mudholes Allotment, Dry Rock Creek Pasture - 378 acres total (previously unavailable) - small portion of Long Neck Allotment - 226 acres (previously unavailable) The grazing privileges for the following areas were previously relinquished based on willing seller-willing buyer agreements under which several ranchers received compensation to allow them to retire, relocate, or reconfigure their operations. As a result of those agreements, and after a public-planning process, BLM chose over two decades ago to allocate these areas as unavailable or unallotted for grazing, finding that the Monument would benefit-with a healthier river, better wildlife habitat, recovered fisheries, and a wilder place to explore and find solitude.51 The 2020 RMP reversed course, designating these allotments as available for grazing. In neither the 2020 RMP nor any of the associated planning documents did BLM acknowledge this history or provide a reason for undoing these voluntary relinquishments. 51 BLM, Utah State Office, Escalante Management Framework Plan Approved Amendment and Decision Record, 2 (Mar. 15, 1999); BLM, Grand Staircase-Escalante National Monument, Environmental Assessment: Proposed Plan Amendment - Grazing, 16-19 (Dec. 7, 1998). Given this history, it is our view that BLM should, as an equitable matter, treat these relinquishments on equal footing as voluntary relinquishments made under Proclamation 10286. Put another way, we urge the Agency not to reallocate forage on these allotments unless, as Proclamation 10286 directs, doing so will advance the purposes of Proclamation 10286 and Proclamation 6920.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	The following areas were forage reserves, also created as a result of permit relinquishments 20 years ago, that were made available for grazing in the 2020 RMP. Again, in the planning documents that led to the 2020 RMP, BLM did not acknowledge the history behind the creation of these forage reserves and did not provide an explanation for undoing them. Re-allocating these lands as forage reserves in the current planning process is the right thing to do as a matter of equity in light of past agreements and resources expended. We propose that these areas be allocated as forage reserves in the RMP under consideration. - Deer Creek Allotment, Wolverine forage reserve - 3,816 acres - Little Bowns Bench forage reserve - 3,422 acres - Phipps forage reserve - 7,365 acres	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	Drought is a perennial management concern and will only become more so as precipitation and temperature patterns change. Predicting drought and implementing livestock management policies before impacts become severe and permanent requires that the Agency develop a formal drought management plan. Without one, it is difficult to make and enforce necessary livestock management protocols; often, livestock decisions about turning out or early removal are delayed for too long. GSENM should include a drought management plan with specific, defined decision thresholds prescribing management actions. For example, GSENM should continually monitor drought conditions and assess appropriate management actions in a timely fashion. The following is our proposal for simple and clear management direction during drought based on the U.S. Drought Monitor: - Extreme (D3) and Exceptional Drought (D4) - If an allotment has been mapped as D3 or D4 for one month prior to the beginning of the grazing season, livestock will not enter the allotment. - Livestock on an allotment will exit if the allotment is mapped as D3 or D4 for two successive weeks. - If drought intensity decreases for two successive weeks to D2, criteria for D2 will be applied. - Severe Drought (D2) - If an allotment has been mapped as D2 for at least one month prior to the beginning of the grazing season, the overall time period of authorized grazing will be reduced by 50%, accompanied by a corresponding reduction in AUMs. - If the drought intensity in an allotment increases from D0 or D1 to D2 for at least one month during the grazing season, the remaining period of use will be reduced by 50%, accompanied by a corresponding reduction in AUMs. - Livestock on an allotment will exit if the allotment is mapped as D3 or D4 for two successive weeks during the grazing season. - Abnormally Dry (D0) and Moderate Drought (D1) - During D0 and D1, requests for non-use or reduced use due to drought shall be approved. Where non-use due to drought has been approved, applications from others to utilize the forage shall be denied.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	Goal 2 Grazing management will be based on objective, justifiable, scientific principles and will protect culturally significant resources to Tribes including archaeological resources, springs, and culturally significant plants.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	Grazing can have significant climate impacts. Cattle consume carbon through herbaceous and woody vegetation, trample biological soil crusts, reduce carbon storage on the land, and emit methane, a much more potent greenhouse gas than carbon dioxide, as a result of their digestive processes. <sup>67</sup> The Draft EIS should provide an analysis of the respective climate contribution of authorized grazing under each alternative considered. The Council on Environmental Quality's current guidance on the consideration of greenhouse gas (GHG) emissions and the effects of climate change (which is under revision) specifically addresses the need to assess biogenic GHG emissions from land management activities such as grazing. 67 See Kauffman, J.B., Beschta, R.L., Lacy, P.M., & Liverman, M. (2022). Livestock Use on Public Lands in the Western USA Exacerbates Climate Change: Implications for Climate Change Mitigation and Adaptation. Environmental Management 69, 1137-1152.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	Proclamations 6920 and 10286 identify relict plant communities as Monument objects. These relict plant communities should be preserved, and incursion by cattle should be prevented. Similar to No Mans Mesa RNAs, we propose that Little No Mans Mesa, Spring Point, and Smoky Mesa proposed RNA areas be allocated as unavailable for grazing: - Little No Mans Mesa RNA - Spring Point RNA - Smoky Mesa RNA	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	The following areas were allocated as unavailable for grazing in the 2020 RMP [GRA-3, 4, 5]. We propose that these areas remain unavailable in the RMP under consideration. In making that proposal, we'd like to stress that some of these areas (the pastures on Phipps, Big Bowns Bench, and Deer Creek) were closed to grazing two decades ago owing to voluntary agreements worked out by ranchers and conservationists in the late 1990s that led ranchers to relinquish their grazing privileges so that BLM could more easily designate the underlying lands as unavailable for grazing. While these areas deserve to remain free of grazing regardless, given the history that led to their initial retirement from grazing, we encourage BLM to treat them in a manner equivalent to lands retired from grazing via voluntary relinquishments made under Proclamation 10286. - Phipps Allotment, Upper River Pasture - Phipps Allotment, Lower River Pasture - Big Bowns Bench, River Pasture - Deer Creek Allotment, River Pasture - Rattlesnake Bench Allotment - Willow Gulch Allotment (Lower Calf Creek Falls pasture) - Harvey's Fear Allotment - Navajo Bench - Rock Creek-Mudholes Allotment, Dry Rock Creek Pasture - Spencer Bench - No Mans Mesa	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-18: Conduct studies comparing resource conditions before and after installation of range infrastructure.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-10: Dysfunctional range infrastructure that is not scheduled to be returned to use will be removed.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-11: Establish a system of ungrazed reference areas across the Monument, including unavailable areas and exclosures.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-12: Develop a formal drought management plan.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-13: No allotments will be converted from cows and horses to domestic sheep or goats within at least a 9 mile buffer of bighorn sheep habitat, except where topographic features or other barriers prevent physical contact. This is in order to prevent the spread of disease from domestic sheep to desert bighorn sheep and is consistent with BLM Manual MS 1730 Rel. No. 1-1771. [see p. 42 in 2000 MMP.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-14: Develop a schedule of permit renewals that will be processed according to NEPA requirements (e.g., rangeland health assessments and public comment periods). At least three permit renewals per year will comply with NEPA regulations.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-15: Offer Tribes the opportunity to meaningfully engage in discussions about range management if so desired.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-16: Monitor potential impacts of grazing on cultural sites. Develop a plan to keep cattle away from cultural sites where adverse impacts are occurring or likely to occur.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-17: At a minimum, when the permit is renewed, conduct a forage capacity analysis on each allotment based on habitat condition, degree of recovery where needed, recently measured forage production, and grazing use to determine accurate forage capacity and adjust AUMs if necessary.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-19: For lands inside the Glen Canyon National Recreation Area, livestock grazing practices will be approved by the National Park Service and consistent with their management requirements. Any grazing permit in the NRA should be co-signed by the National Park Service.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-2: Allocate the following areas as unavailable for grazing or unallotted: - Antone Flat - 15,032 acres (previously unallotted/trailing only) - Boulder Creek Allotment, Dry Hollow Pasture - 1,273 acres (previously unavailable) - Upper Paria, South Pasture - 16,813 acres (previously unallotted) - Varney Griffin - 15,261 acres (previously unallotted) - White Sage - 321 acres (previously unallotted) - 6 small portions of Escalante River Allotment, Silver Falls Pasture - 1406 acres total (previously unavailable) - 2 small portions of Rock Creek-Mudholes Allotment, Dry Rock Creek Pasture - 378 acres total (previously unavailable) - small portion of Long Neck Allotment - 226 acres (previously unavailable) - Big Bowns Bench Allotment, Horse Canyon - 666 acres (previously unallotted/trailing only) - Deer Creek Allotment, Cottonwood Pasture - 4,753 acres (previously unavailable) - McGath Point Allotment - 3,132 acres (previously unavailable) - Salt Water Creek Allotment - 12,055 acres (previously unavailable) - Steep Creek Allotment - 7,550 acres (previously unavailable)	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	-GRAZ-20: Give priority in the Monument's science program to validate Agency monitoring and analysis practices to ensure that these practices adequately assess the impairment of Monument objects and values.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-3: Allocate the following areas as unavailable for grazing: - The Gulch from the Burr Trail south to the Escalante River - The Gulch from the Burr Trail north to access from the Circle Cliffs - Deer Creek from the Burr Trail south to the Escalante River - Boulder Creek from the Monument boundary south to the Escalante River - Dry Hollow Pasture in Boulder Creek allotment (also mentioned above) - Henrieville Creek from approximately (37.613746, -111.896125) to (37.592070, -111.929305), where the creek flows through a narrow canyon - Hackberry Canyon from Cottonwood Creek north to and including Round Valley Draw narrows - Paria River from Little Dry Valley south to Kitchen Canyon - Willis Creek and Sheep Creek from Skutumpah Road south to Paria River - Bull Valley Gorge from Skutumpah Road southeast to Paria River - Lick Wash from Skutumpah Road southeast to Park Wash - Buckskin Gulch from Hwy 89 to House Rock Valley Road - Little No Mans Mesa RNA - Spring Point RNA - Smoky Mesa RNA - "Carmel Top Mesa" on Brigham Tea Bench, located at (37.775931, -111.338670) - Durffey Mesa Pasture of King Bench Allotment - Gravelly Hills Pasture of Cottonwood Allotment	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-4: Allocate the following areas as forage reserves: - Deer Creek Allotment, Wolverine forage reserve - 3,816 acres - Little Bowns Bench forage reserve - 3,422 acres - Phipps forage reserve - 7,365 acres	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-5: Grazing permit renewals will include a site-specific compatibility analysis that is made available for public comment.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-6: Utilize Annual Operating Instructions for grazing management on each allotment. Such annual instructions should summarize the results of recent monitoring, describe evidence of changes relative to rangeland health standards, describe past grazing use, list problems and challenges, and describe grazing practices proposed for the next season. These should be public by way of the web.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-7: In allotments where the plant community is at its ecological potential in terms of diversity and productivity, grazing utilization will be limited to 30% of upland herbaceous species (native grasses and forbs) across the Monument. Allotments below ecological potential may need utilization levels below 30%.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-8: Range infrastructure must be maintained, and fences up and functional, before yearly turnout will be permitted. Infrastructure essential to the proper management of an allotment that is not in working order may be grounds for removal of animals from the allotment.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; grazing	GRAZ-9: All new fencing will utilize the most up-to-date wildlife-friendly specifications.	Appendix B - RNA Proposals.pdf
Shu	Lyn	Highway 84 LLC	Component of alternative proposed; grazing	Cattle grazing should be protected and promoted in all of GSENM. Cattlemen provide law enforcement and cheap guides, and help keep roads and trails open. Cattlemen provide the economy with goods, services and protect historic ranching skills. Alternative 7.1 encourages cattlemen to voluntarily relinquish cattle permit. This is awful! We love rodeos, horse races, and we feel domestic cattle should be treated as an 'endangered species' as the skills needed to wrangle cattle in the wild is a difficult profession.	N/A
Esplin	Eric	Kane County Conservation Board of Directors	Component of alternative proposed; grazing	The conservation district strongly encourages maintaining historical grazing permits (AUMs) that are protected under the original monument designation of 1996. Livestock grazing is a vital resource management tool that is culturally and economically important to our district, county, and region. A rich livestock ranching heritage is a critical component and attribute to the original GSENM declaration and mission.	N/A
WARD	EVERETT	N/A	Component of alternative proposed; grazing	BLM should permanently retire currently un-grazed and restored areas within the Monument from future livestock use. I have seen firsthand the erosion, introduction of invasive species and fouled water from grazing which has no reasonable and sensible place in a Monument.	N/A
C	Peter	N/A	Component of alternative proposed; grazing	BLM should permanently retire currently un-grazed and restored areas within the Monument from future livestock use.	N/A
Meizen	Thomas	N/A	Component of alternative proposed; grazing	From an ecological perspective, the biggest threat to the monument's birds, plants, and insects is cattle grazing, and the recent re-opening of closed (voluntarily retired) lands and canyon bottoms to grazing under the Trump administration is a travesty that must be reversed. Where cattle allotments remain, ranchers should be limited to 30% utilization. If properly enforced, this science-backed utilization level prevents overgrazing and ensuing loss of healthy ecosystems, causing serious ecological damage across GSENM. The Monument's biodiversity is concentrated in its riparian areas, where cattle prefer to spend their time and where they do the most damage. With multi-year droughts becoming the norm in southern Utah, cattle pose an even bigger threat to these areas. Grand Staircase's beautiful canyon bottoms should be a place for hikers, birds, plants, insects, and native mammals-not the trampling hooves of bovines.	N/A
Sjogren	Morgan	N/A	Component of alternative proposed; grazing	Grazing Permit Relinquishment Proclamation 10286 says that the Secretary of Interior "shall" retire from livestock grazing the lands covered by permits that are voluntarily relinquished. This needs to be included in all RMP options, and no further analysis of alternatives is necessary in relevant cases.	40 Mile Gulch _ 2 May 2020.pdf
Sjogren	Morgan	N/A	Component of alternative proposed; grazing	Grazing Permit Renewal All grazing permit renewals should be required to follow the full NEPA process, without exception.	40 Mile Gulch _ June 2018.pdf
Wuerthner	George	N/A	Component of alternative proposed; grazing	I would like the BLM to includede a voluntary buyout provision with permanent retirement of livestock grazing privileges.	N/A
Brown	James Norris	N/A	Component of alternative proposed; grazing	My family and I have been livestock permittees on the GSENM for over 60 years and with multiple uses the land has continued to improve. As a rancher, I have seen what non-use has done to our parks and forests. Responsible use-management is in the best interest to the county and local residents who have relied on these lands for their livelihood, traditions and lifestyle for over 175 years. The Federal Government is legally mandated to work with local governments and respect the people who work and develop the resources on the GSENM. As a fourth-generation rancher, livestock grazing on these historic lands should continue.	Brown - BLM Comments - September 2022.docx
Kloetzel	Steven	N/A	Component of alternative proposed; grazing	Please incorporate drastic reductions to livestock grazing in your RMP, or outright removals or termination.	GSENM RMP.EIS Comment Card_20220729_sk.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Sjogren	Morgan	N/A	Component of alternative proposed; grazing	The BLM needs to do a complete assessment of all grazing allotments to determine these impacts. A full NEPA process and Tribal input needs to be required before grazing permits are renewed. The BLM should designate areas where grazing is not allowed that can serve as reference/research areas; create a grazing plan for drought conditions. Proclamation 10286 lists Death Hollow and Sand Creek as monument objects, and includes in Antone Flat, Saltwater Creek, and McGath Point allotments. These areas should be unavailable for grazing or unallotted would honor the paramount importance given to these monument objects by the proclamation. I have hiked in these allotment areas, and observed that these areas all contain springs, perennial creeks, cultural sites, and riparian plants that are vulnerable to grazing impacts and considered monument objects. The following areas in GSENM should remain unavailable for cattle grazing: Phipps Allotment, Upper and Lower River Pasture, Big Bowns Bench, River Pasture; Deer Creek Allotment, River Pasture; Rattlesnake Bench Allotment; Willow Gulch Allotment (Lower Calf Creek Falls pasture); Harvey's Fear Allotment; Navajo Bench; Rock Creek-Mudholes Allotment, Dry Rock Creek Pasture; Spencer Bench; No Mans Mesa. I have hiked in most of these. All past relinquishments of grazing privileges should be listed in the new RMP. These allotments should not be reallocated unless it advances the purposes of the monument proclamations, which is unlikely considering the grazing impacts for native flora and rare and fragile riparian oasis areas within the monument. The following areas were allocated as unavailable for grazing or unallotted prior to the 2020 RMP. These areas should be listed as unavailable or unallotted in the new RMP. All areas where grazing privileges were previously relinquished should also be off limits to grazing. This not only continues to protect areas deemed unsuitable for grazing but honors the original decisions to relinquish grazing rights. It also encourages ongoing creative land management solutions between very different user groups.	40 Mile Gulch May 2020.pdf
Not Provided	Remove the GSENM cattle	N/A	Component of alternative proposed; grazing	The new GSENM RMP should prohibit future cattle grazing. BLM managers have repeatedly proven that they cannot be trusted to properly manage GSENM grazing. They basically defer to what ranchers want. This is improper delegation of federal authority to manage federal lands and resources in a national monument. The GSENM RMP grazing ban is therefore a necessity to ensure the future required protection of monument objects and values.	Climate Change and Livestock Use on Public Lands 2022.pdf
Baruey	Wade	N/A	Component of alternative proposed; grazing	Keep grazing right open Do not cut.	N/A
Phillips	Bob	N/A	Component of alternative proposed; grazing	My second proposal is to prohibit cattle grazing within areas that contain cultural and archaeological sites, and paleontological resources. Because of their weight and proportionately small foot size, they can do considerable and irreparable damage to fossils, cultural artifacts, and archaeological sites very easily.	impacts of off-road vehicle noise on wildlife.pdf
Randolph	John	N/A	Component of alternative proposed; grazing	No Livestock grazing on monument property please. It is not worth it.	N/A
Anderson-Schwartz	Pat	N/A	Component of alternative proposed; grazing	Further reduce (carefully) the amount of land designated for grazing and livestock in response to continuing drought conditions which make raising cattle on this land even less sustainable than it has been from the start. This will reduce competition for foraging with native species. There may be a need for grazing on these lands for some time to come, but the amount of land so designated is too much and far out of balance with designations for less aggressive uses. We need to wean the cattle off these lands gradually and provide alternatives for local economies that are more sustainable and environmentally friendly.	BLM Comments.docx
Not Provided	Remove the GSENM cattle	N/A	Component of alternative proposed; grazing	I expect this NEPA analysis to be objective and comprehensive, and to include a No Grazing Alternative.	Climate & livestock on public lands_Beschta et al_2013.pdf
Zimmerman	Cliff	N/A	Component of alternative proposed; grazing	Moreover, BLM should permanently retire currently un-grazed and restored areas within the Monument from future livestock use.	N/A
Wallace	Katie	N/A	Component of alternative proposed; grazing	Please adhere to Proclamation 10286 and retire grazing lands as they are voluntarily relinquished. Keep the other grazing lands as designated, including historic use of administrative roads.	N/A
Sutter	Eileen	N/A	Component of alternative proposed; grazing	The Management Plan should permanently retire ungrazed and restored areas from future livestock use.	Comments for 2022729 GSENM RMP FR Notice of Intenet 2022.docx
Schell	Ronald	N/A	Component of alternative proposed; grazing	Please do retire unused areas to prohibit future cattle grazing.	N/A
Not Provided	BLM's grazing bias is wrong	N/A	Component of alternative proposed; grazing	The NEPA should include a No grazing and no range improvements alternative. BLM cannot legally allow uses that put monument objects at risk.	N/A
Not Provided	Not Provided	N/A	Component of alternative proposed; grazing	Honor previous grazing retirements. Sensitive lands that were voluntarily retired from grazing should again be closed to cows.	N/A
Not Provided	Not Provided	N/A	Component of alternative proposed; grazing	BLM should make all GSENM lands unavailable for cattle grazing in the new RMP.	N/A
Not Provided	Utah resident	N/A	Component of alternative proposed; grazing	The RMP should suspend or greatly reduce commercial livestock grazing and permanently retire vacant allotments and those where objects are threatened.	N/A
VanLonkhuyzen	Allison	N/A	Component of alternative proposed; grazing	Cows and grazing should NOT be allowed.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Not Provided	Not Provided	National Wildlife Federation and Utah Wildlife Federation	Component of alternative proposed; grazing	Clarify the process by which the BLM will retire livestock grazing permits upon voluntary relinquishment and how such permits might be reallocated. Proclamation 10286 requires the Secretary of the Interior to retire from livestock grazing the lands covered by any permits that are voluntarily relinquished: Should grazing permits or leases be voluntarily relinquished by existing holders, the Secretary shall retire from livestock grazing the lands covered by such permits or leases pursuant to the processes of applicable law. Per this language, retirement would be immediately effective upon voluntary relinquishment. While the BLM should revise its management plans to address such a change, revision is not necessary under Proclamation 10286 prior to retirement. Moreover, because Proclamation 10286 removes the agency's discretion to retire or not, an analysis considering the effects of retirement under the National Environmental Policy Act is not required.3 3 40 C.F.R. § 1508.1(q)(1)(ii); Dep't of Transp. v. Pub. Citizen, 541 U.S. 752, 770 (2004); Sac & Fox Nation of Missouri v. Norton, 240 F.3d 1250, 1262 (10th Cir. 2001); Alaska Wilderness League v. Jewell, 788 F.3d 1212, 1226 (9th Cir. 2015). Because retirements are not discretionary, the BLM need not address such actions while evaluating planning alternatives. The agency should include-perhaps in the background sections of its planning documents or as a management action common to all alternatives-the legal conclusions that flow from Proclamation 10286's mandatory provisions for voluntary-permit relinquishments. It is important to note that, for this provision to apply, a relinquishment must be voluntary and that Proclamation 10286 contemplates grazing continuing on the Monument in a way that allows for the care and management of Monument objects. Proclamation 10286 does grant the Secretary discretion to reallocate grazing under certain circumstances: Forage shall not be reallocated for livestock grazing purposes unless the Secretary specifically finds that such reallocation will advance the purposes of this proclamation and Proclamation 6920. The BLM should include a process in the Management Plan by which the agency will consider reallocation and whether it is consistent with Proclamations 10286 and 6920. Moreover, because this action is discretionary, a NEPA analysis would be necessary prior to such reallocation.	GSE Plan Scoping - NWF UWF Comment Letter September 2022.pdf
Not Provided	Not Provided	National Wildlife Federation and Utah Wildlife Federation	Component of alternative proposed; grazing	Permit responsible grazing of public lands in a way that minimizes harm to Monument objects. As provided in the Proclamation, grazing on the Monument should be managed in a way that does not negatively impact Monument objects. The BLM should consider reviewing authorized grazing to ensure consistency with Proclamation 10286. Such a review should consider other potential factors that may exacerbate the effects of grazing, including drought, climate change, increased visitor use and recreation. If range infrastructure, such as waterers and fencing, is defunct without intention of repairing or replacing, not needed as a result of a voluntarily permit relinquishment consistent with Proclamation 10286, or otherwise unnecessary, the BLM should prioritize removing such infrastructure.	GSE Plan Scoping - NWF UWF Comment Letter September 2022.pdf
Not Provided	Not Provided	National Wildlife Federation and Utah Wildlife Federation	Component of alternative proposed; grazing	The Management Plan should address the potential impacts that grazing may have on the Monument's historic, natural, and scientific objects. Proclamation 10286 permits grazing to continue on the Monument in a way that is consistent with the care and management of Monument objects. While the proclamation contemplates grazing continuing on the Monument, the agency should address in the Management Plan how impacts of such a use might be avoided or mitigated. The agency should also consider in its Management Plan the process by which it will retire voluntary permit relinquishments consistent with Proclamation 10286.	GSE Plan Scoping - NWF UWF Comment Letter September 2022.pdf
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Component of alternative proposed; grazing	We strongly support the goal of retiring livestock grazing permits as a comprehensive approach to the resource management of GSENM and the associated science mission.	N/A
Corbato	Steve	Oregonians For Wild Utah	Component of alternative proposed; grazing	o BLM should permanently retire currently ungrazed and restored areas within the Monument from future livestock use.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Component of alternative proposed; grazing	5.4.1. Current Conditions. "An additional 35,500 acres within the decision area are available for livestock grazing, but are not being grazed." WHY NOT? With only 101 permittees having permits, there should be ample opportunity to open these permits for young or new entrepreneurs. Opening ranching and grazing should be included in the laboratory desired on GSENM. It is a proven fact that cattle, clip, fertilize, water vegetation, as well as provide the public with range-fed quality beef! Allowing existing cattlemen or new ones to utilize the grazing allotments makes good sense. However, the Division of Wildlife Resources (DWR) must realize that they have a responsibility to keep competitive herbivores in check!	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Component of alternative proposed; grazing	7.1 "If grazing permits or leases are voluntarily relinquished by existing holders, the lands covered by such permits or leases would be retired from livestock grazing." This is a death wish! Livestock grazing was protected in the original proclamation, and GSENM should open those permits to new entrepreneurs who wish to graze cattle; to not do so is contrary to the purpose of the Proclamation. We understand that each and everything that goes wrong on GSENM is blamed on the cattlemen, and it is time for GSENM to change this approach to supporting them by ending grazing fees, rebuilding roads, and fences, cleaning out water sources, and generally, making better, more complimentary and hopeful reports.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Component of alternative proposed; grazing	7.1 The words relinquish, retired, reallocated, withdrew, no longer available, are obvious the intent of the BLM is negative!	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Component of alternative proposed; grazing	Ranching should have precedence and support, because it existed from 1875, which was more than fifty years before the Taylor-Grazing Act of 1934. Even though President Clinton kept cattle grazing in the original Proclamation, efforts to reduce and eliminate it continue.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Component of alternative proposed; grazing	Ranching in the canyons produced dairy and meat products but also provided a host of stewardship services benefiting the land. Ranching traditions should be an important part of GSENM.	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; grazing	12.7. Rangeland Health In addition to the social, economic, cultural, historical, and legal factors discussed above, proper livestock grazing also plays a major role in maintaining rangeland health. The land encompassed by the enlarged reservation requires active management in many ways. It requires active management to maintain healthy soils, safeguard against fire and floods, protect native vegetation from encroachment, and preserve wildlife habitats. The EIS should analyze the impacts of not undertaking rangeland treatments and projects within the GSENM. This reservation should not fate the ecosystem to deteriorating health.	GSENM RMP Scoping Comments 27SEPT2022.pdf



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Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; grazing	12.8. Livestock Management Plan As is clearly seen from the pages of analysis devoted to the topic thus far, grazing on the GSENM is a deep-rooted use of the land and one to which books could be written on the topic. As such, it is apparent that attempting to give livestock grazing a full analysis as part of the GSENM RMP planning process, it deserves extensive time, effort, and consideration. Here the State is concerned that by cramming the livestock grazing sector of this analysis into the current RMP/EIS that livestock grazing will not receive the deserved analysis and instead will result in hastily drawn conclusions and directives. As such, the State recommends that any form of livestock grazing management and trailing plan should be conducted separately from the current GSENM RMP planning process.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; grazing	Active management, or range projects that improve water distribution, vegetation cover and diversity, and soil health, is necessary for the land within the GSENM boundaries. It may be the best way to keep soils fertile as southern Utah soils need regular disturbance.(99) Active management was part of the Native American approach to the management of these lands and has continued to be part of current management. BLM needs to develop an alternative that allows for active management to better guard the ecosystem and the rangeland health in the monument boundaries. If traditional land-management stewards are prevented from proper management, the soils will gradually turn into lifeless dirt. Properly managing soils requires equipment, personnel, vehicles, and can include livestock. It can also involve the reduction of current vegetation to facilitate healthier growth in the future. The beneficial impacts of these types of management should be included in the EIS. A great example of the benefits of vegetation treatment can be observed along Skutumpah road in Kane County. On both sides of the road is federal land, the south side the GSENM, the north side Kanab field office. Active management on the north side of the road has resulted in significantly healthier rangeland than the non-active management south side of the road. On the GSENM side of the road the limited vegetation is stressed, decadent, and dying, while on the north side of the road the vegetation is healthy and lush.(100) (99) Restoring the Climate Through Capture and Storage of Soil Carbon Through Holistic Planned Grazing, Savory Institute 15 (2013), <a href="https://savory.global/wp-content/uploads/2017/02/restoring-the-climate.pdf">https://savory.global/wp-content/uploads/2017/02/restoring-the-climate.pdf</a> (100) Attach photo.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; grazing	As extensively analyzed, livestock grazing has existed on this landscape for more than a century. It is, in a way, part of the landscape and should be "protected" by this GSENM RMP. The rich history of cattle grazing in Southern Utah, including the lands encompassed by the monument, are part of the landscape not just mystically, but biologically as well. The fences that have been built and maintained, the water wells and ponds that have been developed, and the vegetation treatments that have been done and maintained have all had a biological effect on the landscape. Livestock grazing has turned over soil and minimized flammable underbrush in the monument. Cattle "break the soil cap with their hooves, fertilize it with urine and dung rich in gut bacteria, and trample plant matter into the soil surface, including dead grasses which when left standing and oxidizing interfere with new growth."(101) Grazing can stimulate biotic activity by facilitating circulation of oxygen, carbon dioxide, and other gases, by providing nutrients, allowing penetration of water, and providing land cover to minimize or eliminate bare ground.(102) BLM cannot ignore the positive impacts of livestock grazing on the lands within the GSENM in this EIS. It must set forth both the positive impacts on the rangeland and the wildlife that benefit from livestock watering sources and vegetation treatments, and the potential negative impacts from any proposed reductions in livestock occupancy to the rangeland and wildlife. (101) Restoring the Climate Through Capture and Storage of Soil Carbon Through Holistic Planned Grazing, Savory Institute 10 (2013) (Citing Weber & Gokhale, Effect of Grazing on Soil-Water Content in Semiarid Rangelands of Southeast Idaho, 75 J. of Arid Env'ts 464-470 (2011). (102) Id.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; grazing	Livestock grazing is an important use of BLM land, including the GSENM, established by law (Proclamation) and policy. A decision to reduce or eliminate livestock grazing on an allotment should only be made when resource conditions or unresolvable conflicts with other uses dictate. Because decisions to convert active grazing allotments to non-use or grassbanks have impacts beyond the BLM and the permittee, they should be made only when other affected interests, including county government, are involved."(89) (emphasis added). (89) Id. at 102.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; grazing	The BLM should recognize that grazing allotments may qualify as traditional cultural properties ("TCP") that are eligible for National Register consideration (i.e., historic properties) under some circumstances. These areas are "associat[ed] with cultural practices or beliefs of a living community that (1) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community." Minimally BLM should acknowledge this possibility and recognize that any proposal to permanently deny a permit renewal or make an allotment unavailable for grazing on a National Register-eligible TCP almost certainly would result in an adverse effect.	GSENM RMP Scoping Comments 27SEPT2022.pdf
King	Catherine	Utah Native Plant Society	Component of alternative proposed; grazing	Biological soil crust was identified as a monument object in both the Clinton and Biden proclamations. We believe that areas with undisturbed, well-developed biocrust (characterized by dark cyanobacteria and moss or lichen) should be preserved and trampling by cattle should be prevented. Areas such as Durffey Mesa Pasture of King Bench Allotment should be made unavailable to livestock.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Component of alternative proposed; grazing	Riparian and canyon bottom plant communities are described as a monument object in both Proclamation 6920 and 10286. Specifically the riparian vegetation in the Escalante canyons and Kaiparowits Plateau canyons are called out as a monument object, as are Willis Creek, Lick Wash and Bull Valley Gorge. We believe that proper protection of these canyon bottoms calls for management modifications in specific circumstances. UNPS does not think that confined grazing in such sites is consistent with the proper protection of these monument objects. Water access for cattle could still be provided through short water gaps where needed. This would still likely result in degradation of the water gap area, but would provide protection for the rest of the riparian canyon bottom. We propose that as many canyons and stream/riparian systems as possible be allocated as unavailable for grazing, while potentially allowing for water gap access including significant portions of Boulder Creek, Deer Creek, The Gulch, Henrieville Creek, Hackberry Canyon, Paria River, Starlight Canyon, Willis Creek, Sheep Creek, Bull Valley Gorge, Lick Wash, Fourmile Canyon, Halfmile Canyon, and Buckskin Gulch.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Component of alternative proposed; grazing	Areas that were allocated as unavailable for grazing in the 2020 Resource Management Plan should remain unavailable in the management plan including Lower River Pasture of Phipps Allotment, River Pasture of Deer Creek Allotment, Rattlesnake Bench Allotment, Harvey's Fear Allotment, Navajo Bench and Spencer Bench among others.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Component of alternative proposed; grazing	The areas allocated as unavailable for grazing or unallotted prior to the 2020 Resource Management Plan should remain unavailable, such as Antone Flat, Upper Paria, South Pasture, Varney Griffin, Boulder Creek Allotment, Dry Hollow Pasture and other smaller areas.	UNPS on GSENM 2022 (1).docx
Griffin	Simone	BlueRibbon Coalition	Component of alternative proposed; socioeconomics	In addition to a recreation alternative, the BLM should consider developing an alternative that corrects the disturbing socioeconomic trends that are taking root in the Western communities that call the areas surrounded by the GSENM areas home.	GSENM Resource Management Plan Scoping.docx-2.pdf

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Griffin	Simone	BlueRibbon Coalition	Component of alternative proposed; socioeconomics	The socioeconomic analysis should acknowledge the direct financial impact that will occur to organizations like ours if the agency were to adopt a "conservation alternative". The Administrative Procedures Act is important to a planning process such as the development of this plan, because this statute makes it clear that agency actions that are both contrary to "the constitutional right, power, privilege, or immunity;" or "in excess of statutory jurisdiction, authority, or limitations, or short of statutory right must be held unlawful." The plan should acknowledge these important statutory and constitutional provisions.	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Component of alternative proposed; socioeconomics	Allowing dispersed camping should also be seen as a management tool for offsetting the socioeconomic inequities that are taking root as ultra-wealthy residents displace lower- and middle-income individuals and families from accessing monument areas.	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Component of alternative proposed; socioeconomics	We strongly encourage the BLM to incorporate into their planning the findings of The Slums of Aspen: Immigrants vs. the Environment in America's Eden by Lisa Sun-Hee Park and David Pellow and Billionaire Wilderness: The Ultra-Wealthy and the Remaking of the American West by Justin Farrell. Both of these works document extensively how Western communities surrounded by public land are undergoing significant socioeconomic changes that result in skyrocketing housing costs, use of conservation and land-use restrictions to limit development, and displacement of the local middle and lower classes from Western Communities.	GSENM Resource Management Plan Scoping.docx-2.pdf
Cutler	Clayton	Kane County Utah	Component of alternative proposed; socioeconomics	Kane County supports efforts to maintain or improve the overall economic base through the judicious use and enjoyment of federal and state lands. County policy is that economic diversity and long-term stability are beneficial to the welfare of county residents. Any proposed change in land use must evaluate, mitigate, and minimize impacts to customs and culture and the economic stability of the county. The prioritizing of any one multiple-use should only occur after the impacts to other multiple-uses are fully quantified and mitigated. Any proposal to close federal lands to a particular use must be reviewed with the county after public hearings and meetings with county officials. The County will oppose any activities and plans that adversely impact the customs and culture of Kane County.	Scoping Letter GSENM -signed.pdf
Isaly	Ellen	N/A	Component of alternative proposed; socioeconomics	I urge you to choose the most protective management alternative for the monument, recognizing tribal communities and the millions of people who have expressed support for and care about these places, while ensuring healthy national parks and monuments and a vibrant, sustainable tourism economy.	N/A
Cox	Steven	N/A	Component of alternative proposed; socioeconomics	As the former Mayor of Boulder, I am aware of the economic benefit of the monument. Most of our gateway community's economies rely on the attraction of the monument at its restored size. The voices of the Escalante/Boulder Chamber of Commerce need to take priority over those of the County Commissioners and uninformed State legislators. The three County Commissioners are elected "at large" so must cater to the residents of Panguitch, one of the towns least impacted by the monument, to be voted in. If local voices are to be judged as an important factor, the opinions of the County Commissioners should have less weight than those of the business leaders in gateway communities.	Comments on the Management Plan for the Grand Staircase Escalante National Monument.docx
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	Goal 3 Protect eagle and other raptor habitats. Maintain healthy vegetation to support raptor prey base.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	Goal 4 Manage the biological integrity and resiliency of terrestrial and aquatic ecosystems to maintain and/or improve habitat and fish and wildlife populations, with emphasis on climate change resiliency and overall biodiversity.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	Wildlife and Fisheries - Proposed Alternative Components Goal 1 Maintain, protect, enhance, and recover habitats and populations of federally listed threatened, endangered, or candidate animal or fish species, and actively promote recovery to the point that provisions of the ESA are no longer required. Maintain, protect, enhance, and recover habitats of the latest Utah BLM State Directors sensitive animal species list to ensure that BLM-authorized or approved actions are consistent with the conservation needs of the species and do not contribute to the need to list any species under the ESA. [see section 2.4.1 in 2020 RMP] Objectives - Conserve habitat for migratory birds and emphasize management of migratory birds listed on the USFWS's current list of Birds of Conservation Concern and the Partners-in-Flight priority species. [from section 2.3.1 in 2020 RMP] - Consult and coordinate with USFWS on an ongoing basis throughout implementation of this plan for activities potentially affecting threatened and endangered species and their habitats. [from section 2.4.1 in 2020 RMP]	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	SPEC-4 Designate the Seamans Wash ACEC and implement necessary special management prescriptions.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-1: The following measures will be utilized for any activities with the potential to impact pinyon jays: - Survey all areas where trees will be removed or habitat disturbance will occur, with surveys conducted during pinyon jay nesting season (generally February through May). Areas should be surveyed even if the tree removal or disturbance will take place outside the nesting season, as pinyon jays can have very high nest site fidelity and may use the same nesting sites across years. - To establish pinyon jay absence, three surveys should be conducted during the nesting season, with each survey separated by at least two weeks. - If pinyon jay nests are found, the breeding colony should be buffered by a 500 meter no-treatment/disturbance zone as recommended by the Conservation Strategy for the Pinyon Jay led by the U.S. Fish & Wildlife Service. <sup>94</sup> 94 Somershoe, S. G., E. Ammon, J. D. Boone, K. Johnson, M. Darr, C. Witt, and E. Duvuvuei. 2020. Conservation Strategy for the Pinyon Jay (Gymnorhinus cyanocephalus). Partners in Flight Western Working Group and U.S. Fish and Wildlife Service.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-10: Manage habitat to minimize disturbance.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-11: Raptor management will include seasonal and spatial buffers and mitigation to maintain and enhance raptor nesting and foraging habitat while allowing other resource uses.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-12: Agencies will post or otherwise provide educational information to reduce climbing and canyoneering impacts on active raptor nests.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-13: Close areas (amount of time depends on species) near active raptor nests to rock climbers or other activities, generally from January through May.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-14: Conduct surveys and closely monitor raptor populations in this Monument.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-15: To meet the above objectives, the BLM will manage habitats for the recovery or reestablishment of native populations through collaborative planning with local, State and Federal agencies, user groups, and interested organizations. [from FWL-1 in 2000 MMP]	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-16: The BLM will work with the UDWR to meet the requirements of Executive Order 11312 on Invasive Species. [from FWL-2 in 2000 MMP]	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-17: The BLM will continue to work with the UDWR to meet the goals described in adopted species management plans. [from FWL-3 in 2000 MMP]	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-18: The BLM will place a priority on protecting riparian and water resources as they relate to fish and wildlife, and will work cooperatively with the U.S. Forest Service to coordinate maintenance of fisheries and flows. [from FWL-4 in 2000 MMP]	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-19: The BLM will preserve and enhance the integrity of wildlife corridors, migration routes and access to key forage, nesting, and spawning areas by limiting,modifying, or removing adverse impacts from development in the Monument. [from FWL-5 in 2000 MMP]	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-2: The BLM will continue to ensure that authorized actions do not jeopardize the continued existence of any special status animal species or result in the destruction or adverse modification of critical habitats. [from SSA-1 in 2000 MMP]	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-20: All proposed projects will be required to include a site assessment for impacts to fish and wildlife species. Appropriate strategies will be used to avoid sensitive habitat (i.e., construct barriers). Seasonal restrictions on visitor use could be implemented to protect crucial habitat and migration corridors. [from FWL-6 in 2000 MMP]	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-21: Water developments may be constructed for wildlife purposes if consistent with the overall objectives for fish and wildlife and with water development policies. [modified from FWL-7 in 2000 MMP]	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-22: The BLM will continue to coordinate with the UDWR and other organizations to inventory wildlife and to evaluate needs for habitat protection. Inventory and research efforts will be targeted to fill information gaps on habitat needs under climate change conditions. Such research will be coordinated as part of an adaptive management framework. [modified from FWL-8 in 2000 MMP]	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-23: Public education and interpretation will be emphasized to improve visitor understanding of fish and wildlife species. Collaborative partnerships with Tribes, volunteers, and universities will be pursued to monitor and study biological resources consistent with the overall objective of protecting such resources. [from FWL-9 in 2000 MMP]	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-3: Surface disturbing research activities will generally not be allowed in threatened or endangered species habitat. Projects which provide new information and understanding of listed species, their populations, and/or their habitat, may be allowed after approval by the BLM and the review and issuance of permits by the USFWS. [from SSA-2 in 2000 MMP]	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-4: Vegetation restoration methods will not be allowed in areas where special status species roost or nest (unless consultation with USFWS indicates no effect or a beneficial effect to species). [from SSA-5 in 2000 MMP]	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-5: If recreation activities (e.g., hiking, camping, biking, OHV use) are determined to impact known Mexican spotted owl nest sites, allocations, group size restrictions, closures, or other measures will be implemented to reduce or eliminate disturbance. [see SSA-18 in 2000 MMP]	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-6: In areas with known Mexican spotted owl nest sites, climbing closures will be established to assure that disturbance of nesting activities does not occur. [see SSA-20 in 2000 MMP]	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-7: For all grazing allotments that include Mexican spotted owl designated critical habitat, implement specific grazing management provisions (e.g., utilization levels) that are consistent with healthy foraging habitat for spotted owls.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-8: Ground-disturbing actions that adversely impact fish and wildlife species and habitats will be avoided.	GESNM_Scoping_Comments.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; special status species and habitat	WILD-9: Maintain, restore, and/or improve critical habitat requirements for native fish and amphibian and aquatic species, including restoration and enhancement of backwater, side channel, and floodplain habitats.	Appendix B - RNA Proposals.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Spotts	Richard	N/A	Component of alternative proposed; special status species and habitat	The NOI references ACEC nominations. This is ironic. Over a decade ago, when the BLM RMP revision planning was done for the Grand Canyon Parashant National Monitoring, BLM decided that ACECs were not necessary or relevant in this monument because the Antiquities Act and Proclamation provided stronger protection. At that time, it was argued that ACECs were compatible with object protection and would provide a parallel level of protection. ACECs could also protect sensitive resources that were not identified as monument objects. But BLM managers rejected those arguments. This issue is one of many examples of inconsistent BLM policies that may undermine effective monument protection. I strongly believe that ACEC designations ARE appropriate in the GSENM and other BLM national monuments. Unfortunately, BLM tends to reject many appropriate ACEC designations. This bias goes against the clear FLPMA intent that identifying and designating ACECs is a priority. BLM should be truly open and receptive to GSENM ACEC nominations. When designations occur, BLM should properly enforce and implement them. I am aware of situations where BLM has failed to defend its ACECs through excessive cattle grazing, road building, and water diversions. BLM managers must be held accountable for any decisions that go against and may undercut monument or ACEC protections.	N/A
Falcon	Jennifer	N/A	Component of alternative proposed; special status species and habitat	Native species should be prioritized. Any invasive animals which are causing a problem should be dealt with humanely and without spreading deadly chemicals.	N/A
Not Provided	Utah resident	N/A	Component of alternative proposed; special status species and habitat	Native pollinators are likewise essential and should be fully protected.	N/A
Not Provided	Not Provided	National Wildlife Federation and Utah Wildlife Federation	Component of alternative proposed; special status species and habitat	The BLM should include protective measures for big game migration corridors in the Management Plan. As Proclamation 10286 acknowledges, the Monument and surrounding areas provides important habitat for big game, including important migration corridors for mule deer and bighorn sheep. Studies conducted by the Utah Wildlife Migration Initiative, a program of the Utah Division of Wildlife Resources, indicate that there are two mule deer herds that migrate seasonally into and across the Monument-the Paunsaugunt and the Kaiparowits. The Paunsaugunt mule deer herd, which Proclamation 10286 identifies, is made up of around 5,200 individuals who leave their summer range in the Paunsaugunt Plateau in October, traveling up to 78 miles across the Monument and to the Buckskin Mountains along the Utah-Arizona border. Here, they share winter range with the Kaibab Plateau mule deer herd. In April, the herd makes its way back across the Monument, returning to summer range. The State of Utah, in recognition of the importance of the Paunsaugunt herd to the state, identified it as one of its top priorities in its Utah Action Plan, a document prepared in response to Department of Interior Secretarial Order 3362. Utah and Arizona have also made significant investments in infrastructure aimed at reducing wildlife-vehicle collisions in the area. The Utah Wildlife Migration Initiative has also tracked movement of the Kaiparowits mule deer herd and is studying the movement and survival of the Kaiparowits Bighorn Sheep in and near the Monument. The study and understanding of migration corridors are ongoing, with researchers identifying additional routes and gaining a better appreciation of the importance to wildlife of movement across a landscape. We are also learning how activity, development and disturbance affect the behavior of migrating big game.2 2 For example, see Hall Sawyer, Nicole M. Korfanta, Ryan M. Nielson, Kevin L. Monteith & Dale Strickland, Mule deer and energy development-Long-term trends of habituation and abundance, GLOBAL CHANGE BIOLOGY (Apr. 4, 2017) (see also studies cited within this article); Hall Sawyer, Nicole M. Korfanta, Matthew J. Kauffman, Benjamin S. Robb, Andrew C. Telander, Todd Mattson, Trade-offs between utility-scale solar development and ungulates on western rangelands, FRONTIERS IN ECOLOGY AND THE ENVIRONMENT (Apr. 21, 2022). We urge the BLM to include in its Management Plan measures to protect these and other corridors that may be identified in the future. Such measures could include those similar to objectives identified in the 2000 Management Plan (especially FW-5 and FW-6), including reducing activity and disturbance during seasonal migrations where appropriate and limiting development and uses that may negatively impact the corridor or movement.	GSE Plan Scoping - NWF UWF Comment Letter September 2022.pdf
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Component of alternative proposed; special status species and habitat	The Navajo Nation supports the science mission and the establishment of Research Natural Areas (NRAs) of all action alternatives but would like to emphasize that these projects must not preclude traditional uses and collecting activities.	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; special status species and habitat	Efforts to continue habitat maintenance on previous habitat projects should be identified in the RMP, especially to improve wildlife habitat. The DWR also encourages future habitat restoration actions to further improve wildlife habitat.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; special status species and habitat	The DWR would support an effort from the BLM to incorporate language in the RMP that protects high-quality wildlife habitats and migration corridors from potential detrimental uses.	GSENM RMP Scoping Comments 27SEPT2022.pdf
King	Catherine	Utah Native Plant Society	Component of alternative proposed; special status species and habitat	Managers need to better understand the effects of climate change, drought, and livestock grazing on these rare plants and their associated habitats. As the climate warms and dries, the habitat of rare plant species may become unsuitable and populations may decline. Managers must identify and carefully protect alternative habitat locations. For example, protecting riparian corridors that span elevation ranges may anticipate future habitat needs for riparian-dependent species.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Component of alternative proposed; special status species and habitat	On the adjacent Wiggle Rim Pasture of the Cottonwood Allotment there have been a number of rare plant observations. Reduced, or no, livestock grazing on the Wiggle Rim Pasture could greatly benefit Tropic goldeneye (Heliomeris soliceps, synonym Viguiera soliceps), Higgins' spring-parsley (Cymopterus acaulis var. higginsii), Kodachrome peppergrass (Lepidium montana var. stellae) and Paria spurge (Euphorbia nephradenia).	UNPS on GSENM 2022 (1).docx
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; other	The agency should adequately consider alternatives to wholesale motorized closures that would mitigate fish and wildlife concerns should be given a hard look.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; other	The agency should adequately consider public safety by forcing camping, picnicking, and other motorized access activities in close proximity to well-traveled roads.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; other	The agency should adequately consider public safety by squeezing motorized activities into limited miles of roads and trails.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Component of alternative proposed; other	The agency should adequately consider that; a.Education of all recreationists is a reasonable alternative and the most equitable alternative. b.Education as an alternative to motorized closures should be exercised and increased. c.Education can be used with all ages and is especially effective with our youth.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Berry	Scott	N/A	Component of alternative proposed; other	C.GSENM includes several areas which satisfy this definition and which should be analyzed and studied for designation as ACES's. D.Those areas, which contain historic, cultural, scenic values, and which experience a the majority of visitation in the Escalante watershed, include, but are not limited to; a. The riparian corridor of the Escalante River included within the planning area, including GSENM and GCNRA, from the river channel to a boundary line 2 miles distant from the canyon rims. b. The principal corridors of tributaries to the Escalante River, from canyon bottom to a point 1 mile distant from the canyon rims, within the planning area, including, but not limited to; i.Mamie Creek, Death Hollow, Sand Creek and Calf Creek; ii.Boulder Creek, Deer Creek, Steep Creek; iii.The Gulch, Horse Canyon, Little Death Hollow; iv.Silver Falls Creek, the Moody Canyons, Stevens Canyon; v.Coyote Gulch, Willow Gulch, Davis Gulch; vi.Scorpion Gulch, Twenty-Five Mile Gulch, Harris Wash c. Other areas of the planning area qualifying for ACEC designation; i.The watershed of the Collett Canyon complex. ii.The Straight Cliffs and Fifty Mile Bench, from the Hole in the Rock Rd. to a line 1 mile distant from the face of the Straights Cliffs. iii.Navajo Point, Little Escalante Canyon; iv.Cottonwood Canyon, from the Cottonwood Canyon Road to lines one mile distant from the rims of the Canyon. v.Hackberry Canyon; Round Valley Draw; Bull Valley Gorge; Sheep Creek; Willis Creek. vi.The Paria River Canyon complex, including Deer Point; No Man's Mesa; Mollies Nipple; vii.The faces of the White Cliffs and Vermillion Cliffs viii.The "V" area, including the feature known as the Cosmic Vortex, north of Harris Wash	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Baruey	Wade	N/A	Component of alternative proposed; other	Keep open for fire wood.	N/A
Baruey	Wade	N/A	Component of alternative proposed; other	Keep open for minerals.	N/A
waggoner	kristina	N/A	Component of alternative proposed; other	BLM should provide their own law enforcement and search and rescue teams. They should do this so they can have trained personal in the field assisting visitors in need. Currently search and rescue responsibilities fall on a volunteer county SAR's team. They do not have the time or training to assist visitor on the national monument.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Component of alternative proposed; other	We also strongly support the withdrawal of GSENM lands from industrial/commercial extractive processes (oil, gas, mineral, etc.). Please keep in mind that we wish to differentiate the traditional use of minerals and other materials from those done on a larger industrial scale and would like to ensure that Navajo traditionalists are not restricted from the collection of minerals (hematite, salt, clays, etc.) and other traditionally significant resources.	N/A
Campbell	Todd	University of Tampa	Component of alternative proposed; other	The Grand Staircase will then no longer be known for the clear air and dark skies. I believe the best possible solution for the Dark Night Skies and Natural Soundscapes is Alternative E, which focuses on the maximization of maintenance of natural processes, by limiting and/or discontinuing discretionary use. This alternative is necessary because Grand Staircase is one of the darkest, rural, and unmapped National Parks in the world, with abundant resources for science and immaculate air quality. Grazing, mining, climate change, recreation (such as hunting), and light pollution will make this area no longer one of the darkest paces in the United States, and the area will become polluted by noise and light. If noise and light pollution occurs because of mining, this area would no longer be known for the abundant resources, air quality, and the natural darkness of the Grand Staircase. Luginbuhl, L., Walker, C., & Wainscoat, R. (2009). Nps.gov homepage (U.S. National Park Service). National Parks Service. Retrieved September 15, 2022, from <a href="https://www.nps.gov/index.htm">https://www.nps.gov/index.htm</a>	N/A
Walker	Joro	Western Resource Advocates (WRA)	Component of alternative proposed; other	Utah Water Quality Standards and conservation science further confirm that to safeguard Monument water resource values it is necessary to ensure that upstream and watershed-wide conditions and activities are not degrading water quality and otherwise interfering with the protection of riparian zones, wetlands, water quality and water quality. These water resource values also must also promote and fully support Monument wildlife and plants. Therefore, it is legally incumbent on BLM to assess the condition of upland and upstream water resource values and to derive and implement an alternative that ensures that upstream and watershed-wide management activities safeguard and do not harm Monument water resource values.	wra gsenm rmp scoping 9 18 2022.pdf
Painter	Michael J.	Californians for Western Wilderness	Component of alternative proposed; vegetation	We have been troubled over the years by proposals to remove piñon and juniper woodlands, some of which are old-growth, along with sagebrush. This is especially a problem when the method of removal involves the use of heavy equipment such as tractors dragging heavy chains. Not only does this change the habitat, it also damages the biological crust that forms the basis of new soils and helps to control erosion and dust. Biological crusts are increasingly being investigated in connection with carbon sequestration and global climate change.	N/A
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	Goal 1 Maintain or increase populations of rare plants in the Monument. Objectives - Conduct surveys for rare plants based on models that predict the possible locations of each species. - Monitor the status of rare plants over time and determine if any rare plants are declining and seek to identify and remedy the causes if possible. - Collaborate with researchers inside and outside federal agencies to conduct surveys and monitoring of rare plants.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	Goal 2 Consult with Tribes about management of culturally relevant plants, and manage vegetation to support medicinal plants and other culturally important vegetative resources. Objectives - Compile a list, in consultation with Tribes, of culturally important plants that should be prioritized for protection or recovery during management activities. - Incorporate tribal guidance for management. - Work with local communities and Tribes to advertise contracting and employment opportunities related to vegetative management. - Partner with nonprofits and other groups to complete vegetative management projects where feasible.	GESNM_Scoping_Comments.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	Goal 3 Vegetation treatments will prioritize the restoration of native ecosystem processes. Objectives - Create a formal decision-making apparatus for determining when livestock are allowed to resume grazing in a vegetation restoration project.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	Goal 4 Vegetation treatments will be managed for long-term resistance and resilience. Objectives - In keeping with the overall vegetation objectives and Presidential EO 11312, native plants will be used for all projects in the Monument. - Non-native plants may not be used in routine vegetation management since their benefits have yet to be independently verified as better than the use of native species since it may hinder the restoration of native vegetation communities. - Vegetation treatments will be managed conservatively post-treatment so that retreatment will not be necessary.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	Goal 5 All vegetation treatments will include an estimate of the amount of carbon release caused by the action.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	Goal 1 The BLM will place a priority on control of noxious and invasive non-native plants to achieve overall vegetation objectives. Objectives - Prioritize species on variables such as extent of invasion, aggressiveness of the species (i.e., cheatgrass), sensitivity of the area being invaded, and accessibility. - Conduct research on exotic species locations and control measures. Identify vectors of noxious and non-native invasive species spread (e.g., recreation, vehicle traffic, livestock grazing) to reduce introduction and expansion of exotic plant populations. - Research and use weed control methods that allow native species a competitive advantage. - Use targeted early detection, rapid response, and native species restoration to pre-empt or contain non-native plants. Vulnerable and important habitats, such as those with high levels of native species richness, rare species, rare and important vegetation types with fertile soils, and riparian areas and wetlands, will be prioritized.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	NI-2: Identify native plant species to target for seed collection to create a reserve of GSENM-adapted seeds and genetic tissues for restoration and research.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	NI-3: Ensure that all projects in the Monument that include ground disturbance contain restoration protocols to minimize re-colonization of treated areas by noxious weed species. Monitoring in these areas, as with all monitoring prescribed above, should be part of adaptive management, with results feeding into and informing future exotic control treatments.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	NI-4: Work with the Escalante River Watershed Partnership and GSEP to support the Russian olive and tamarisk removal program that the Partnership and GSEP have conducted for the past decade. Develop a plan for integrating this work into ongoing BLM-managed invasive species treatment, maintenance, and monitoring.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	NI-5: Develop a noxious weed woody plant control program for the Paria River to remove Russian olive and tamarisk.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-10: Work with Tribes, non-profits, and volunteer groups to remove invasive species and transplant native vegetation.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-11: Create a plan to remove tamarisk and Russian olive and transplant native willows.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-12: Locate and protect reference communities for as many vegetation types and successional phases as possible. If undisturbed reference areas cannot be located, large exclosures should be installed in the best examples of those systems. Where local reference areas are preferable but simply do not exist, designate local areas to attain future reference area status (i.e., at least ten years of non-use by livestock). In the interim, use a more distant reference site that has not been grazed for at least ten years.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-13: Where biological soil crust is abundant within a vegetation project area, locate, map, and avoid crust when the project commences.	GESNM_Scoping_Comments.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-14: No mechanical removal of pinyon-juniper woodland is allowed. Methods such as chaining, harrowing, and mastication are prohibited. Manual removal could be done such as cutting with handheld chainsaws. [see RM-2 in 2000 MMP]	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-15: Individual removal of a tree in order to address a safety issue is allowed using hand tools.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-17: Engage with the Tribes regarding Traditional Knowledge about vegetation communities, vegetation restoration techniques, and land management. Formalize a process for adopting parts of GSENM as wholly Indigenous-managed places to incorporate additional land management and restoration perspectives, if Tribes so desire.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-18: Any vegetation restoration projects will take a holistic approach to managing vegetation. In particular, the past influence of grazing on vegetation dynamics will be analyzed, and future changes to grazing management will be considered to effectively accomplish vegetation restoration goals.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-19: Vegetation restoration project areas will be rested from cattle grazing for at least two consecutive non-drought years. Plots will be established to collect data on recovery. Grazing will not resume until ground cover of native vegetation is 80% of that expected for the site.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-20: Old-growth trees (150+ years old) will not be the target of treatment projects.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-21: All vegetation restoration projects will use seed from native species. Collaborate with regional Seeds of Success teams and the BLM Colorado Plateau Native Plant Program to collect seed for restoration projects.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-22: Non-native plants will not be used to increase forage for livestock and wildlife.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-23: A formal, transparent, public decision apparatus will be created for determining when vegetation treatments show enough success that livestock are allowed to resume grazing.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-3: Write a conservation strategy for each rare species.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-5: Provide for the management, protection, and access to vegetation types important to Tribes.	Appendix B - RNA Proposals.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-6: The entire Monument or certain localities may be closed to seed gathering as necessary to provide for sustainable annual seed production of native plants. An exception to this will be made to allow for private seed gathering and plant collection for Tribal members for traditional, medicinal, and ceremonial purposes.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-7: Utilize passive restoration as a tool for restoration where a seed bank exists. This technique relies on removing the disruptive anthropogenic agents preventing restoration of ecosystem health, particularly soil disrupting activities, and allowing time to restore soils, vegetation, and hydrologic function.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	VEG-9: Conduct follow-up studies post treatment, using cattle free exclosures, to determine treatment effects in grazed vs. ungrazed portions of the treatment area and to determine whether treatments have achieved management objectives and to provide baseline data to overall change.	Appendix A - Figures & Tables.pdf
King	Robert	N/A	Component of alternative proposed; vegetation	Protect old-growth forests, in particular, the pinyon and juniper trees.	N/A
Shaffer	Joseph	N/A	Component of alternative proposed; vegetation	Prohibit chaining in the national monument. Only native species should be planted.	N/A
Woodbury	Deborah	N/A	Component of alternative proposed; vegetation	Stop cutting trees to favor cattle grazing.	N/A
Worthy	Crista	N/A	Component of alternative proposed; vegetation	NO MORE CHAINING OF JUNIPERS.	N/A
Schell	Ronald	N/A	Component of alternative proposed; vegetation	Please do not allow mechanical treatments of native Pinyon-Juniper forests to facilitate grazing or any other destructive use.	N/A
King	Catherine	Utah Native Plant Society	Component of alternative proposed; vegetation	Do not conduct vegetation treatments unless thry foster the restoration of native ecosystem processes.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Component of alternative proposed; vegetation	Do not seed species that are not native to Utah.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Component of alternative proposed; vegetation	Write a conservation strategy for each rare species.	UNPS on GSENM 2022 (1).docx
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	FIRE-7: Projects using non-native seed will include a research component designed to evaluate species in the context of soil stabilization, water retention, and rate of recovery of native species. An annual report will be prepared for the Monument Advisory Council on project success.	GESNM_Scoping_Comments.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	HYDRO-14: Continue to reduce tamarisk and Russian olive where possible. Work with tribal conservation crews (such as the Ancestral Lands Conservation Corps) on these efforts.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; vegetation	HYDRO-15: The harvest of cottonwood, willow, reed, cattails, and other riparian species will be allowed for ceremonial uses through a permit system that has been developed incoordination with Tribes. Restrictions on this harvest will be implemented as necessary to achieve or maintain properly functioning conditions.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; soils	Goal 2 Increase and improve understanding of biological soil crust management. Objectives - Facilitate basic research on biological soil crusts as well as their preservation and restoration to improve management and protection of these resources. - Use the best available science in NEPA analysis of the effects of proposed management activities.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; soils	Soils and Biological Soil Crusts - Proposed Alternative Components Goal I Prevent damage to and degradation of soil resources and ensure that soil health is maintained or improved. Objectives - Ensure soils exhibit infiltration, permeability, and erosion rates appropriate for the soil type, climate, and landform. Avoid activities that impact function, health, and distribution of soil resources. - Maintain, improve, and restore areas of biological soil crust appropriate for the soil type, climate, and landform.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; soils	SOIL-1: Protect soils from ground-disturbing management activities. BLM and USGS research has identified practices that are useful in rehabilitating biological soil crust and minimizing impacts from Agency activities, including: 47,48 47 Belnap, J., R Rosentreter, S. Leonard, J. Hilty Kaltenecker, J. Williams, and D. Eldridge. 2001. Biological Soil Crusts: Ecology and Management. BLM Technical Reference 1730-2. 48 Rosentretter, R, M. Bowker, and J. Belnap. 2007. A field guide to biological soil crusts and western U.S. drylands. U.S. Government Printing Office, Denver, CO. - Reducing unnaturally frequent and intense fires, such as those resulting from annual grass invasions (i.e., on Buckskin Mountain). 49 - Concentrating recreational use by hikers and OHVs to reduce trampling and prevent disturbance. - Reducing grazing impacts to biological soil crust. Grazing strategies that minimize the frequency of surface disturbance during dry seasons and maximize periods between disturbances will reduce impacts to biological soil. For recovering areas, rest from grazing (conservation use) is recommended. When fully recovered light grazing in the early- to mid-wet season for short periods of time is recommended. -Collecting data on the distribution of biological soil crusts, particularly rare species and high species diversity, to define habitat characteristics and identify threats. Include a moss and lichen species component to plant monitoring and inventory projects. Collect specimens of biological soil crust to identify species and map distribution on the Monument.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; soils	SOIL-2: Identify biological soil crust condition throughout the Monument to locate areas that are impaired. Use available research on biological soil crust potential to identify areas of unimpaired conditions.50	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; soils	SOIL-3: When planning road and trail construction, areas with high percentage cover of biological soil crust or high biodiversity conservation value will be avoided. Enforcement of off-road vehicle regulations will be prioritized in these areas.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; soils	SOIL-4: Because several soil crust species and some vascular plant species are rare gypsum endemics, and gypsum soils cover very little area, these soils will be prioritized for increased protection.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; soils	SOIL-5: The Monument will not conduct soil surface disturbing projects or allow grazing in habitats of rare biological soil crust species, where biological soil crust diversity is high, or where removal of biological soil crust will degrade soil, hydrology, or biology ecosystem functions.	Appendix D - Alternative Components.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; soils	SOIL-6: Determine the relationship between management actions, such as vegetation treatments and grazing, and changes in soil erosion, biological soil crust structure and function, and subsurface biotic communities post-restoration.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; soils	SOIL-7: Conduct or facilitate basic research on biological soil crust (types, distribution, etc.) in the Monument.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; soils	SOIL-8: Encourage research on restoration of soils and biocrusts to mitigate and reverse erosion, increase soil stability, and facilitate plant re-establishment.	Appendix C - ACECs.pdf
Not Provided	Grateful for the GSENM	N/A	Component of alternative proposed; soils	Cattle grazing should be eliminated and vehicles and hikers should be limited to using designated routes and trails. Allowing these crusts to return will provide many benefits for the protection of other GSENM objects and values.	N/A
Not Provided	Utah resident	N/A	Component of alternative proposed; soils	Cryptobiotic soil crusts are critically important and should be protected or allowed to return.	N/A
Not Provided	Grateful for the GSENM	N/A	Component of alternative proposed; soils	This new planning process should include a management priority to protect and restore these crusts.	N/A
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; soils	VEG-8: Where biological soil crust is abundant within a vegetation project area, locate, map, and avoid crust when the project commences. Where crust destruction is unavoidable, it should be harvested before treatment and replaced as part of the post-treatment rehabilitation.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	Goal 1 Manage and protect cultural resources in collaboration with Tribes. Objectives - Define "cultural resources" according to perspectives of Tribes, which include ancestral sites, plants, animals, birds, and minerals. - Ensure Tribes are given the opportunity to manage cultural resources significant to their clan and family histories, traditions, and identities to the extent allowed by law. - Better understand and manage the cultural resources within the Monument, according to the perspectives and values of Tribes. - Provide opportunities and resources for the Tribes to direct and manage the identification and ongoing stewardship of these resources. - Identify and evaluate cultural resources, especially within areas where visitation is anticipated to increase, ensuring meaningful consultation with Tribes throughout this process. - In collaboration with the Cultural Preservation Offices, or other individuals or entities designated by the Tribes to address cultural issues, identify and evaluate potential traditional cultural properties (TCPs), sacred sites, cultural landscapes, traditionally significant vegetation and forest products, viewsheds, and culturally significant minerals.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	Goal 2 Minimize damage to cultural resources from visitor use. Objectives - Prevent and reduce future damage to cultural resources in light of current and projected increased visitation.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	Goal 3 Ensure tribal access and use for traditional and cultural purposes. Objectives - Support each Tribe's ability to access culturally significant sites, places, or natural resources for ceremonies and activities important to tribal culture and traditions.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	Goal 4 Address data gaps about cultural resources within the Monument. Objectives -Identify and evaluate cultural resources as defined by Tribes, especially within areas of increased visitation and visibility. - Reinforce the BLM's understanding of the deep tribal connections to the land through field visits and ethnographies.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-1: Engage with Tribes about collection of any archaeological objects and appropriateness of their use in museum exhibits.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-10: Develop a schedule in collaboration with Tribes to allow sites to "rest." Resting periods usually occur in the winter months, and visitation should be restricted during these times.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-11: Facilitate Native use of traditional cultural properties, sacred sites, cultural landscapes, and traditionally significant vegetation, forest products, and minerals. In coordination with Tribes, implement actions to minimize potential conflicts with traditional activities.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-12: Keep sensitive cultural information confidential and safeguard it from release to the extent allowed by law.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-13: As directed by the Tribes, determine if/how to address current or future impacts to cultural sites and whether to install protective measures (e.g., fences, stanchions, and/or surveillance equipment).	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-14: Manage cultural resources in collaboration with the Tribes for present and future generations in ways consistent with traditional knowledge.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-15: Manage natural resources important to the Tribes of the GSENM for cultural uses.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-16: Establish and implement protective measures for cultural resources that maintain viewsheds, as well as the auditory, visual, and aesthetic settings of the resources. Protection measures will be developed in consultation with Tribes.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-17: Conduct Class III cultural resource inventories in a manner that complies with Section 110 of the National Historic Preservation Act and Section 14 of the Archaeological Resources Protection Act.	Appendix C - ACECs.pdf



Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-18: All research, inventories, and monitoring of archaeological resources will be conducted in accordance with applicable laws, regulations, and policy, and will employ tribal members and incorporate tribal policies and protocols to the extent legally permissible.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-2: Proactively implement a wildland fuels (wood, brush, etc.) management plan based on potential hazards around archaeological and cultural sites that are susceptible to destruction by fire from prescribed burns or wildfire. If areas are cleared, Tribes should be informed about plant species at sites that are available for traditional collection, and if wood is cut then it should be offered to Tribes.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-3: Educate recreational users as directed by the Tribes on how to visit respectfully, as well as methods to avoid and reduce impacts to sensitive cultural resources.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-4: Provide Tribes the opportunity to coordinate on the development of an activity-level cultural resources management plan.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-5: Establish and implement protective measures for sites, structures, objects, and traditional use areas that are important to Tribes for historical and cultural reasons, including measures to maintain viewsheds, as well as the auditory, visual, and aesthetic settings of the resources. Protection measures for undisturbed cultural resources and their natural settings will be developed in consultation with Tribes.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-6: Prohibit domestic pets and pack animals in archaeological sites.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-7: Consult with the Tribes on the management of cattle in archaeological sites.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-8: Prohibit campfires in and around archaeological sites. Exceptions may be made for Native American traditional and ceremonial purposes.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; cultural / tribal concerns	CR-9: Close cultural sites to visitation when they are determined to be at risk or pose visitor safety hazards, or for maintenance, or when in use by tribal members for traditional purposes to the extent permitted by law.	Appendix C - ACECs.pdf
Sjogren	Morgan	N/A	Component of alternative proposed; cultural / tribal concerns	A complete cultural resource inventory of GSENM is necessary, because only 5-7% of the monument has been surveyed. The history of regional archaeology is the topic of several articles I have written and my next book. Through this research it is clear to me that GSENM is starkly under-surveyed compared to other comparable areas of cultural resources in the greater Glen Canyon region. A plan to fully inventory the monument, with the input of the tribes, needs to be included in the RMP. Ethnographies of Tribes affiliated with GSENM are needed. This may or may not be made public based on each Tribe's discretion. Educational information about each Tribe and their connection to this landscape needs to be made available to the public and incorporated into educational planning. My hiking and writing have connected me with several of the Tribes, and their individual members, affiliated with GSENM. Their connection to the land is very obscured when the public seeks information or visits the monument. These Tribes still maintain important connections to the land and this needs to be a prominent part of GSENM management planning for education, signage, and Tribal input. Public education to Visit with respect needs to be heavily emphasized in the RMP. Tribes need to lead this. Tribes need to be given the ability to access culturally significant sites, places, or natural resources for ceremonies and activities important to tribal culture and traditions.	40 Mile Gulch _ 2 May 2020.pdf
Sutter	Eileen	N/A	Component of alternative proposed; cultural / tribal concerns	Mechanical treatment of vegetation, including chaining, mastication, harrowing, or any other mechanized vegetation removal should never be allowed in GSENM. All these forms of treatment are too aggressive with high potential to damage cultural resources.	Comments for 2022729 GSENM RMP FR Notice of Intenet 2022.docx
Anderson-Schwartz	Pat	N/A	Component of alternative proposed; cultural / tribal concerns	Protect and restore cultural resources and traditional uses. Consider tribal activity in resource management and planning decisions to allow inclusion of the Native American perspective concerning land use.	BLM Comments.docx
Not Provided	Not Provided	National Wildlife Federation and Utah Wildlife Federation	Component of alternative proposed; cultural / tribal concerns	Ensure the Management Plan addresses any increased visitation and use of the Monument in a way that protects objects of historic, natural and scientific interest, including objects of cultural and spiritual importance to Indigenous communities. The Monument, like many of our Nation's public lands, has seen an increase in visitation and use in recent decades, especially during the COVID-19 pandemic. While we strongly support broad access to our public lands and resources, such an increase has the potential to negatively impact wilderness values, visitor experiences, natural and cultural resources, and wildlife if not properly addressed. Managing visitation and use demands agency time and resources, but we urge the agency to address the issue in its Management Plan. The BLM should consider using Management Zones, as it did in its 2000 management plan, to emphasize types of uses in different parts of the Monument. These Management Zones would allow for management decisions, such as designated routes for travel, the placement of future developed recreation sites, or management of invasive species, to be based on the criteria for that zone and to set overarching goals for visitor experiences, needs and expectations. Management Zones would also allow the agency to proactively identify and protect less visited, more sensitive areas on the Monument, including important wildlife habitat. Regardless of the approach the BLM takes regarding visitation and recreation, the BLM should engage with Indigenous communities in identifying, preventing and mitigating potential risks of increased visitation to cultural resources and uses.	GSE Plan Scoping - NWF UWF Comment Letter September 2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; cultural / tribal concerns	The BLM's land management plan should not obstruct the very people who have long preserved, protected, and loved this land from doing the activities that are compatible with and beneficial to it, AND that have kept and preserved the land and its resident archaeological and cultural features as they are today.	GSENM RMP Scoping Comments 27SEPT2022.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; forestry and woodland products	FOR-1: No areas are designated as open to woodland product harvest for the entirety of the life of the management plan. Cutting areas may be designated as part of vegetation restoration projects.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; forestry and woodland products	FOR-10: Exclude floodplains and riparian and aquatic areas from woodland product use except for Native American ceremonial purposes as determined on a site-specific basis.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; forestry and woodland products	FOR-11: Provide employment opportunities for local and tribal community members.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; forestry and woodland products	FOR-2: Non-commercial fuelwood harvesting, post cutting, and Christmas tree cutting is allowed by permit only within designated areas. Cutting is not allowed in Wilderness Study Areas or lands with wilderness characteristics. No commercial post cutting or Christmas tree cutting is allowed. [see FP-1 in 2000 MMP]	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; forestry and woodland products	FOR-3: Prohibit the removal of ponderosa pine for Christmas trees. [FOR-2 in 2020 RMP]	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; forestry and woodland products	FOR-4: All cutting areas will be limited to chainsaw and manual saw cutting only, will be designated under a permit system, and will have maps provided to assure compliance. [see FP-2 in 2000 MMP]	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; forestry and woodland products	FOR-5: Cutting of old-growth trees (over 150 years) is not permitted in cutting areas. In any cutting areas where present, flagging will be used to prevent cutting of old-growth trees.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; forestry and woodland products	FOR-6: Cutting areas will be surveyed for nesting birds at the appropriate time period before cutting is permitted. If cutting extends across years, surveys will be conducted each year before cutting is allowed.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; forestry and woodland products	FOR-7: Motorized travel is limited to designated routes in cutting areas; cross-country travel is not permitted.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; forestry and woodland products	FOR-8: No commercial timber harvesting is authorized within the Monument. [FP-4 in 2000 MMP].	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; forestry and woodland products	FOR-9: Cottonwood and willow harvest will be allowed by tribal members for ceremonial uses by permit.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; fire and fuels	Wildfire and Fuels Management - Proposed Alternative Components Goal 1 Allow fire to play its historic role in the ecosystem, where appropriate. [see FIRE-1 in 2000 MMP]	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; fire and fuels	FIRE-1: For any naturally-caused ignition, consider allowing the fire to burn if it would contribute to natural ecological processes and not threaten the integrity of Monument objects or public safety...	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; fire and fuels	FIRE-2: Permit the use of prescribed fire in a manner that mimics historical fire regimes where it would contribute to natural ecological processes and not threaten the integrity of Monument objects.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; fire and fuels	FIRE-3: A designated fire resource advisor familiar with WSA issues will be consulted on all fires within the Monument that involve WSAs. [from FIRE-4 in 2000 MMP]	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; fire and fuels	FIRE-4: All fuels management and emergency stabilization and restoration projects outside the Wildland-Urban Interface (WUI) will be aimed at restoring ecological function based on the best available science while also making the landscape resilient in the face of climate change.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; fire and fuels	FIRE-5: Seeding as part of all fuels management projects will only use native seeds.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; fire and fuels	FIRE-6: Seeding as part of emergency stabilization and restoration projects will prioritize the use of native seeds. Non-native species that are either sterile or ephemeral and expected to disappear from the vegetation community within three years of seed establishment may be used where native seed use is not possible. Any areas seeded with ephemeral non-native species will be monitored three years following seed establishment. Any ephemeral non-native species found to persist longer than three years will not be utilized in future projects.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; fire and fuels	FIRE-8: Reseeding or surface disturbing restoration after fires will not be allowed in areas with special status plant species. Natural diversity and vegetation structure will provide adequate regeneration. Management ignited fires will also not be allowed in these areas unless consultation with the USFWS indicates that fire is necessary for the protection and/or recovery of listed species. [from SSP-10 in 2000 MMP]	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	Goal 2 Ensure that surface water ecosystems, including springs, streams and wetlands, are functioning and supporting the native flora and fauna of the region. Objectives - Assess the condition of surface water ecosystems on a regular basis. - Facilitate recovery of degraded springs, riparian areas and wetlands through fencing or other management actions. - Maintain springs, riparian areas and wetlands that are in good condition through fencing or other management actions.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	Goal 3 "The overall objective with respect to riparian resources within the Monument is to manage riparian areas so as to maintain or restore them to properly functioning conditions and to ensure that stream channel morphology and functions are appropriate to the local soil type, climate, and landform" (2000 MMP). Objectives - Assess the condition of all springs on the Monument at least every five years, and for any springs in areas where NEPA is being done.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	Goal 4 Manage spring health for cultural significance in addition to ecological significance. Objectives - Conduct spring restoration or revitalization for at least one spring per year. -Allow use of springs by Tribes for cultural and religious purposes.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	Goal 5 Maintain good water quality or remedy conditions that are creating impaired water quality. Objectives - Conduct assessments to identify places where water quality is impaired.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	Goal 6 Ensure that uses of water rights are not degrading Monument objects. Objectives - Study the impacts of water uses on Monument objects including springs, riparian ecosystems and streams.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	HYDRO-1: Key riparian areas in active grazing allotments will be assessed using PFC98 by a range conservation specialist at least every two years and by an interdisciplinary team at least every 5 years. (adapted from RIPA-2 in 2000 MMP)	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	HYDRO-10: No new surface-disturbing activity will be allowed within active floodplains or within 100 meters of springs and perennial and intermittent streams unless it does not impair riparian function or will benefit soil and water resources.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	HYDRO-11: Create a spring-revitalization program in collaboration with Tribes.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	HYDRO-12: Limit recreational use where the riparian area is being damaged. Prohibit use of All Terrain Vehicles (ATV) and Off Highway Vehicles (OHV) in riparian areas.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	HYDRO-13: No camping allowed within 200 feet of springs to allow wildlife access to water.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	HYDRO-16: Avoid or limit surface disturbance in drinking source water protection zones.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	HYDRO-17: Review the current herbicide plan in coordination with the Tribes to protect water quality.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	HYDRO-2: Monitoring of riparian resource conditions will be established to determine when actions should be taken to ensure movement towards proper functioning condition on all riparian stream segments in the Monument. (from RIPA-3 in 2000 MMP)	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	HYDRO-3: Vegetation restoration methods will not be allowed in riparian areas, unless needed for removal of noxious weed species or restoration of disturbed sites. (from RIPA-5 in 2000 MMP)	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	HYDRO-4: No new water developments will be authorized in hanging garden areas. Maintenance activities will be allowed if these resources are not affected. (from RHG-2 in 2000 MMP)	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	HYDRO-5: Surface disturbing research will not be allowed in hanging garden areas. (from RHG-3 in 2000 MMP)	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	HYDRO-7: Protect springs that have been degraded, by utilizing the BLM's categorical exclusion for "construction of small protective enclosures, including those to protect reservoirs and springs and those to protect small study areas." DOI Manual 516, 11.9(K)(9)	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	HYDRO-8: No new wells will be drilled in the Monument. Do not authorize land uses for water withdrawals that could negatively affect groundwater for seeps and springs to the extent permissible by law.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; water resources	HYDRO-9: Ensure riparian areas are meeting objectives of rangeland health, and if they are not, determine through standards assessment and monitoring whether existing grazing management practices or levels of grazing use on public lands are significant factors in failure to achieve the standards. For riparian areas where grazing is contributing to failure to meet standards of rangeland health, formulate, propose, and analyze appropriate action to address the failure to meet standards or to conform to the guidelines.	Appendix D - Alternative Components.pdf
King	Catherine	Utah Native Plant Society	Component of alternative proposed; water resources	Ensure that surface water ecosystems, including springs, streams and wetlands, are functioning and supporting the native flora and fauna of the region.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Component of alternative proposed; water resources	Facilitate recovery of degraded springs, riparian areas and wetlands through fencing or other management actions.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Component of alternative proposed; water resources	Maintain springs, riparian areas and wetlands that are in good condition through fencing or other management actions.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Component of alternative proposed; water resources	Manage spring health for cultural significance in addition to ecological significance.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Component of alternative proposed; water resources	Manage wetlands resources to ensure landscape resistance and resilience to disturbances due to climate change and drought.	UNPS on GSENM 2022 (1).docx
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; climate change	Goal 1 BLM will manage resources to ensure landscape resistance and resilience to disturbances due to climate change and drought. Objectives - Develop a Climate Adaptation Plan for the Monument	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; climate change	CLIM-1: Determine the effects of management actions and land uses (e.g., recreation, grazing, OHV use) on landscape resistance and resilience to climate change	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; climate change	CLIM-2: Baseline conditions will be documented, and subsequent monitoring will ensure that objects are not declining or degrading due to climate change or drought.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; climate change	CLIM-3: Determine the needs of plants and wildlife to migrate due to climate change. Identify and protect migration corridors both within the project area. Coordinate with adjacent land owners and agencies to extend corridors.	Appendix B - RNA Proposals.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; climate change	CLIM-4: Avoid implementation of actions that disturb soils and vegetation during drought.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; climate change	CLIM-5: Analyze the effects of land management actions such as vegetation treatments on carbon sequestration.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; climate change	CLIM-6: Use Best-Available Science and Traditional Knowledge. This includes the science expertise of the U.S. Geological Survey (USGS), including its National and Regional Climate Adaptation Science Centers (CASCs), bureau science programs, and other resources such as the U.S. Global Change Research Program's (USGCRP) National Climate Assessment. Decision-making will also consider traditional knowledge, and the Department will meaningfully engage with Tribes and other indigenous communities throughout decision-making processes that affect their interests.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; lands and realty	Goal 2 BLM will seek to acquire private inholdings within the Monument as they become available.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; lands and realty	Lands and Realty - Proposed Alternative Components Goal I BLM will manage discretionary uses and rights-of-way in undisturbed/ undeveloped Monument lands to protect Monument objects and values, including soil health.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; lands and realty	LAND-1: No new commercial rights-of-way (ROW) will be authorized outside of pre-existing designated utility corridors.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; lands and realty	LAND-2: Areas outside of existing, established ROW corridors will be ROW exclusion areas.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; lands and realty	LAND-3: Access ROWs to private inholdings will only be authorized if required by law or regulation, and will be subject to project-level NEPA analysis.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; lands and realty	LAND-4: Private landowners will be required to coordinate the development of access routes across public lands in order to prevent a proliferation of routes.	GESNM_Scoping_Comments.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; lands and realty	LAND-5: Rights-of-way may be allowed when necessary to exercise valid existing rights but will be located to minimize to the greatest extent practicable impacts to Monument objects and values.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; lands and realty	LAND-6: BLM may preemptively identify private inholdings within the Monument that would be top candidates for future acquisition into Monument lands, and seek opportunities for purchase of these lands if private owners are willing and the action would result in a net gain of objects and values within the Monument.106	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; lands and realty	LAND-7: BLM will prioritize acquiring valid existing rights-of-way that are within and bordering the Monument if they are adversely adjudicated against BLM under the Quiet Title Act.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; lands and realty	LAND-8: Rights-of-way will be maintained through the use of minimum necessary and appropriate tools. Rights-of-way within or impacting Wilderness Study Areas must be maintained with hand tools.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	As a national monument, there should be no alternative analyzed in the DEIS that considers managing the planning area as VRM Class III or IV. The most recent inventory of visual resources was completed in 2018, finding that "[a]lmost 50 percent of GSENM inventoried as High Scenic Quality and less than 1 percent inventoried as Low Scenic Quality" and that "[a]lmost 60 percent of GSENM inventoried as the public being highly sensitive to change in GSENM's landscape character, [and] only 2 percent of the area inventoried had low public sensitivity to change in the landscape character." (AMS 5-123). Inexplicably, the 2018 VRI identifies former SITLA sections within Wilderness Study Areas (WSA) as classes different from the surrounding WSA lands. (AMS Fig. 5-32). The inventory also identified a number of management areas adjacent to Glen Canyon National Recreation Area, Bryce Canyon National Park, and scenic backways as Class III or IV. Id. These VRI classifications simply make no sense, are inconsistent with the applicable proclamations, and would clearly harm both Monument objects and resources of the planning area at large, and are therefore indefensible. Relying on those aspects of the VRI to assign VRM Class III or IV management prescriptions would be contrary to applicable law, arbitrary and capricious. See, e.g., FLPMA, 43 U.S.C. § 1782(c); BLM Manual 6330.1.6(C)(4)(d).	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	Goal I Include mandatory management direction to protect and improve night skies to ensure that only natural sources of light are visible to the human eye throughout the Monument. Objectives 1- Manage public lands in a manner that will protect the quality and extent of dark night skies within the Monument for present and future generations. 2- Ensure the opportunity for Tribal coordination when making implementation-level decisions that have the potential to impact dark night skies.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	Goal 3 Protect viewsheds and visual resources in a manner consistent with Tribal values.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	Objectives 1- Manage public lands in a manner that will protect the quality of the scenic (visual) values of these lands for present and future generations. 2- Ensure the opportunity for Tribal coordination when making implementation-level decisions that have the potential to impact visual resources. 3- Promote Best Management Practices for reclamation of landscapes, restoration of native habitats, and rehabilitation of waterways and riparian areas to enhance natural and historical scenic values that have been negatively altered.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	Visual Resource Management - Proposed Alternative Components Goal I Manage Monument lands as VRM I and II with mandatory prescriptions to protect scenic values, especially areas with high conservation values such as lands with wilderness characteristics, backcountry recreation areas, scenic byway and backway corridors, eligible and suitable WSR segments, WSAs and ACECs.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	DNS - 3: Meet or exceed the standards for accreditation as an International Dark-Sky Association (IDA) International Dark Sky Sanctuary.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	DNS - 4: Limit the use of lights at Monument buildings and infrastructure in order to minimize impacts to night skies.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	DNS -1: Conduct an updated lighting inventory.	Appendix B - RNA Proposals.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	DNS -2: Develop and include in the RMP a lightscape management plan based on a robust set of dark night sky best management practices.	GESNM_Scoping_Comments.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	DNS -5: Coordinate with the Tribes regarding interpretive and educational programming regarding night skies.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	VRM-1: With limited exceptions for necessary facilities and temporary research projects that are managed consistent with the proper care and management of the Monument objects, bring Monument lands into conformance with VRM I and II classification standards.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	VRM-10: Restrict camping and parking at important viewsheds and overlooks as identified by Tribes.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	VRM-11: Coordinate with the Tribes about the interpretive value of different vantage points and viewsheds in the Monument.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	VRM-12: Identify important viewsheds in coordination with Tribes.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	VRM-13: Create interpretive materials in coordination with Tribes that highlight tribal connections to distant areas visible from vantage points within GSENM.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	VRM-2: Manage lands that are classified for the preservation of their natural values (such as primitive recreation areas, VSAs and lands with wilderness characteristics) to VRM I standards to "preserve the existing character of the landscape" with stipulations specifically addressing and managing human development impacts.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	VRM-3: Manage all acquired former SITLA inholdings to the VRM class of surrounding lands. (Example: All former SITLA parcels acquired within Wilderness Study Areas is to be managed as VRM Class I)	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	VRM-8: Build Monument buildings and infrastructure to blend into the landscape while retaining functionality.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; visual	VRM-9: Manage and design campgrounds to avoid negatively impacting the viewshed.	Appendix B - RNA Proposals.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Component of alternative proposed; visual	Landscape Characteristics including Visual Resources, Scenery, Dark Night Skies, Natural Soundscapes, and Air Quality As part of its analysis of landscape characteristics, the BLM should take a deep look at how to identifies, qualifies, and quantifies "objects" and what care/management is needed for the protection of each object. With the proclamation identifying so many generic, unspecific objects, such as landscapes, the BLM needs to specify what the objects are. For example, the proclamation identifies the entire landscape as an object, however, the entire landscape has changed over time and its preservation will mean different things depending on how one interprets the landscape. Is the BLM preserving the landscape as it was on the day of the reservation, as it was 10,000 years ago, 1,000 years ago, 100 years ago, or some arbitrary subjective belief of how it should be? This same dilemma exists with almost every generic object. For example, generic biological resources such as diverse, rare, and endemic populations of plants have changed and will continue to change in the future. Even more complex is that the rare and endemic populations are not identified. The BLM should try to identify these populations both in location and classification so that specific steps may be taken to "protect" them. Frederick the Great once said, "he who defends everything, defends nothing." Similar thoughts such as, "if everything is important then nothing is" illustrate this conundrum. Because the proclamation wholeheartedly lacks specificity, the BLM cannot effectively "protect" the amorphous objects.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; noise	Goal 1 Manage uses to protect and maintain the natural soundscape. Objectives - Design management actions to minimize artificial noise and avoid increases in background noise levels.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; noise	Goal 2 Protect wildlife species known to be sensitive to the effects of human caused noise. Objectives - Preserve animal and riparian habitats so that natural sounds prevail.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; noise	Goal 3 Protect visitor experience of natural quiet and solitude.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; noise	NS-1: Post signage indicating the need for low-voices and low-volumes, especially in backcountry areas.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; noise	NS-2: Prohibit the use of drones.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; noise	NS-3: Prohibit the use of amplified music devices in back-country areas.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; noise	NS-4: Prohibit motorized vehicle use causing noise levels exceeding 55 db, including through installation of speed bumps or other speed barriers in areas of high-velocity OHV traffic to help preserve soundscapes.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; noise	NS-5: Work with FAA to designate Monument as protected airspace and prohibit commercial air tours.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; noise	NS-6: Recommend to the FAA that civilian aircraft be prohibited from flying lower than 1,500 feet above the ground, with exceptions for search and rescue or other actions required to protect Monument objects.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; noise	NS-7: Secure cooperation from Department of Defense to avoid low-elevation military flights to the maximum extent possible.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; noise	NS-8: Conduct soundscape modeling for management actions with the potential to alter baseline soundscape conditions.	Appendix D - Alternative Components.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Component of alternative proposed; noise	NS-9: Develop a soundscape management and monitoring plan, in consultation with Tribes, that: - Identifies noise-sensitive receptors (e.g., important wildlife habitat, WSAs, Lands with Wilderness Characteristics, developed and primitive recreation locations, other areas where anthropogenic noise is impairing visitors or wildlife), as well as front-country and back-country sound zones; - Sets noise thresholds that modeled and actual/monitored sound levels cannot increase near noise-sensitive receptors and in back-country sound zones and designs management actions accordingly; - Sets objectives of reducing background noise in front-country areas where natural soundscape is impaired and impacting visitor experience and designs management actions accordingly; - Includes a monitoring plan.	Appendix A - Figures & Tables.pdf
Stacey	Craig	N/A	Component of alternative proposed; noise	Limit drones, and aerial motorized traffic.	1451.jpg
J	A	N/A	No action alternative	TRIBAL CONSULTATION: Let's see more language about tribal consultation in terms of this plan, adaptive management, various activities (e.g. fire fighting) and projects (e.g. tamarisk or russian olive removal).	GSENM_20220923.docx
Not Provided	I worked for BLM so I know the truth	N/A	No action alternative	BLM should reverse its current process for evaluating GSENM manager and employee performance. Now they are rewarded for being loyal to the status quo and doing what local Mormon ranchers and county commissioners want. This is the opposite of responsible management of a national monument.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	No action alternative	7.2 NO ACTION is better, but it emphasizes management flexibility. Route maintenance SHOULD BE INCLUDED to protect the traveling public.	N/A
Pollock	Leland	Garfield County Commission	No action alternative	We are also discouraged to find that aside from the "No Action Alternative," all other alternatives would change the entire monument to limited or closed to OHV use. This would restrict the Little Desert OHV Open Area to existing routes. The open area is extremely small consisting of .005% of the planning area. This area is located adjacent to Escalante Town and has been used by locals for OHV recreation. We do not support any actions to close this area.	Garfield County Commission.pdf
Bunting	Gavin	Bunting Livestock	Range of alternatives	These public lands need to continue to be open for all people & uses as they have been for centuries. Access routes, all use permits, hunting, and enjoyment needs to be kept open for all. Utilizing all of our natural resources but managed with reason & respect	N/A
Action Committee	CTVA	Capital Trail Vehicle Association	Range of alternatives	The agency should adequately consider that a sense of magnitude should be used in the evaluations and decision-making so that potential impacts on fish and wildlife are compared to the naturally occurring range of impacts and that this approach is necessary in order to keep decisions from being arbitrary and capricious.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Range of alternatives	The agency should adequately consider that developing and selecting a robust multiple-use alternative as opposed to a marginalized multiple-use alternative would better serve the over-arching needs of the public.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Range of alternatives	The agency should adequately consider the acres per wilderness visitor versus acres per multiple-use visitor both before and after the proposed action.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Range of alternatives	The agency should seek to develop an alternative and analysis that would provide a reasonable level of multiple-use and a decision that would provide more motorized access and motorized recreation.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Popejoy	Mike	Grand Canyon Trust	Range of alternatives	Allowed actions and uses need to be reviewed as part of the planning process to determine if they are compatible with the need to protect Monument objects and values in accordance with legal obligations cited earlier. We request that the compatibility analysis include the elements listed below. These recommendations are informed by the National Monuments, National Conservation Areas, and Similar Designations Compatibility Analysis Framework and the Glen Canyon NRA Values and Purposes Determination Grand Staircase-Escalante National Monument Rangeland Health EIS. 1.Determine if the action or use is discretionary. Is the action or use one mandated in the Proclamation? Because livestock grazing may be allowed under requirements to protect Monument objects and values, it is considered discretionary. 2.Using the science focus of this Monument, develop a means to measure objects to determine impairment. 3.Assess if current monitoring and assessment methods are adequate in determining the condition of Monument objects and values. 4.Where needed, design additional monitoring methods suited to the conservation protection required for this Monument. 5.Assess the condition of objects and report on their condition using maps and descriptions of impaired objects. 6.Determine the cause of the noted impairment. 7.Assess the manner and degree of uses and actions that will impair objects. 8.Include the public and Tribes in each step of this process for major uses and impacted areas.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Range of alternatives	Any activity within the Monument needs to be designed to ensure that Monument objects are not harmed, degraded, or impaired by such activity. In developing alternatives BLM must assess if activities that would be permitted under the alternative would harm Monument objects. The National Monuments, National Conservation Areas, and Similar Designations Compatibility Analysis Framework provides a framework to assess uses within monuments and determine if a use is compatible with providing protection of the monument values and objects. Such analysis should be incorporated into the NEPA analysis concerning management decisions for the Monument, and discretionary uses (uses not required by law) should only be allowed if compatible. "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." BLM Manual 6220, National Monuments, National Conservation Areas, and Similar Designations.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Range of alternatives	As with Alternative B, Alternative C fails to meet the purpose and need of the RMP. Alternative C would emphasize recreation. While Proclamation 10286 specifically notes that the Monument provides world-class recreation opportunities that support a travel and tourism sector, recreation is not an object or value for which the Monument was designated. Proclamation 10286 notes that some of the objects for which the Monument was designated are sacred to Tribes, rare, fragile, vulnerable to vandalism and theft, or dangerous to visit. The Proclamation itself therefore seems to recognize that turning the Monument into a word-class recreation destination is inconsistent with preservation of at least some objects. This is not to say that the Agency should not manage for recreation, but there is a difference between managing primarily for preservation and protection of objects for which the Monument was designated while also supporting and managing for the tourism that may result, and actively trying to facilitate additional tourism. To the extent Alternative C would be actively trying to facilitate additional tourism by emphasizing providing for world-class recreational opportunities, we believe this is incompatible with the purpose and need of the management plan and that it should therefore be treated as an alternative considered but eliminated from detailed analysis.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Range of alternatives	In accordance with Proclamation 10286, BLM must manage the Monument for the protection and preservation of its historic, prehistoric, and scientific values, and only allow uses other than those needed for protection of Monument objects when those uses do not conflict with the directives of the Proclamation. "The Secretary of the Interior (Secretary) shall manage the Monument through the Bureau of Land Management (BLM), as a unit of the National Landscape Conservation System, and in accordance with the terms, conditions, and management direction provided by this proclamation." Proclamation No. 10286. Accordingly, the standard approach of multiple-use management does not apply, and any effort to adopt such a management approach to the detriment of the Monument's natural, cultural, historic, and scientific values violates the Proclamation.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Range of alternatives	The Antiquities Act mandates prioritizing the protection of Monument objects and values over discretionary uses, such as rights-of-way development and vegetation management. Monument proclamations have the force of law and the relevant agencies must manage these lands for the protection of Monument objects. In regard to the Upper Missouri River Breaks National Monument in Montana, the U.S. Ninth Circuit Court of Appeals found "[t]he national monument designation changed the status quo for the Upper Missouri River Breaks area, elevating protection of the 'biological, geological, and historical objects of interest.'" Montana Wilderness Association v. Connell, 725 F.3d 988, 1011 (9th Cir. 2013). In another case involving the Upper Missouri River Breaks National Monument, the Ninth Circuit held that "[t]he Proclamation changed the legal landscape [for the Monument] and BLM must consider this change in determining the reasonable range of alternatives that should be carefully analyzed. BLM must consider both the terms of the Proclamation and the objects of the Proclamation to be preserved before taking actions that can affect Monument objects." Western Watersheds Project v. Abbey, 719 F.3d 1035, 1053 (9th Cir. 2013).	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Range of alternatives	We have concerns that preliminary alternatives B and C as described in the AMS do not meet the purpose and need of protecting objects identified in Proclamations 10286 and 6920. Alternative B would maintain current management for GSENM according to the 2020 GSENM Management Plan and expand it to the full boundary to cover the former KEPA areas. Some management identified for the former KEPA would be changed to protect, restore, and/or increase resiliency of GSENM objects and values. The management approach in the 2020 GSENM management plan is based on management direction in Proclamation 9682, which in some cases is inconsistent with the management direction in Proclamation 10286 and 6920. For instance, Proclamation 9682 allows for greater motorized use than Proclamation 10286: "Consistent with protection of the objects identified above and other applicable law, the Secretary may allow motorized and non-mechanized vehicle use on roads and trails existing immediately before the issuance of Proclamation 6920 and maintain roads and trails for such use." Proclamation 10286 provides that the BLM shall develop and prepare a new management plan "for purposes of protecting and restoring the objects identified above and in Proclamation 6920."	Appendix B - RNA Proposals.pdf
Esplin	Eric	Kane County Conservation Board of Directors	Range of alternatives	The district recommends active watershed improvements within the monument boundaries and maintaining grazing permits (AUMs) and projects that will benefit livestock and wildlife and improve water quality and quantity. The district also recommends that our local roads within Kane and Garfield counties stay open and maintained for public and land users within the monument.	N/A
Esplin	Eric	Kane County Conservation Board of Directors	Range of alternatives	Best management practices (BMPs) such as treating vast monocultures of pinyon/juniper and decadent sagebrush areas, water developments, reseeding grasses and forbes for livestock and wildlife, and participating with local, state, and federal resources agencies to leverage funding for important conservation projects will benefit the watersheds and landscapes of the vast majority of the monument boundaries.	N/A
Cutler	Clayton	Kane County Utah	Range of alternatives	The County defines multiple-use as the consumptive and non-consumptive uses historically and traditionally allowed to occur on federal and state lands within the county. These uses include, but are not limited to: livestock grazing, hunting, fishing, mining, mineral exploration and extraction, recreation, wildlife habitat management, telecommunications, water resource development and use, protection and development of timber/woodland products, utility corridors, county transportation, and circulation roads and corridors. The County asserts that the above uses, as well as many others, are compatible in most management situations. True multiple-use management creates opportunities for the land to be used for many purposes simultaneously. The Preliminary Range of Alternatives presented give no example of grazing and recreation compatible. The County encourages the BLM to reevaluate the alternatives to favor both uses and not one or the other.	Scoping Letter GSENM -signed.pdf
Todd	Robin	Maryland Ornithological Society	Range of alternatives	In the new management plan, BLM should give the highest priority to protecting the objects of historic and scientific interest for which the monument was designated, including sacred Native American sites, paleontological sites, and those with significant biological and ecological values. Those objects are described in Proclamations 6920 and 10286.	MOSltrr_GrandStaircaseScopingSep2022.pdf
Dissel	Scott	N/A	Range of alternatives	-Of course, human visitors should be allowed to experience the Monument, its unique solitude, silence, awe-inspiring landscape and especially its wilderness character. While I urge you to protect the resources to the greatest extent possible, I also urge you to use existing roads, campgrounds, camping areas (including disbursed camping areas) to allow for visitation rather than create new areas. These areas must be delineated, signed, and enforced as needed to prevent the damage caused by visitors who insist on finding, creating, or building new parking, camping, trails, routes, or recreational sites.	Grand Staircase Escalante Management Plan comments 9.27.2022.pdf
Sorenson	Craig	N/A	Range of alternatives	- Updates and improvements to the 2000 Management Plan include protections for all Objects of Historic or Scientific Interest in the 2021 Proclamation. In order to do this BLM needs to prohibit mechanical treatments of sagebrush, pinyon pine, juniper and other vegetation and use only native species for restoration and post-fire seeding. Old growth forests, including pinyon and juniper trees more than 150 years, need protection for important wildlife habitat. The monument has threatened Mexican Spotted Owls, endangered Southwestern Willow Flycatchers and pinyon jays that need their habitats protected.	GSENM Management Plan Comments.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Biggs	Duan	N/A	Range of alternatives	a. Collaboration between ranchers, livestock owners, and conservation In other parts of the world such as South Africa and Australia successful collaboration between livestock owners, ranchers, and grazing stakeholders has been achieved to strengthen ecological and conservation outcomes whilst supporting the cultural history and livelihoods of livestock owners. The processes, policies, and mechanisms through which this was achieved may hold insights for novel approaches and alternatives in GSENM. b. Conflict reduction and transformation through dialogue processes In other conflictual arenas, including armed political conflicts in different parts of the world, land tenure and reform, water use, and re-introduction of contested animals such as wolves, structured processes of conflict mediation, dialogue, and transformation have led to the creation of a more collaborative, constructive and less conflictual environments. Building on (a) and (b) we would like to propose two streams of potentially inter-related activities for consideration: 1. A dialogue process to reduce and transform conflict between grazing and conservation on GSENM. This could also include and involve aspects of conflict over restoration. 2. Exploration of novel approaches to create incentives for ranchers to contribute to land restoration and conservation, drawing on examples from elsewhere in the world.	Comments in Scoping Period for the Revision of a Resource Management Plan.docx
John	Brandi	N/A	Range of alternatives	As popularity for outdoor recreation grows, the BLM should be looking at ways to provide reasonable access that will sustain the growing numbers of visitation. Often agencies try to address increased use through closures, restrictions, and reservation systems. Each of these approaches is inferior since they create a scarcity of access, which concentrates use in remaining areas. BLM should plan for opening more areas, routes, and amenities to accommodate increased public demand to utilize public lands. Furthermore, recent studies are starting to emerge that show that reservation systems are discriminatory. BLM shouldn't develop an RMP that plans for the creation of reservation systems. I believe the BLM needs to adequately comply with NEPA during any management planning process. There needs to be a true multiple use alternative created and not just simply varying degrees of closures. BLM is required to analyze a broad range of alternatives. Analyzing more access on the monument would be appropriate for an alternative.	N/A
Lish	Christopher	N/A	Range of alternatives	Grand Staircase-Escalante National Monument was designated to protect irreplaceable scientific, ecological and paleontological resources. I'm counting on you to create a management plan that fulfills the mission of the monument and prioritizes conservation and biodiversity protection for this incredible and irreplaceable landscape. I urge you to choose the most protective management alternative for the monument; one that recognizes tribal communities and the millions of people who have expressed support for and care about these places, while ensuring healthy national parks and monuments and a vibrant, sustainable tourism economy.	220926_doi-blm-ut-p010-2022-0006-rmp-eis_grand_staircase-escalante.pdf
Weppner	William	N/A	Range of alternatives	I believe the BLM needs to adequately comply with NEPA during any management planning process. There needs to be a true multiple use alternative created and not just simply varying degrees of closures. BLM is required to analyze a broad range of alternatives.	N/A
Crews	Michael	N/A	Range of alternatives	I urge you to choose the most protective management alternative for the monument; one that recognizes tribal communities and the millions of people who have expressed support for and care about these places, while ensuring healthy national parks and monuments and a vibrant, sustainable tourism economy.	N/A
Strobel	Joan	N/A	Range of alternatives	In order to protect the unspoiled natural area, activities that require significant disturbance, such as livestock grazing, air touring, mechanical manipulation of vegetation, and any motorized travel, must be well regulated to protect the opportunities for quiet recreation and solitude.	N/A
Knudsen	Elaine	N/A	Range of alternatives	Lands in the GSENM should remain open for multiple use i.e., livestock grazing, hunting, fishing, mineral exploration, mining, recreation, wildlife habitat management, telecommunications, water resource development and use, protection and development of timber/woodland products, utility corridors, county transportation, and circulation roads and corridors.	Knudsen - BLM Comments - September 2022.docx
Sjogren	Morgan	N/A	Range of alternatives	Range of Alternatives I am concerned about preliminary GSENM management plan alternatives b and c because they do not meet the requirements of protecting objects identified in Proclamations 10286 and 6920. Alternative B falls short of requirements listed in 10286 and caters to the Proclamation 6920. 10286 also requires the BLM to create a new management plan "for purposes of protecting and restoring the objects identified above and in Proclamation 6920." Recycling a management plan from 2020 does not qualify. Alternative B does not include new monument objects listed in 10286 including protection of sacred sites and permitting gathering of traditional plants and medicine. Alternative B needs to be replaced with an updated version that meets the requirements of Proclamation 10286. Alternative C emphasizes recreation over the science monument's designated purpose to preserve and protect monument objects. While recreation is included in 10286, it is not considered a monument object. Increasing and promoting recreation also has the potential to directly harm/impact objects 10286 deems require protection especially those of cultural significance to local Tribes that are rare, fragile, or vulnerable to looting and vandalism. Recreation needs to be a part of the management plan but cannot be the focus above protecting monument objects. As an avid hiker, I recognize this when considering how my own recreation outings, making sure my outings do not harm monument objects. In the hiking guidebook I wrote about GSENM, I make it a point to emphasize that visiting with respect is paramount to recreation, and that hikes are most appropriate in areas that are well-known/BLM managed focal hikes/sites, which steer the public away from more sensitive areas/monument objects. A primary focus of recreation needs to be placed on public education in order to support the monument's purpose to protect/preserve monument objects.	40 Mile Gulch _ 2 May 2020.pdf
Not Provided	Jaden	N/A	Range of alternatives	5. The primary purpose of the monument is to protect the landscape and its scientific, natural, scenic, and cultural resources, not to facilitate expansive recreation, which has a high potential to harm these monument values.	N/A
Dissel	Scott	N/A	Range of alternatives	Further, as an employee of the Denver Museum of Nature and Science for 5 years, and generally a student of natural history, I am familiar with the scientific value, and the unique geologic, paleontologic, archaeological, anthropologic and other values that the designation of this Monument was intended to protect. I also have read and studied about the natural resources there. With this letter, I urge you to prioritize the protection of the above values, above all others, when considering the activities you will allow, or restrict, under the new RMP. GSENM is unique in that it is the "Science Monument" and in keeping with that original purpose, must be managed in reliance upon, and in protection of the ability to continue to implement scientific research, while at the same time allowing reasonable access and accommodation for human-powered, quiet recreation which is consistent with its wilderness character.	Grand Staircase Escalante Management Plan comments 9.27.2022.pdf
Davis	Emily	N/A	Range of alternatives	Grand Staircase Escalante was designated to protect a variety of spectacular geologic, ecosystem, visual, historic, paleontological, and cultural resources. It must not be managed as a recreational area. Those areas that qualify as wilderness should be left road-free, protected as wilderness and designated as Wilderness Study Areas.	N/A



Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Weaver	Brad	N/A	Range of alternatives	National Monuments, including the GSENM are established to preserve and protect the resources contained therein. Any human use of the GSENM should be undertaken in such a way as to preserve and protect the resources for which the GSENM was established in the first place. These resources include geologic, paleontological, ecological, historic, cultural and visual/aesthetic resources, to name a few. In planning and permitting, recreational or commercial uses of the GSENM should always be subordinate to preservation and protection of GSENM's defining resources. In planning and permitting, the "zero action" option should be and remain first in order of preference. Actions that enhance resource protections or public health and safety should receive appropriate consideration as compared with no action.	GSENM Scoping Comments.pdf
Lish	Christopher	N/A	Range of alternatives	The BLM should also, once again, prioritize preserving clean air, dark night skies, unspoiled vistas, natural and quiet soundscapes, native plants and wildlife, geologic and paleontological resources in the monument.	220926_doi-blm-ut-p010-2022-0006-rmp-eis_grand_staircase-escalante.pdf
Spotts	Richard	N/A	Range of alternatives	The DEIS should clearly explain where BLM managers do or do not have discretion to make management decisions. Where there is some proper discretion, the DEIS should analyze a reasonable range of management alternatives to achieve effective object protection. However, none of these alternatives could jeopardize objects. Relevant resources and issues for DEIS analysis include soils, biological soil crusts, vegetation, wildlife, special status species, water quality and quantity, recreation, livestock grazing, veg treatments, private and state inholdings, RS 2477 claims, ACECs, wilderness study areas, fossils, and climate change/drought.	N/A
Belles	Mark	N/A	Range of alternatives	Desired outcome #7 related to "Protect and restore Monument objects and values within a multiple-use context" needs to allow for and emphasize that historical grazing and extractive activities which may continue due to valid existing rights, should be slowly phased out as rights expire or are voluntarily surrendered or retired. Management should in no way promote or extend these practices, simply because they are historical. It is understood that valid existing rights must be respected. However these past practices, so destructive to this precious place, should not be preserved beyond legal obligations.	N/A
Black	Trout	N/A	Range of alternatives	Take down all the no-longer-used fencing.	N/A
Brown	Tom	N/A	Range of alternatives	President Biden's reestablishment of the original boundaries of GSENM has given us a golden opportunity to write a management plan that truly protects and preserves this spectacular area of southern Utah. It was originally designated a National Monument because of its stunning scenery, unique ecosystems, geologic and paleontological resources, and cultural significance. Thus, it should not be managed with a recreation focus. The original management plan limited recreation and motorized use to designated zones and routes. There is no need to change these well thought out guidelines.	N/A
Cuomo	John	N/A	Range of alternatives	Please conserve and protect the monument and keep the original boundaries protected and safe from noise, degradation of soils and native plants. Protect animals, the night skies, over visitation by keeping visitor center to minimum and only in more accessible front of monument boundaries, versus in the backcountry. We need to keep some land as is. Once its gone we have lost it forever.	N/A
Falcon	Jennifer	N/A	Range of alternatives	On public lands there should be absolutely no grazing, drilling or other use by private businesses.	N/A
Kisko	Michael	N/A	Range of alternatives	Further, clean fresh pure water is the most precious thing on Earth. More precious than gold, diamonds, oil, etc. It is especially precious in red rock country. Please exclude or minimize oil and gas production in or near the monument to preserve the springs, seeps, creeks, and rivers. Once they are polluted for short term gain they will be ruined and potentially sicken local residents for many generations.	N/A
Not Provided	GSENM is threatened by those paid to protect it	N/A	Range of alternatives	Please stop harmful human uses in GSENM that are illegal because they damage monument objects. BLM has corruptly allowed those uses because BLM managers are cowards. Livestock grazing is the worst and most widespread problem followed by motorized recreation.	N/A
Not Provided	Utah resident	N/A	Range of alternatives	The dominant GSENM RMP goal should be the successful protection and restoration of all monument objects. The objectives should flow from this goal. Management actions to achieve should focus on eliminating harmful human uses and reclaiming degraded lands. The desired outcomes are healthy objects that are resilient and able to cope with drought and climate change.	N/A
Not Provided	Utah resident and BLM land user	N/A	Range of alternatives	The alternatives analyzed can evaluate different methods to accomplish that required protection. But no alternative can allow for any approved land uses or BLM management actions that could destroy, degrade, or jeopardize GSENM objects and values. BLM can only evaluate proposed actions that are within its legal authority and administrative discretion.	N/A
Smith	Margaret	N/A	Range of alternatives	I strongly support whatever protective measures the Monument managers can put into place that will enforce travel policy and limit disruption and disturbance across the landscape. Humans do not need access to absolutely everywhere. Other species, other ecosystems need the space, darkness, quiet, expanse in which to thrive.	N/A
waggoner	kristina	N/A	Range of alternatives	Most of the monument should be preserved within the primitive zone. This zone should be managed to create and preserve a true wilderness experience for the visitors, and it should be limited to foot and horseback travel so the ecosystem within it can remain pristine for scientific research.	N/A
waggoner	kristina	N/A	Range of alternatives	I think the monument should be managed under the original Zonal Districts created in the 2000 management plan. We have been working under that template for the last 26 years. All of the communities adjacent to the monument are familiar with the zonal management and if it changed it would be hard for them to adapt.	N/A
Whipperman DVM	James	N/A	Range of alternatives	What has become obvious to me is that cattle grazing and off road vehicle use must be carefully regulated if not completely eliminated	N/A
Not Provided	Friend of GSENM	N/A	Range of alternatives	Cattle grazing, range improvements, and pinyon juniper eradication projects for ranchers are the most widespread threats to GSENM objects and values.	N/A
Not Provided	I know the reality at GSENM	N/A	Range of alternatives	Livestock grazing and OHV recreation are especially damaging to GSENM objects and values. The new RMP should end those deleterious land uses.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Not Provided	Not Provided	N/A	Range of alternatives	I think that development on the monument should be limited to areas closely adjacent to the paved and well-traveled corridors within the monument, such as calf creek and devil's garden, Also, there is a tiny allotment 5 miles west of Escalante that is next to several pieces of private land. It is unmanageable because it's where upper valley creek and birch creek come together. The floods on those creeks make virtually impossible to fence preventing cows from coming onto private lands. Also, there is a cattle guard on Main Canyon rd right before North Creek rd. When the cows come off the mountain, they tend to bunch up there and affect the private properties surrounding the area.	N/A
MacNulty	Cory	National Parks Conservation Association	Range of alternatives	The National Parks Conservation Association and the Coalition to Protect America's National Parks urge you to choose the most protective management alternative for the monument; one that recognizes Tribal communities and the millions of people who have expressed support for and care about these places, while ensuring healthy national parks and monuments and a vibrant, sustainable tourism economy.	N/A
MacNulty	Cory	National Parks Conservation Association	Range of alternatives	We ask BLM to move forward with a plan that embraces this "exceptional and inimitable landscape filled with an unparalleled diversity of resources." in a manner that protects neighboring national parks, is consistent with existing law and preserves our natural and cultural history.	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Range of alternatives	Valid Existing Rights. The Proclamation specifically states that: "This proclamation is subject to valid existing rights." I 38 The State would recommend that the BLM conduct a full analysis of what types of "valid existing rights" exist in the GSENM. Such rights could include valid existing mining claims or grazing preference rights bought and sold by ranchers in coordination with grazing allotments.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Miller	Scott	The Wilderness Society	Range of alternatives	These supplemental comments describe the significant ecological connectivity, ecological integrity, and biological diversity values that GSENM contain in hopes that it will help the BLM to craft an RMP that protects and connects ecological values within and adjacent to the monument. (1) Doing so would be consistent with: (a) the Biden Administration's commitments to limit global warming to 1.5 degrees Celsius and conserve 30% of U.S. lands and waters by 2030, (2) as well as with the principles outlined by the Interior Department in its America the Beautiful Report; (3)(b) BLM's legal obligations under the Antiquities Act, the Federal Land Policy & Management Act (FLPMA) and other relevant laws and policies; and (c) new scientific information and spatial data that allow BLM to map, quantify, and track changes in landscape conditions, biodiversity and connectivity priorities.	GSENM TWS Scoping Supplement 2022.docx
McCoy	Melissa	U.S. EPA Region 8	Range of alternatives	We recommend the Draft EIS: present the environmental impacts of the proposed action and alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision-maker and the public (40 CFR § 1502.14(b)); describe how each alternative was developed, how it addresses plan objectives, and how it will be implemented; quantify the potential environmental impacts of each alternative to the greatest extent practicable (e.g., acres of habitat impacted; changes in water and air quality); and clearly delineate differences in impacts between alternatives analyzed. We also recommend comparing the costs and benefits of each of the alternatives, including the costs for required mitigation measures. Further, we recommend discussing reasons for eliminating alternatives to the proposed action (40 CFR § 1502.14(a)).	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Snyder	Shannon	U.S. EPA Region 8	Range of alternatives	EPA recommends that BLM explore and objectively consider a full range of alternatives and evaluate in detail all reasonable alternatives that fulfill the plan's purpose and need. We encourage selection of alternatives that protect, restore, and enhance the environment, and we also support efforts to identify and select alternatives that maximize environmental benefits and avoid, minimize, and/or otherwise mitigate environmental impacts. EPA is available to assist BLM in alternatives development, if needed.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Campbell	Todd	University of Tampa	Range of alternatives	Of the alternatives laid out in the assessment of the current management plan, Alternatives D or E are the best for the aquatic systems with E being the best but having the most limitations on other aspects of the management plan. Alternative E would advocate for the removal of Russian Olive and other non-native species and prioritize natural process for the reintroduction of native species. Additionally, grazing would be severely limited with Alternative E and have some slight impacts on recreation and ORV usage, limiting it to designated trails. This would also include foot traffic. Berend, Kevin. "Riparian Restoration: Escalante River Watershed Partnership - ERWP." Escalante River Watershed Protection ERWP Southern Utah. Maffy, Brian. "Cattle Could Return to Escalante Tributaries under New Grand Staircase Monument Plan." The Salt Lake Tribune, 10 Mar. 2020.	N/A
Goreham	Dennis	Wasatch Mountain Club	Range of alternatives	Presidential Proclamation 10286 says "The entire Grand Staircase-Escalante landscape is an object of historic and scientific interest requiring protection under the Antiquities Act." Much of the reasoning for creating this National Monument was for scientific and educational purposes. We believe recreation and other multiple uses should be managed in a way to avoid any incremental degradation, so that the unique value of this largely unspoiled natural landscape is retained.	GSENM WMC comment 09182022.doc
Walker	Joro	Western Resource Advocates (WRA)	Range of alternatives	Thus, because the Monument's wildlife and plant rely on ecological intactness and richness, BLM is duty bound to safeguard intactness as a necessarily means for safeguarding the Monument's wildlife and plant Objects. As the Proclamations confirm, large intact landscapes are necessary to support biodiversity, protect watersheds and healthy ecosystems, and provide connectivity that facilitates wildlife migration, seasonal movement and dispersal of young - the exact values designated by the Proclamations and necessary to protect the Monument's wildlife and plant objects. Therefore, BLM must consider and adopt a management scenario that fulfills the agency's obligation to safeguard and restore ecological intactness as a means to caring for the wildlife species and plant communities designated as Monument Objects by the Proclamations.	wra gsenm rmp scoping 9 18 2022.pdf
Walker	Joro	Western Resource Advocates (WRA)	Range of alternatives	BLM must also thoroughly address the direct, indirect and cumulative impacts of the management alternatives on scenic values, visibility, water quality, plants and animals in the Monument.	wra gsenm rmp scoping 9 18 2022.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Action Committee	CTVA	Capital Trail Vehicle Association	Best available information-baseline data	18. Motorized References Should Be Adequately Considered 1. The analysis should adequately consider all information and references that; a.Support the need for motorized recreation, b.Document the value of motorized recreation to both the economy and human health, c.Identify alternatives that mitigate any impacts that are adequately documented, d.Develop alternatives that enhance motorized recreation. e.Available motorized trail design and maintenance references include: 1.Trail Construction and Maintenance Notebook USDA 2.A Comprehensive Framework for OHV Trail Mgmt USDA 3.Sustainable ATV Trails USDA 4.Designing Sustainable OHV Trails USDA 5.Keeping water off the trail USDA 6.Off-Highway Vehicle Program Route and Designation Guide USDA 7.Standard Trail Plans and Specifications USDA 8.Sustainable Trail Bridge Design USDA 9.Marshall University OHV Courses 10.https://nohvcc.org/assistance/manager-assistance/online-resource-hub/ 11.NOHVCC Webinars 12.https://nohvcc.org/economic-impact-studies/ 13.https://nohvcc.org/assistance/manager-assistance/great-trails-projects/ 14.https://nohvcc.org/education/manager-education/great-trails-guidebook/ 15.ATV Route Guideline Manual 16.Wernex Report for Design Construction Maintenance AMA 17.Off Highway Motorcycle and ATV Trail Management U of I 18.https://go.campendium.com/wp-content/uploads/2022/03/2022CamperReport.pdf 19.Slow and Say Hello	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Best available information-baseline data	The agency should adequately consider that repeating a statement until you believe it is true is not a replacement for site-specific data. For example, there is no site-specific data supporting the statement that wildlife are negatively affected by OHV trails. There is data that supports wildlife using motorized routes and promoting their movement such as the Swan Valley grizzly bear study. Therefore, motorized routes can enhance the movement of wildlife through forested areas that are impassable by downfall.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Best available information-baseline data	The Dyrt's 2022 Camping Report ( https://reports.thedyrt.com/2022-camping-report/ ) found that it is 3x harder to book a campground now than in pre-pandemic years. While over 8 million new people joined the camping community last year, the campground and dispersed camping capacity has not increased.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Murray	Michael B.	Coalition to Protect America's National Parks	Best available information-baseline data	Livestock Grazing Management Livestock grazing within and adjacent to protected landscapes, if poorly managed, can affect the health of key water sources and watersheds, vegetation communities, important wildlife habitat, and entire ecosystems. When addressing livestock grazing levels and administration within the GSENM landscape, we urge BLM to base management decisions on scientific data, robust monitoring of forage availability, rangeland and ecosystem health and to take an adaptive approach to ensure the resiliency of our public lands in the face of a changing climate.	NPCA & Coalition GSE RMP scoping FINAL.pdf
Popejoy	Mike	Grand Canyon Trust	Best available information-baseline data	A recently released literature review and report on recreation ecology in the Colorado Plateau, including Utah, Outdoor Recreation and Ecological Disturbance, A Review of Research and Implications for Management of the Colorado Plateau Province69 (Recreation Report), synthesizes over 60-years of published scientific research to identify the environmental impacts of non-motorized recreation and provides a variety of effective management strategies to accommodate growing recreation demands while maintaining ecological integrity. 69 Authored by Doctor Christopher Monz, Ph.D., Utah State University Ecology Center and Institute of Outdoor Recreation and Tourism	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Best available information-baseline data	In response to the absence of recent grazing capacity analysis, the conservation community collected agency data from NRCS, added to BLM's field data collection with supplemental surveys, conducted a comprehensive review of methods to determine grazing capacity and produced a study which was supplied to BLM in 2003. In 2003, we provided the Monument with detailed methods to assess grazing capacity.55 These methods used GIS to apply current science, more current vegetation data, and criteria suited to local habitat to determine the grazing capacity for individual allotments in the Monument. We ask that this analysis and methods be included in these scoping comments and applied to an updated capacity analysis as part of the RMP process. 55 Catlin, J., Carter, J., & Jones, A. (2003). A science based tool for assessing available forage and grazing capacity of GSENM grazing allotments to meet rangeland health standards.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Best available information-baseline data	Instead, the relatively low cover of cheatgrass on the Monument is an opportunity for early intervention. According to a BLM report on the Monument's Buckskin Mountain, seeding native species can be an effective method for controlling the spread of emergent weed seedlings. 23 The report cites Floyd-Hanna et al. (2001)24 who found that aerial seeding of native species reduced post-fire musk thistle invasion in pinyon-juniper sites in Mesa Verde National Park. Seeding native grasses, especially squirreltail, in the late fall to early winter has been successful in reducing cheatgrass infestation, because native grasses grow more rapidly at low temperatures and can compete with cheatgrass seedlings when they emerge early the following spring. 25,26 These are the kinds of tools BLM should be selecting from the toolbox first rather than expensive, risky fuels treatments. 23 Bureau of Land Management. (2004). Landscape Assessment for the Buckskin Mountain Area, Wildlife Habitat Improvement. All U.S. Government Documents (Utah Regional Depository). Paper 77. https://digitalcommons.usu.edu/govdocs/77. 24 Floyd-Hanna L, WH Romme, and DD Hanna. Abstract: Patterns of weed invasion and treatment effectiveness after fires in Mesa Verde National Park, southwestern Colorado. Proceedings: 6th Biennial conference of research on the Colorado Plateau, November 5-8, 2001; Flagstaff, Arizona 25 Monsen, SB. (1994). The competitive influences of cheatgrass (Bromus tectorum) on site restoration. In: Monsen, SB, and SG Kitchen. Proceedings: ecology and management of annual rangelands. General Technical Report INT-GTR-313. USDA Forest Service, Intermountain Research Station. Ogden, Utah. 26 Beckstead J, SE Meyer, and PS Allen. (1995). Effects of after ripening on cheatgrass (Bromus tectorum) and squirreltail (Elymus elymoides) germination. In: Roundy BA, ED McArthur, JS Haley, and DK Mann, comps. Proceedings: Wildland shrub and arid land restoration. General Technical Report INT-GTR-315. USDA Forest Service, Intermountain Research Station. Ogden, Utah.	Appendix C - ACECs.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Best available information-baseline data	We believe that care should be taken to not adversely impact local pinyon jay populations. Pinyon-juniper removal can have detrimental effects on pinyon jays, most concerning removal of traditional nesting sites and elimination of important nut-producing pinyon pines. Many planning efforts use a standard nesting season for analyzing impacts to migratory birds, generally April or May 1 to July 31. This includes guidance provided in the 2020 RMP. However, recent research has shown that this window is not appropriate for pinyon jays, and that standard surveys for other birds are likely not adequate for pinyon jays. In addition, pinyon jays appear to prefer nesting in small trees at the woodland-shrubland interface, which many pinyon-juniper removal projects target. Pinyon jays can have very high nest site fidelity. Marzluff and Balda (1992) documented a flock that bred at the same site each of the 14 years that this flock was observed, and for another flock documented 5 different nesting sites that were each used 9 times. <sup>88</sup> The following measures based on the best available science should be utilized for any activities with the potential to impact pinyon jays, particularly for pinyon-juniper removal projects: 88 Marzluff, J.M., & Balda, R.P. (1992). The Pinyon Jay: Behavioral Ecology of a Colonial and Cooperative Corvid. T & A D Poyser, London, p. 161. - Survey all areas where trees will be removed or habitat disturbance will occur, with surveys conducted during pinyon jay nesting season (generally February through May). Areas should be surveyed even if the tree removal or disturbance will take place outside the nesting season, as pinyon jays can have very high nest site fidelity and may use the same nesting sites across years. - To establish pinyon jay absence, three surveys should be conducted during the nesting season, with each survey separated by at least two weeks. - If pinyon jay nests are found, the breeding colony should be buffered by a 500 meter no-treatment/disturbance zone as recommended by the Conservation Strategy for the Pinyon Jay led by the U.S. Fish & Wildlife Service. <sup>89</sup> 89 Somershoe, S. G., E. Ammon, J. D. Boone, K. Johnson, M. Darr, C. Witt, and E. Duvuvuei. 2020. Conservation Strategy for the Pinyon Jay (Gymnorhinus cyanocephalus). Partners in Flight Western Working Group and U.S. Fish and Wildlife Service. We propose that these measures be incorporated as overarching guidance for management of pinyon jays on the Monument, and have categorized them in accordance with the goals, objectives, and management actions framework and included them in the Proposed Alternative Components section below.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Best available information-baseline data	In developing management prescriptions and consultation plans we encourage the Agency to review and incorporate the following documents: - Tribal comments received during Council on Environmental Quality consultations on the President's America the Beautiful Initiative September 27th - November 23rd, 2021, at <a href="http://www.whitehouse.gov/wp-content/uploads/2022/03/Atb-tribal-Consultation-Summary.pdf">www.whitehouse.gov/wp-content/uploads/2022/03/Atb-tribal-Consultation-Summary.pdf</a> - Memorandum of Understanding (MOU) regarding Interagency coordination and collaboration for the Protection of Indigenous Sacred Sites. - Tribal Treaty rights MOU and related to co-management of federal lands with Tribes and DOI. - Direction for implementing provisions of Joint Secretary's Order 3403 (SO 3403), Fulfilling the Trust Responsibility to Indian Tribes in the Stewardship of Federal Lands and Waters. BLM guidance (Permanent Instruction Memorandum 2022-011) - National Cultural Resources Procedures Handbook - Bears Ears Inter-tribal Coalition Collaborative Land Management Plan for Bears Ears National Monument, at <a href="https://www.bearssearscoalition.org/wp-content/uploads/2022/08/FINAL_BENM_LMP_08252022.pdf">https://www.bearssearscoalition.org/wp-content/uploads/2022/08/FINAL_BENM_LMP_08252022.pdf</a>	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Best available information-baseline data	It is our understanding that within the Monument utilization levels are currently set at 50-60% for most allotments. The best available science indicates that 30% utilization is ecologically superior to higher utilization levels (particularly in dryland ecosystems like the Monument), and also economically superior. <sup>64</sup> The level of utilization describes the total percent of annual plant herbage consumed or destroyed by herbivores. In their well-respected range management textbook, Holechek et al. (2001) describe utilization guidelines for different range types. <sup>65</sup> For those found in the Monument, the percent utilization of key species is 30-40%. The textbook continues that for ranges in good condition, these lands can withstand the higher utilization level. For lands in poor condition or grazed during the active growth period (March-July in the Monument), these should receive the lower utilization level. As cited earlier, the soil survey for this area found that the forage production is roughly 25% of what it would be at its potential. Holecheck et al. describe the range condition for lands producing at this production level as poor. <sup>66</sup> Therefore, the lower number of 30% utilization is recommended. 64 Holecheck, J.L., Gomez, H., Molinar, F., & Galt, D. (1999). Grazing Studies: What We've Learned. Rangelands 21(2), 12-16; Carter, J. (2013). Utilization, Rest and Grazing Systems - A Review. 1-10; DeLong, D. (2015). Summary Basis for Building Wildlife Habitat-Needs & Protection into Forage Utilization Limits. 1-8. 65 Holechek, J. Pieper, R, and Carlton, H. (2001). Range Management Principles and Practices. Fourth Edition. Table 8.8 p. 223. 66 Holechek et al. (2001), p. 185.	Appendix A - Figures & Tables.pdf
Woodward	Katie	N/A	Best available information-baseline data	Allan, James R., Hugh P. Possingham, Oscar Venter, Duan Biggs, and James E.M. Watson. "The Extraordinary Value of Wilderness Areas in the Anthropocene." Encyclopedia of the World's Biomes, 2020, 158-68. <a href="https://doi.org/10.1016/b978-0-12-409548-9.12427-3">https://doi.org/10.1016/b978-0-12-409548-9.12427-3</a> . Aycrigg, Jocelyn L., T. Ryan Mccarley, R. Travis Belote, and Sebastian Martinuzzi. "Wilderness Areas in a Changing Landscape: Changes in Land Use, Land Cover, and Climate." Ecological Applications 32, no. 1 (October 8, 2021). <a href="https://doi.org/10.1002/eap.2471">https://doi.org/10.1002/eap.2471</a> . The National Landscape Conservation System 15 Year Strategy 2010-2025 § (n.d.). <a href="https://www.blm.gov/sites/default/files/documents/files/NLCS%20Strategy_0.pdf">https://www.blm.gov/sites/default/files/documents/files/NLCS%20Strategy_0.pdf</a> . Record of Decision and Approved Resource Management Plans for the Grand Staircase-Escalante National Monument § (2022). <a href="https://eplanning.blm.gov/public_projects/lup/94706/20012470/250017029/GSENM_ROD_and_ARMPs_February2020.pdf">https://eplanning.blm.gov/public_projects/lup/94706/20012470/250017029/GSENM_ROD_and_ARMPs_February2020.pdf</a> . Soulé, Michael E., Brendan G. Mackey, Harry F. Recher, Jann E. Williams, John C. Woinarski, Don Driscoll, William C. Dennison, and Menna E. Jones. "The Role of Connectivity in Australian Conservation." Connectivity Conservation, 2006, 649-75. <a href="https://doi.org/10.1017/cbo9780511754821.028">https://doi.org/10.1017/cbo9780511754821.028</a> . Switalski, Adam. "Off-Highway Vehicle Recreation in Drylands: A Literature Review and Recommendations for Best Management Practices." Journal of Outdoor Recreation and Tourism 21 (March 2018): 87-96. <a href="https://doi.org/10.1016/j.jort.2018.01.001">https://doi.org/10.1016/j.jort.2018.01.001</a> . Watson, James E.M., Danielle F. Shanahan, Moreno Di Marco, James Allan, William F. Laurance, Eric W. Sanderson, Brendan Mackey, and Oscar Venter. "Catastrophic Declines in Wilderness Areas Undermine Global Environment Targets." Current Biology 26, no. 21 (November 2016): 2929-34. <a href="https://doi.org/10.1016/j.cub.2016.08.049">https://doi.org/10.1016/j.cub.2016.08.049</a> .	Woodward_GSENMcomment.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Berry	Scott	N/A	Best available information-baseline data	i.Establishment of a panel of professional economists tasked to analyze the economic impacts of GSENM policies and decisions through the use of objective economic data within two years. Ensure that analysis employs a multiscalar approach, reviewing economic factors at local, regional and national levels. ii.Revisit and re-evaluate the adoption of the IMPLAN economic model. This model was first developed by the Forest Service in the mid-1970's, well before the development of modeling tools that include measures for environmental values and ecosystem services. Consider and present economic evaluations produced by alternative, contemporary models of economic development and growth, including an explicit description of the assumptions adopted in IMPLAN models. iii.Develop and publish models explaining in detail how non-market values, both use and nonuse, are determined and employed in GSENM planning processes. Ensure that changes in property values in gateway communities and counties are included in the models chosen. iv.Establishment of an on-line economic data library available to management and the public to be used to evaluate claims of disparate economic impact within two years. v.The creation of a permanent staff position for a professional economist at GSENM for the purpose of providing reliable economic analysis to management within one year. c. Monitoring Standards; i.Have qualified volunteer economists been included in the professional panel of economists? ii.A requirement that annual reports be prepared and published describing progress on the establishment of the economic data library. iii.Has a staff position for a professional economist been created and funded?	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Not Provided	Remove the GSENM cattle	N/A	Best available information-baseline data	The three attachments provide detailed information on the climate change and other harms caused by cattle grazing. BLM should use this information in preparing the draft GSENM RMP and associated NEPA analysis.	Climate & livestock on public lands_Beschta et al_2013.pdf
Eaton	Marietta	N/A	Best available information-baseline data	A multitude of books and articles, based on science conducted on the monument exist and contain valuable information for the current effort (e.g., Pam Foti, Recreation, NAU; Olivia Carril, Bees, USU). How will available scientific data (funded by BLM and others) be applied to management? SCIENCE	GSENM NOI Response.docx
J	A	N/A	Best available information-baseline data	RESTORATION: Restoration methodology should be dictated by the best available science and site-specific conditions and language in this plan should indicate as such.	GSENM_20220923.pdf
Berry	Scott	N/A	Best available information-baseline data	Science Mission . Clarify what the science mission at GSENM entails, emphasizing the adoption of the scientific method as the guiding principle and spirit for all management decision processes. Components of the NLCS, including GSENM, are obligated to integrate scientific methods into decision making processes. In its simplest form, the scientific method has four elements;first, a good question is developed, one with the potential to contribute to a better understanding of the subject being explored; second, a good tentative explanation is formulated, a potential answer to the question posed, including terms that match the underlying observations; third, the tentative explanation is criticized and challenged; and fourth, the tentative explanation is modified or abandoned as needed to better conform to existing or new observations. The RMP should clarify that this approach to solution finding will be given the widest possible application in management decision making.	RAD Management (2).pdf
Eaton	Marietta	N/A	Best available information-baseline data	Since 1996 the Southern Utah Oral History Project, in partnership with the Utah Division of State History, collected over 220 oral histories available through the Southern Utah University Special Collections Library. This program was initiated very soon after the first designation, to honor local community members and better understand and document their place on this landscape. This project continued until only recently is a valuable resource on a multitude of projects, that remains currently unfunded.	GSENM NOI Response.docx
Berry	Scott	N/A	Best available information-baseline data	The AMS includes a suite of questions about how science should be used at GSENM. (AMS 6-6).	RAD Management (2).pdf
Berry	Scott	N/A	Best available information-baseline data	With respect to measuring and predicting potential impacts to these values, the BLM should adopt an approach that requires two initial steps; first, the proponent must provide a high quality scientific analysis of potential impacts to these values, and second, the proponent shall be required to demonstrate that its proposal incorporates the best available techniques for minimizing anticipated impacts.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Not Provided	Cattle don't belong in GSENM	N/A	Best available information-baseline data	This GSENM planning process must address the considerable harm that continued cattle grazing has on monument objects and values. There is abundant science demonstrating how such grazing causes adverse impacts on wildlife, water quality, soils, and various upland and riparian habitats. This grazing also destroys cryptobiotic soils, helps cheatgrass expand, and removes growing vegetation that would otherwise sequester atmospheric carbon. Please carefully review the three related attachments. The attachment relating to the BLM San Pedro River NCA is relevant because the upland grazing in the GSENM is likely having similar impacts on species richness and the expansion of pinyon-juniper instead of mesquite. The information in these attachments should be used in preparing the DEIS.	Climate Change and Livestock Use on Public Lands 2022.pdf
Not Provided	I care about the GSENM	N/A	Best available information-baseline data	The new GSENM RMP NEPA analysis should apply the best available conservation biology and landscape ecology information and methodology. The evaluation of potential impacts from proposed actions on monument objects and values, as well as other resources, should be done at both local and landscape contexts. This is very important to ensure an objective and comprehensive analysis.	N/A
Allison	Robert	N/A	Best available information-baseline data	GSENM is characterized by tensions between grazing stakeholders and conservation stakeholders who argue that a reduction in grazing is necessary to reduce environmental impact and maximize the maintenance of natural processes in the monument. The tensions created by increased recreational use is of concern to both grazing and conservation stakeholders.	N/A
Haran	Adiyan	N/A	Best available information-baseline data	There are many resources in the GSENM. I am including a URL to my website which has cataloged over 2300 reasons why the GSENM should be preserved and protected in its current state. www.archesoftheescalante.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Best available information-baseline data	Science: The science mission of GSENM should benefit local Navajo communities by recruiting and retaining Navajo scientists and involving other tribal members in all aspects of the work. Researchers should be encouraged to develop projects that are relevant and responsive to Navajo issues and concerns. Among these, study of grazing impacts related to cultural resources, native plants, water sources, soils, and greenhouse gasses should be prioritized. The science should be presented and shared in local chapter houses and with tribal leaders to inform tribal land management practices. With the inclusion of tribal members in scientific projects, TEK principles and indigenous epistemologies and methods should also be supported in the RMP.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Best available information-baseline data	Expand the use of volunteers, particularly in data collection and scientific studies -We recommend that language should include specific language that results of scientific analysis be shared with the schools, the local newspapers, and that any specimens be retained in GSENM. That all copyrighted material resulting from scientific discoveries on GSENM be written in the name of the County in which it is retrieved, not in an individual name.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Jackson	Thomas and Marilyn	Star Ranch LLC	Best available information-baseline data	We recommend that Baseline assessment be a true 'baseline' when BLM was established December 10, 1946 or 1996 when GSENM was established. To safeguard the public and provide food, we recommend that there be no populations of predators greater than these, and that figures for domestic cattle be reinstated, with all other populations in relative figures. This would mean transplanting-the now greater population --species back where they came from to keep them from competing with cattle grazing! This would mean repairing and building back roads. This would mean diminishing the size of government presence and opening back grazing allotments to cattlemen, etc. However, this would mean that tourists receive some vital information and training before heading out into unfamiliar lands.	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Best available information-baseline data	DWR has partnered with the Utah State University (USU) on researching Utah's native plants and insects to help prevent listings under the federal Endangered Species Act, support delisting when possible, and to make informed wildlife management decisions. The native plant and rare insect conservation project leaders can be available to help establish best management practices for native bees, butterflies, insects and plants that rely on the habitat within the Monument.	GSENM RMP Scoping Comments 27SEPT2022.pdf
McCoy	Melissa	U.S. EPA Region 8	Best available information-baseline data	We recommend the Draft EIS present impacts to resources as a comparison to the existing conditions baseline using consistent methods of measuring project impacts for all alternatives. We also recommend that BLM consider the following when defining baseline conditions: - Verify that historical data (e.g., data five years or older) are representative of current conditions. - Include resources directly impacted by the project footprint, as well as the resources indirectly (or secondarily) impacted by the project (40 CFR § 1508.1(g)(1)).	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
McCoy	Melissa	U.S. EPA Region 8	Best available information-baseline data	When evaluating effects, we recommend using existing environmental conditions as the baseline for comparing impacts across all alternatives, including the no action alternative. This provides an important frame of reference for quantifying and/or characterizing magnitudes of effects and understanding each alternative's potential impacts and benefits. By utilizing existing environmental conditions as a baseline, future changes to environmental resources can also be more accurately measured for all alternatives, including the no action alternative. This is particularly important when there are environmental protections in place that are based on current conditions, such as total maximum daily loads (TMDLs) for impaired creek segments.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Campbell	Todd	University of Tampa	Best available information-baseline data	Grazing cattle can heavily affect the water quality in the rivers due to a number of different reasons. The use of fertilizers to benefit the grass and vegetation eaten by livestock is one good example. Fertilizers contain many different elements, including nitrogen, that after rainfall can make its way into the river. These different elements feed things like algae which if left untreated can cause algal blooms (mass amount of algae) that kills off aquatic plants by blocking sunlight from reaching them. No plants would mean less food for any organisms living in the river and ultimately causing a huge loss of population. Yet also these loss of plants means there are less flora to naturally treat the water. There are also other things like the use of pesticides and the construction of grazing areas that can affect the living environment of the native fish such as the Speckled dace, and Colorado River cutthroat trout.	N/A
Walker	Joro	Western Resource Advocates (WRA)	Best available information-baseline data	Figure 2 further demonstrates that the Monument contains lands high in community diversity, particularly in the southern portion of Grand Staircase-Escalante - diversity that is necessary to protect and sustain Monument wildlife and plant objects. Thus, the CSP report establishes that essential ecosystem values are found throughout the Monument that are necessary to maintaining Monument Objects and biological resources such as the diversity and richness of the areas wildlife and plant communities, as well as the area's precious water resources and ecological intactness. To illustrate the biodiversity objects of the Monument, CSP portrays the richness of rare and endemic species weighted by their rarity (Figure 4), ecological system or vegetation diversity, and the distribution and overlap of the ranges of wildlife species (Figure 3) and bird species across the Monument. For each of these objects, the maps show particularly high biodiversity values in the northwest portion and high values in the southern portion of the Monument. CSP also maps areas of high diversity of endemic plant species (Figure 5) and significant areas with high bird species diversity. Figure 6. Through exhaustive and careful mapping and analysis, CSP's report and maps demonstrate that the ecological objects and values, including ecological intactness that the 1996 Monument was created to safeguard are found across the Monument. The maps elucidate that the proper care of Monument Objects and values depend upon management that maintains the ecological intactness and remoteness and the protection of the natural processes and unaltered condition of the Monument. Any fragmentation of the Monument or isolation of its sensitive and vital objects will expose Monument Objects to damage and destruction. To meet its legal obligations, then, BLM must avoid alteration of the natural landscapes and natural processes. The Monument harbors numerous ecologically- and scientifically-significant objects, including the ecological intactness that sustains these objects. The CSP maps illustrate the interconnectedness of these objects and values and underscore why safeguarding ecological intactness and the wildlife and plant communities that depend on it must be achieved on a landscape level. In the end, the protection of the Monument Objects and Congressionally identified values requires management that prohibits fragmentation or isolation of Monument Objects and that preserves ecological intactness.	wra gsenm rmp scoping 9 18 2022.pdf
Walker	Joro	Western Resource Advocates (WRA)	Best available information-baseline data	To demonstrate the value of ecological intactness throughout the Monument and to show why and how ecological intactness must be protected, Conservation Science Partners ("CSP")5 mapped and analyzed the distribution and diversity of ecological objects identified for conservation in Proclamation 6920. Meredith L. McClure & Brett G. Dickson, Mapping the distribution and diversity of ecological objects identified in the 1996 Grand Staircase-Escalante National Monument Proclamation, (May 21, 2018) ("CSP Report"), attached as Exhibit "I." While this report was prepared to compare various Monument Objects contained within the 1998 boundaries of the Monument to those contained in the areas that were purportedly excluded from the Monument by the 2017 Trump Proclamation, the study remains highly instructive. The study shows that ecological intactness and the biological and ecological values that depend on intactness are found throughout the Monument. As a result, BLM's management obligation to protect intactness and other ecological Monument Objects must span the entire Grand Staircase-Escalante and indeed, must ensure that activities outside the Monument do not interfere with the protection of those objects. 5 Conservation Science Partners (CSP) is a nonprofit organization which specializes in geospatial and remote sensing analysis. CSP works with an interdisciplinary, global network of experts to bring critical, multi-dimensional ideas to solve conservation problems.	wra gsenm rmp scoping 9 18 2022.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Murray	Michael B.	Coalition to Protect America's National Parks	Air quality	<p>Air Quality Both Bryce Canyon and Capitol Reef have been designated as mandatory Class I areas under the Clean Air Act. 42 U.S.C. § 7472; 40 C.F.R. § 81.430.12 Class I areas are places where the law requires the air quality to be at its most pristine, virtually unaffected by human-made or human-caused pollutants. Congress "declare[d] as a national goal the prevention of any future, and the remedying of any existing, impairment of visibility in mandatory class I Federal areas which impairment results from manmade air pollution." 42 U.S.C. § 7491(a)(1).13 Glen Canyon is a Class II area for air pollutants.14 Class II areas, like Class I, are established to prevent any significant deterioration of the air quality standards set by the Clean Air Act but allow a moderate increase in certain air pollutants. Visitors to National Parks and wilderness areas consistently rate visibility and clear scenic vistas as one of the most important aspects of the experience. 15 Bryce Canyon's Foundation Document explains that the"[c]lean, clear air in Bryce Canyon National Park is essential to the exceptional views of the colorful Claron Formation and panoramic vistas of the surrounding region," which include hundred-mile views of dramatic landscapes. 16 Capitol Reef's Management Plan likewise emphasizes the importance of air quality, which is "usually very good"; the park's clear air allows "[v]isibility from points within and around the park [that] usually exceeds 100 miles." Capitol Reef Gen. Mgmt. Plan at 81-82, 109. Clean air enhances the color and contrast of landscape features; allows visitors to see great distances; and safeguards ecosystem, visitor, and public health. Haze-causing pollutants would obscure scenic vistas in adjacent national parks by impairing a viewer's ability to see long distances, color and geologic formation. They also contribute to unhealthy National Ambient Air Quality Standard pollutants, ozone and particulate matter. 12 In 1977, Congress amended the Clean Air Act to deem all "national parks which exceed six thousand acres in size" to be mandatory Class I areas (i.e., areas that "may not be redesignated"). 42 U.S.C. § 7472(a)(4). Both Bryce Canyon and Capitol Reef were greater than 6,000 acres and were therefore designated as class I areas under this statute. Congress also instructed the Administrator of the Environmental Protection Agency ("EPA"), after consulting with the Secretary of the Interior, to "promulgate a list of mandatory Class I Federal areas in which he determines visibility is an important value." 42 U.S.C. § 7491(a)(2). Bryce Canyon and Capitol Reef are both among the Class I areas in which the Administrator determined that "visibility is an important value." 40 C.F.R. § 81.430 (adopted at 44 Fed. Reg. 69,122, 69,126 (Nov. 30, 1979)). 13 NPS has a statutorily-mandated "affirmative responsibility to protect the air quality related values (including visibility) of any such lands within a class I area" that NPS manages, "and to consider, in consultation with the Administrator [of the EPA], whether a proposed major emitting facility will have an adverse impact on such values . . . ." 42 U.S.C. § 7475(d)(2)(B). 14 See Glen Canyon National Recreation Area Off-Road Vehicle Management Plan / Final Environmental Impact Statement at 18 (Jan. 2017). 15 Clean Air Task Force, Out of Sight: Haze in our National Parks at 1 (Sept. 2000). 16 Bryce Canyon, Foundation Document ("Bryce Canyon Foundation Document") at 11 (May 2014). In addition, preservation of the fragile geological features such as those found in Bryce, Capitol Reef and Glen Canyon, depends in part on clean air, without acidic chemicals that can erode the fragile formations. Id. at 19..</p>	NPCA & Coalition GSE RMP scoping FINAL.pdf
Jackson	Thomas and Marilyn	Star Ranch LLC	Air quality	<p>In accordance with the Clean Air Act we recommend that all Transmission stations and lines for electrical power and telephone should be grandfathered in. Wind farms, solar farms, nuclear energy, coal-fired plants, hydro power should be coordinated to insure an ample supply of electric power for the future. Diversifying types of energy development would insure that carbon emissions remain low. We remind the reader that burning slash near sawmills was a regular occurrence, and smoke from 'intentional burning' should be allowed as a Number 2 Air quality of Yellow with the standard of Moderate or index of 51 to 100 according to AirNow.gov. The small amount of smoke emitted from the Navajo Power Plant did not interrupt growth for over a hundred years, and is far less than the smoke which occurs from lightning caused fires in the Burning Hills of Canaan Mountain. One forest fire in the Western US puts more pollution in the air, and destroys more animals and habitat, than previous levels created by sawmills or Navajo coal-fired power plant.</p>	N/A
McCoy	Melissa	U.S. EPA Region 8	Air quality	<p>Defining the current air quality baseline conditions will be an important component of this Draft EIS in order to assess whether BLM-authorized activities have potential regulatory or human health significance. The planning area includes or is near Clean Air Act (CAA) Class I Areas (e.g., Bryce and Capitol Reef National Parks) and Sensitive Class II areas. Class I Areas are certain large national parks and wilderness areas that the CAA provides with special protection for air quality and air quality-related values (AQRVs), including visibility and areas sensitive to deposition. Sensitive Class II Areas are areas for which Federal Land Managers have identified air quality and/or AQRVs as valued resources. EPA recommends the Draft EIS provide an evaluation of the current air quality conditions and trends in the planning area as well as the potential direct, indirect, and cumulative impacts from future BLM-authorized activities. We recommend that such an evaluation include the following: - Each of the criteria pollutants and their appropriate National Ambient Air Quality Standards (NAAQS), i.e., ozone, particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide and lead. - AQRVs in potentially impacted Class I areas and sensitive Class II areas. - Prevention of Significant Deterioration increment at potentially impacted Class I and Sensitive Class II Areas. - Estimated greenhouse gas emissions caused by the alternatives. EPA recommends the Draft EIS consider and disclose the potential environmental effects of land management actions such as prescribed burns and on and off-road motorized vehicle use on air quality in the planning area and evaluate whether there is a need to revise management actions or develop stipulations to minimize the potential air quality impacts. We note the 2017 Emissions Inventory in the AMS indicates on and off-road sources as well as wildfires are some of the greatest contributors of emissions in Kane and Garfield Counties. The Draft EIS should identify any mitigation measures (including control measures and design features) that would apply in the event that potential adverse impacts to air quality or AQRVs are predicted. These measures could include BMPs, dust suppression measures for unpaved roads and construction areas, limitations on OHV use, add-on control technologies, limitations on the density and/or pace of development, and smoke management plans. EPA also recommends BLM identify the mechanisms it will use to ensure implementation of these measures. We note that Presidential Proclamation 10286 withdrew lands within GSENM from mineral location and entry, however according to the AMS, there are a number of existing oil and gas leases that have been suspended, a pending tar sands lease application, and several cobalt and alabaster mining claims that were staked when the boundaries of GSENM were diminished by Presidential Proclamation 9682. If these leases or mines are developed, we recommend establishing specific lease stipulations and other protective measures to be applied and that BLM convene the Air Technical Workgroup to discuss the appropriate level of air quality impact analysis.</p>	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Walker	Joro	Western Resource Advocates (WRA)	Air quality	<p>Because the agency is ultimately charged with safeguarding Monument Objects and values, including those sensitive to air pollution, the agency's management must avoid emissions of air pollutants, visibility degradation, atmospheric deposition and other air quality impacts associated with vehicle travel, including off-road activity, livestock grazing, and other surface disturbing activities.</p>	wra gsenm rmp scoping 9 18 2022.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Walker	Joro	Western Resource Advocates (WRA)	Air quality	BLM has significant legal obligations relative to air quality, including the agency's duties under the Antiquities Act, Proclamations 6920 and 10286, the 1998 Land Exchange Act, 54 U.S.C. § 100101(a) and 16 U.S.C. § 460dd-3. Specifically, Proclamations 6920 and 10286 identify at least three core Monument Objects sensitive to air pollution: visibility or scenic values; plant communities; and, water resources, including water quality. Along with water resources and plants, scenic values, and therefore good visibility, are fundamental Monument Objects. Good air quality is also necessary to protect the health of Monument visitors and wildlife. Therefore, BLM must ensure that air quality in the Monument is maintained and improved sufficient to safeguard visibility, plant communities and water resources, as well as public health and wildlife species.	wra gsenm rmp scoping 9 18 2022.pdf
Walker	Joro	Western Resource Advocates (WRA)	Air quality	For example, fugitive dust contributes to concentrations of both PM2.5 and PM10. PM2.5 and PM10 adversely impact public health, the environment and plants. E.g. 62 Fed. Reg. 38652 (July 18, 1997); 71 Fed. Reg. 61144 (Oct 17, 2006). While BLM should consider the cumulative impacts of natural and anthropogenic sources of fugitive emissions on Monument Objects, its focus should be on reducing and eliminating emissions from travel on unpaved roads, illegal ORV use and wind erosion of disturbed areas and on minimizing and restoring surface disturbances, particularly where soils are prone to wind erosion. To derive an appropriate management scenario for the Monument, BLM must ensure up-to-date emission factors and estimation methodologies are applied for each dust emission source category and all fugitive dust emissions estimates reflect the latest revisions to the PM2.5 and PM10 ratios.	wra gsenm rmp scoping 9 18 2022.pdf
Walker	Joro	Western Resource Advocates (WRA)	Air quality	Similarly, BLM must also consider the consequences of nitrogen and sulfur deposition on water quality, soils, animals and plants. The adverse impacts of atmospheric nitrogen and sulfur deposition are well documented. For example, the National Park Service explains: Atmospheric nitrogen and sulfur deposition can lead to changes in water chemistry (acidification). This effects water plants and animals ranging from diatoms and insects, to amphibians and fish. Deposition can also cause chemical changes in soils that alter microorganisms, plants, and trees. <sup>9 9</sup> <a href="https://www.nps.gov/subjects/air/nature-nitrogensulfur.htm">https://www.nps.gov/subjects/air/nature-nitrogensulfur.htm</a>	wra gsenm rmp scoping 9 18 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Climate change	The agency should adequately consider that motorized recreation is not a significant contributing factor to purported climate change.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Popejoy	Mike	Grand Canyon Trust	Climate change	Climate Change Climate change and other widespread environmental influences are affecting the biological communities of BLM-managed land throughout the West. In fact, the Southwest, including the Colorado Plateau, is considered to be one of the most "climate-challenged" landscapes in the nation; through the 21st century, the Colorado Plateau is projected to sustain hotter temperatures, increased aridity and precipitation variability, and more severe droughts. <sup>99</sup> 100 Projected climate change will interact with existing land uses, and each species and ecosystem will respond in unique ways. The extent, timing, and interactions of regional climate impacts are complex and not fully understood (Stevens et al. 2020). <sup>101</sup> This complexity presents a challenge for those who are working to reduce climate change impacts and to support the ability of species and ecosystems to adapt to change; thus, taking action based on proactive planning can promote landscape resilience and reduce the impacts from climate change. Resilience and resistance are the key qualities central to the ability of natural systems to maintain ecological integrity against climate driven stressors and their ability to recover a normal range of function after being disturbed by them. <sup>99</sup> Cook B.I., T.R. Ault TR. and J.E. Smerdon. 2015. Unprecedented 21st century drought risk in the American Southwest and Central Plains. Science Advances 1:e1400082. <sup>100</sup> Udall, B. and J. Overpeck. 2017. The twenty-first century Colorado River hot drought and implications for the future. Water Resources Research, 53(3), pp.2404-2418. <sup>101</sup> Stevens L.E, J. Jenness and J.D. Ledbetter. 2020. Springs and springs-dependent taxa in the Colorado River Basin, southwestern North America: geography, ecology, and human impacts. Water 12, 1501; doi:10.3390/w12051501.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Climate change	Climate-induced changes in environmental conditions will complicate the process of setting management objectives in GSENM by altering resource processes and dynamics in unpredictable ways. <sup>103</sup> , <sup>104</sup> The uncertainties surrounding climate change underscore the importance of maintaining the capacity to adjust resource objectives and to learn quickly as climate patterns are revealed over time. Potential GSENM management actions in response to climate change range widely, from more concerted protection of riparian corridors, springs, and seeps for species needing those climate refugia, to careful coordination with adjacent national forests to ensure that species that need to gradually move upwards in elevation have that option. Management strategies can be designed to respond to changeable climatic conditions as well as changeable resource states. For example, a particular strategy for climate adaptation or mitigation might be designed specifically for one particular climate change scenario, but not for others. <sup>103</sup> Williams, J.W. and S.T. Jackson. 2007. Novel climates, no-analog communities, and ecological surprises. Frontiers in Ecology 5:475-482. <sup>104</sup> Knutson, M.G. and P.J. Heglund. 2011. Resource managers rise to the challenge of climate change. In J.L. Belant and E. Beaver (eds.). Ecological Consequences of Climate Change: Mechanisms, Conservation, and Management. New York: Taylor and Francis.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Climate change	Managers need to understand the effects of climate change, drought, and livestock grazing on these rare plants and their associated habitats. As the climate warms and dries, the habitat of rare plant species may become unsuitable, and populations may not be able to adapt or migrate to new areas. Managers must identify and carefully protect alternative habitat locations. For example, protecting riparian corridors that span elevation ranges may anticipate future habitat needs for riparian-dependent species.	Appendix B - RNA Proposals.pdf
J	A	N/A	Climate change	CLIMATE CHANGE: I want this plan to address climate change. GSENM should use this resource plan as an opportunity to consider new proposals consistent with protecting Monument objects, such as designation of new areas of critical conservation concern, adopting a sustainable approach to grazing, or developing adaptive approaches to climate change. Demonstrate a robust understanding of managing for climate change resiliency and overall biodiversity.	GSENM_20220923.docx
Berry	Scott	N/A	Climate change	CLIMATE CHANGE; a. Goals; i. Incorporate current high quality climate science into the all decision making processes and operations at GSENM as the best way to accomplish the protection and conservation purpose expressed in Proclamation 10286	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Berry	Scott	N/A	Climate change	It should be assumed that accelerating climate change will impact future changes in forage availability and rangeland capability. Using high quality science, the RMP should analyze and quantify these anticipated changes as a threshold question with respect to rangeland health and grazing management.	RAD Management (2).pdf



Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Spotts	Richard	N/A	Climate change	There are many published scientific studies on the adverse impacts caused by cattle grazing. One is attached relating to grazing and climate change impacts. I hereby wish to incorporate this attachment by reference in my scoping comments. This information should be carefully considered as BLM moves forward with this planning. The climate and extinction crises are real, connected, worsening, and demand bold and innovative solutions. Status quo management and attitudes are no longer appropriate or sustainable. BLM must face the reality that environmental conditions are changing rapidly and management must evolve to properly respond to those changes.	N/A
Hartman	Bob	N/A	Climate change	The BLM should submit a study on the effects of climate change as it affects the management plan.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Climate change	Climate Change: There are many similarities between the lands of GSENM and the Navajo Nation, so the tribe may benefit from climate change science and partnerships initiated by the RMP. Climate change studies and programs should include its effects on cultural sites, springs, rangelands, and vegetation.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Climate change	How can a million recreationists leave less of a carbon footprint than 41,000 cows?	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Climate change	I. Climate Change On September 15, 2022, the BLM hosted its second Cooperating Agency Meeting, in the form of an all-day workshop at the BLM Paria River District Headquarters in Kanab, UT. At this meeting, a representative of the BLM indicated that as part of the BLM's climate change strategy moving forward, the BLM would focus less on maintaining native ecotypes during any form of reclamation or rangeland project, and instead focus on implementing ecotypes that are sustainable and resilient in a changing environment/climate. This strategy is in line with the State's recommendation analyzed herein under Section 10 (Noxious Weeds and Invasion Nonnative Plants) wherein the State recommends that as part of rangeland health improvements that the BLM should consider the use of desirable non-native species alongside native species during the reseeding process to improve forage resiliency, prevent erosion, and combat invasive species establishment.(23) Such a strategy may allow for the introduction of grass and forb types that may be able to compete with the abundant and invasive "cheatgrass" that has begun to dominant many western rangelands in recent history. (23) Bybee, J., Roundy, R. A., Young, K. R., Hulet, A., Round, D. B., Crook, L., Aanderud, Z Z., Eggett, D. L., Cline, N. L. 2016. Vegetation Response to Pinon and Juniper Tree Shredding. Rangeland Ecology and Management 69: 224-234.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Climate change	Further, the BLM should analyze the continued use of livestock grazing for carbon sequestration purposes. Generally speaking, agricultural production, especially livestock grazing, is often falsely viewed in a negative way when discussing climate change.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Climate change	In addition to the large economic role livestock grazing plays in the State (analyzed hereunder) livestock grazing has high-potential to contribute to carbon sequestration through properly grazed landscapes. Grazing systems are used to control the time, timing, and intensity of grazing which results in the health of the rangeland and stores carbon. Grazed landscapes result in higher amounts of carbon being stored in the soil than ungrazed landscapes. Livestock grazing contributes to removing large amounts of carbon each year by grazed landscapes being able to use photosynthesis to store carbon in the soil and green plants. The removal of noxious and invasive weeds also contributes to landscapes being able to store more carbon. Livestock grazing is an effective management tool used to remove noxious and invasive weeds. Utilizing livestock grazing as a management tool is also significantly less expensive than other management options. Ultimately, using livestock grazing as a tool for carbon sequestration will benefit rural economies and communities, and should be included in terms of scope of the analysis of climate change on the GSENM.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Snyder	Shannon	U.S. EPA Region 8	Climate change	EPA recommends the Draft EIS include a discussion of reasonably foreseeable climate change impacts in the planning area-such as changes in precipitation patterns, hydrology, vegetation distribution in respective watersheds, and temperature-and the potential effect of these impacts on objects and resources in the Monument. This could help inform the development of measures to improve the resilience of the RMP. Climate considerations in the Draft EIS should include how the shifting baseline of climate may need to be considered with regard to the resilience of the alternatives, and the potential to influence the significance of impacts in various resource areas over time. This is consistent with the 2020 NEPA regulations as updated by the NEPA Phase I Final Rule (April 2022). We recommend utilizing this information to develop BMPs, monitoring, and mitigation to protect Monument objects and resources. Additionally, we encourage BLM to use the CEQ Final Guidance for Federal Departments and Agencies on the Consideration of Greenhouse Gas (GHG) Emissions and the Effects of Climate Change in NEPA Reviews (August 1, 2016) in its analysis of the GHG emissions and climate impacts on the planning area. This guidance provides a reasonable approach for analysis of GHG emissions, opportunities to reduce those emissions, climate impacts on the planning area, and climate change adaptation strategies. Consistent with Executive Order 14008, Tackling the Climate Crisis at Home and Abroad, January 27, 2021, we encourage BLM to include management actions to provide for diverse, healthy ecosystems that are resilient to climate stressors; require effective mitigation and encourage voluntary mitigation to offset the adverse impacts of projects or actions; reduce greenhouse gas emissions from authorized activities to the lowest practical levels; identify and protect areas of potential climate refugia; reduce barriers to plant migration; use pollinator-friendly plant species in restoration and revegetation projects; and design facilities to mitigate potential structural impacts associated with extreme weather events. We also recommend discussing actions to improve the Monument's ability to adapt to changing environmental conditions, such as selecting resilient native species for replanting. This should anticipate the effects rising temperatures may have on soil moisture levels, seeds/seedlings growth, the vulnerability of specific species under projected climate conditions in the short and longer term, and any anticipated shift of forest species to more suitable range elevations. Lastly, as BLM considers the wilderness evaluation process and ACEC designations, we recommend considering whether conservation commitments are needed to achieve the goal in Section 216 of E.O. 14008, of conserving 30 percent of the nation's lands and waters by 2030.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Campbell	Todd	University of Tampa	Climate change	Climate Change plays a big part throughout the GSENM due to the high temperature and droughts during the year. The average rainfall over the national monument is about 6-25 inches (varies with height and area) every year (GSENM 2022). While the precipitation is minimal, some areas with higher elevation do get snow fall. This then melts and carries lots of rocks and dirt down the watershed, which erodes some of the landscape. Depending on the time of year, rainfall floods the dry landscape and causes major flooding. This in turn, destroys the surrounding landscape. Wildfires can be a big problem during the non-rainy seasons in the area due to high temperatures, low humidity rates, and an overall arid environment. Many plants, grasses and brush can easily catch on fire and spread through the national monument.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Goreham	Dennis	Wasatch Mountain Club	Climate change	Climate Change: This is already an arid area. With climate change some plant and animal life may be at even greater risk. The RMP and EIS must address this. For example, more needs to be done to preserve existing water resources and riparian areas. There are areas showing degradation due to the recent presence of cattle as well as human foot travel.	GSENM WMC comment 09182022.doc
Pollock	Leland	Garfield County Commission	Climate Change	With its low population and broad landscapes, Garfield County recognizes that any actions would have an extremely minor if any significant impact to climate. In the September 15, 2022 cooperating agency meeting, a representative from the BLM mentioned that the Monument would be focusing less on native vegetation and focusing more on resilient plant communities whether they be native or non-native. We find this to be consistent with our resource management plan which states that native or non-native vegetation be used for conservation of targeted resources. With the severe drought in these past years, we recommend the Monument actively use vegetation that is resilient in drier climates. Historically, we have not seen many vegetation treatments on the monument. We recommend the monument take a more active role in vegetation management to address the drought issue.	Garfield County Commission.pdf
Sorenson	Craig	N/A	Cultural resource management, native American religious concerns, and tribal use	- Cultural resources and traditional sites and uses are the heritage to Native American cultures. The 2021 Proclamation recognizes the importance of involving Tribal Nations in the planning process and resource management decisions for their heritage sites including archeological sites, gathering places, springs and more. I respect their standing here.	GSENM Management Plan Comments.pdf
J	A	N/A	Cultural resource management, native American religious concerns, and tribal use	CULTURAL: No pack animals in relict plant communities and archeological sites. Include explicit language about cultural resource monitoring. I would like to see funding and staff to properly monitor sites on a defined basis.	GSENM_20220923.docx
Cox	Steven	N/A	Cultural resource management, native American religious concerns, and tribal use	There are innumerable objects and sites of historic and scientific interest. Many of the historical sites are sacred to the Tribal nations.	Comments on the Management Plan for the Grand Staircase Escalante National Monument.docx
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Cultural resource management, native American religious concerns, and tribal use	5. History, Historical Resources, and Sense of Place On September 15, 2022, the BLM hosted its second Cooperating Agency Meeting, in the form of an all-day workshop at the BLM Paria River District Headquarters in Kanab, UT. At this meeting a County Commissioner from Garfield County raised a good point that not only should tribal and ancient histories be safeguarded, but so should more recent histories as well. Meaning, more particularly, places with religious and historical significance to early Pioneers (such as Dance Hall Rock or Hole-in-the-Rock) should also be analyzed with an eye towards allowing continued religious use of those sites.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Pollock	Leland	Garfield County Commission	Cultural resource management, native American religious concerns, and tribal use	As described in the AMS, GSENM has been used by prehistoric and historic communities for multiple uses. We recognize that the GSENM has cultural resources that have potential public and scientific uses. These include sites, items, and areas that may be important to a group of people, the public in general or the scientific community. We support the inventory of these cultural resources. We discourage any management decisions based solely on speculation or modeling with little or no field verification.	Garfield County Commission.pdf
Pollock	Leland	Garfield County Commission	Cultural resource management, native American religious concerns, and tribal use	In addition to cultural, social, and scientific value, we recognize that some cultural resources items do have monetary value. Garfield County's resource management plan recognizes that these items are sometimes extracted, exported, and displayed without the County receiving any value in return. We recommend that increased facilities be developed in Garfield County for the study, interpretation, use, enjoyment, display, and curation of cultural resources.	Garfield County Commission.pdf
Meisenbach	Dan	Canyonlands Conservation District	Cultural resources	Livestock grazing within our monument public lands of Garfield and Kane counties is of cultural and historical significance. Many plans under the monument planning process have failed to evaluate the social, cultural, and historic impacts associated with livestock grazing.	N/A
Popejoy	Mike	Grand Canyon Trust	Cultural resources	Cultural Resource Inventories: It is our understanding that only between 5-7% of the GSENM has had cultural resource inventories conducted and these inventories have almost all been Section 106 inventories, <sup>72</sup> and that generally there is a lack of detailed information about the cultural resources within the Monument. The management plan should include provisions for completing additional cultural resource surveys in consultation with the Tribes. <sup>72</sup> Cultural resource inventory estimates of 5-7% as a result of Section 106 projects were provided verbally by prior Grand Staircase-Escalante National Monument Archaeologists Matt Zweifel and Doug McFadden.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Cultural resources	Ethnographies: Both the BLM and the Tribes with identified connections to this landscape have articulated a need for ethnographies. Ethnographies could provide critical information about how to best manage cultural resources and sacred sites within the Monument, and completion of ethnographies should be included as part of land management plans	Appendix A - Figures & Tables.pdf
Bauman	Sarah	Grand Staircase Escalante Partners	Cultural resources	Missing data for site consideration: The challenge in responding to the question about which sites should be considered, is the lack of data about the historic properties that exist within Grand Staircase-Escalante National Monument (GSENM). As we (GSEP) understand it (from conversations with BLM Archaeologists Matthew Zweifel and Doug McFadden), an estimated 5-7% of GSENM has been inventoried for culturally significant sites. In addition, almost all existing survey information is over 10 years old. Following the completion of a recent (2022) cultural resource inventory supported by GSEP and the BLM and conducted by the Museum of Northern Arizona (MNA) at Collet Top, it was discovered that the area surveyed had "an extremely high site density, even greater than what has been found in nearby survey blocks and greater than anticipated" (MNA). It was also reported that at least two sites had historic components. These survey results indicate a need to dedicate resources to develop a plan in partnership with the Tribes to complete Section 110 surveys throughout GSENM. Known Sites: Known sites that should be given extra attention during the planning process include all historic properties close to trails and roads that are vulnerable to impacts from human and animal disturbance. The determination about how to protect and manage culturally vital and sensitive properties should be done in consultation with the Tribes with known connections to GSENM.	Final GSEP NHPA Section 106 Consultation Comments, 9-27-22.pdf
Larsen	Hanna	N/A	Cultural resources	Cultural resources and traditional properties and uses should be protected and restored, including increased efforts to ensure Tribal Nations are proactively involved in the planning processes and resource management decisions.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Holland	Marsha	N/A	Cultural resources	Cultural Resources/Recreation/ Wildlife/Waterways/Hydrology: Vandalism to significant archaeological and historic sites, when reported gets a response of "we don't know what to do," no funding or staff. It has become practice and necessary for volunteers to mitigate these infractions. Thank goodness for willing volunteers. Cooperative agreements with organizations that provide volunteers for much needed boots on the ground mitigation seems reasonable. Encourage and develop local groups/stakeholders to do similar work with BLM guidance, through cooperative agreements. It is what you do when you have no money or staff, you get some MOUs signed. There are no trash receptacles, no one to empty those receptacles, little education except by volunteers or clear Pack it Out messaging (as seen in other states' Monument areas), human waste in all forms behind every bush, camping at trailheads, unauthorized firepits- on and on. These activities, as innocent and uninformed as they may be, degrade the natural environment, put wildlife at risk, create conditions for wildfire, pollute waterways and in the end degrade the Monument's standing which is surely a strain on the resolute employees of the Monument. More funding to provide more staff to manage these issues would be a reasonable start with a new management plan. Cultural Resources/Historical Resources/Sense of Place: As a historian for the region (Southern Utah Oral History Project) I have concerns this year regarding the security and longevity of the archival material stored at Southern Utah University (SUU), in the digital library. Recently, I saw on the SUU archival site that all the documents; papers, surveys, studies, and histories were now one alphabetical list, with no categorization per subject as it once was. GSEBN/BLM stores over twenty years of important and now unique and irreplaceable scientific research, surveys, reports, and historical documents in digital format at SUU. Some acknowledgement, investment, and dedicated person to monitor this invaluable collection should be funded and hired. Support local repositories for local access to such documents. Support indigenous voices in management goals.	Comments for Scoping 2022.pdf
Berry	Scott	N/A	Cultural resources	i.Adopt and implement methods that will accurately quantify the extent of historically focused visitation in areas of traditional interest.	RAD Management (2).pdf
Berry	Scott	N/A	Cultural resources	i.Identify and prohibit types of traditionally historic protection actions implemented by the agency that are likely to detrimentally impact resources pre-existing settlement identified in Proclamation 10682. ii.Develop and adopt numerical standards for historically focused visitation that will ensure the protection of resources pre-existing settlement as identified in Proclamation 10682. These standards must be grounded in the acceptance of the reality that unlimited and ever increasing visitation will inevitably result in detrimental impacts to the entire set of resources and values found in GSENM, including the historical resources.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Berry	Scott	N/A	Cultural resources	i.Protect from human impacts, while not seeking to restore or enhance, historical resources from the time of European settlement to the present , in so far as such efforts do not detrimentally impact resources pre-existing settlement identified in Proclamation 10682. ii.Manage the experience of visitors focused on the European presence in GSENM in such a way as to prevent detrimental impacts to resources pre-existing settlement identified in Proclamation 10682	RAD Management (2).pdf
Miller	Sally	N/A	Cultural resources	On our last trip several years ago, we were unable to find camping spots in many areas, favorite petroglyph panels we had discovered on our previous rambles and had visited for years were marred with graffiti and major use trails, and I contracted giardia in spite of using a filter. Areas that were once relatively untrammled have become overrun with people, cars, bike & vehicle tracks, and signs of dispersed camping along w/the associated trash and human waste left behind are everywhere. As noted, many cultural/archaeological sites have been vandalized with graffiti; while this has been an ongoing problem it appears that it's getting much worse: on our last visit we found new vandalism/graffiti at relatively accessible sites, e.g., along the Escalante River corridor upstream and downstream from "The Bridge" trailhead along highway 12. When we hiked upstream from the mouth of Sand Creek someone had camped and had a (still warm) fire in an alcove with petroglyphs. We have seen some evidence of OHV violations, mostly in the Grand Staircase region including off of Skutumpah Road and on a backcountry hike in that area (I think it was Lick Wash). But the vast majority of resource problems we have seen seem to have been caused by campers, backpackers and dayhikers. I have photo-documented and sent reports of several of these resource violations to the BLM GSEM office.	N/A
Zimmerman	Cliff	N/A	Cultural resources	While hiking near the Lower Gulch Trailhead, my hiking partner and I came upon rock art that was not marked on any map that we knew of. Livestock had obviously trod through the area recently and left their mark on the land near the rock wall. Though there is value in livestock use, this should be limited in order to protect the resources listed above	N/A
Holland	John	N/A	Cultural resources	a.Protecting historical resources in GSENM preserves a relevant context for visitors. Whatever level of management the BLM applies to protect, restore, and increase resiliency of historical resources from the time period since the arrival of European settlers, non government organizations (NGO's)/non-profit organizations must be engaged for the purpose of organizing and completing this work. b.Protecting historical properties in GSENM preserves a relevant context for visitors. To whatever extent the BLM seeks to enhance the condition of historical properties as opposed to maintaining their current condition, NGO's/non-profit organizations must be engaged for the purpose of funding, organizing and completing this work.	Comments to 2022 RMP EIS.pdf
Dissel	Scott	N/A	Cultural resources	Cultural sites, especially those identified by Indigenous Nations (Tribes), and including historic sites as identified by special designation, oral or documented history, or other scientific means must also be protected from cattle, motorized vehicles, over-visitation, or vandalism.	Grand Staircase Escalante Management Plan comments 9.27.2022.pdf
Berry	Scott	N/A	Cultural resources	iii.Sense of Place. A sense of place is a unique collection of qualities and characteristics-visual, cultural, social and environmental, that provide meaning to a location, what makes a place worth caring about. These factors are processed differently by each individual. The resources and values described in Proclamation 10286 that provide a special sense of place to GSENM are the raw materials used by each individual to create his/her/their own sense of place. The realization of the conservation mission at GSENM is the best way to protect the opportunity for every individual to experience his/her/their own sense of place in this unique landscape.	RAD Management (2).pdf
Schwartz	Ephraim	N/A	Cultural resources	Preserve and protect the indigenous archeology in the Monument through more policing of these treasures and more enforcement against those who vandalize the rock art and steal the artifacts.	GSENM comments.docx
Jorgensen	Helene	N/A	Cultural resources	Protection of native American cultural sites With increased visitation and the increased use of off-highway vehicles (OHVs), remote cultural sites have become more accessible to the general public. Unfortunately protection and management of sites continue to be minimal and in many cases non-existent in the GSENM. Many sites have been vandalized and/or looted. To protect native American cultural sites and artifacts, the BLM needs to implement surveillance, including more video monitoring of sites and adjacent parking areas, enforcement of the law and prosecution of perpetrators, and implementing a reward program for information leading to the conviction of perpetrators.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Holland	John	N/A	Cultural resources	The term 'sense of place' has been used in many different ways. It is a multidimensional, complex construct used to characterize the relationship between people and spatial settings. It is a characteristic that some geographic places have and some do not, while to others it is a feeling or perception held by people. (Wikipedia) As a preliminary management concern this concept is quite broad with respect to the question posed in the AMS 6.1-5, "What factors relate to "sense of place" (both natural and human-made), and what management decisions should be made to preserve, interpret, or display them?". The factors related to sense of place are a human construct. People and groups of people attach a certain meaning to GSENM. The purpose of the planning process is to create a framework with clear direction for managers to ensure the protection of resources, objects and values. The BLM should acknowledge the sense of GSENM that is identified by different people and groups in the planning process without allowing the various senses of identity, dependence, or attachment described by any person or group to be perceived as a resource, object, or value needing protection. For example, there are businesses that see GSENM as a resource for minerals they and their predecessors have mined in the past. It is likely that such a business or family would attach a sense of place to GSENM that, if honored in the future, would allow for mining in a place where mining may no longer be allowed. Likewise, and most controversial of all, the ranching families who have used GSENM lands for grazing express a strong sense of place attached to this historical use. Honoring their history is appropriate even if grazing livestock in places their family has used in the past becomes unsustainable. Referring to the original question above, both of these examples are "human-made". Looking at sense of place as an attachment of a certain sense to the "natural" elements within GSENM, I believe proclamation 10286 sufficiently identifies the natural objects, resources and values such that specific management actions can be described adequately within the management plan to protect the natural. On this subject of 'sense of place', there are people and groups of people who "sense" that the federal government has no right to own or manage public lands. Clearly, this describes a sense of place with no place for consideration in reality or in this planning process. There are also people and groups of people with a "sense" that their ancestors were forcibly removed from the region by white settlers and that they have been marginalized ever since. These people deserve full consideration in the planning process through tribal involvement as cooperating agencies and a place at the management table. My sense is we need their land management wisdom on board.	Comments to 2022 RMP EIS.pdf
Craig	Winston	N/A	Cultural resources	As a regular out of state visitor to the GSENM I consider this area of Southern Utah a treasure house of archaeological wonders that need to be properly protected and preserved. We also value the solitude and natural beauty of the area for hiking and visiting any time of the year. The area needs policies and practices that will keep it from being developed in a way out of harmony with those of the indigenous peoples.	N/A
Kropp	Bradley	N/A	Cultural resources	In addition, I have seen far too many areas in Utah where resources such as petroglyphs have been used for target practice or otherwise vandalized. These things are irreplaceable.	N/A
Woodbury	Deborah	N/A	Cultural resources	Protect cultural heritage resources with Tribal groups leading the process.	N/A
King	Robert	N/A	Cultural resources	Listen to Indigenous voices and protect cultural sites. The tribal nations should be the ones to define what cultural sites need to be preserved. These sites may include burial grounds, archaeological sites, gathering places, and more.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Cultural resources	We understand the need for "public use" cultural sites, but are concerned with the designation of three specifically. Are these sites already identified or is three a target? We would like to have further conversations about what sites are recommended for public use, how they will be protected, etc.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Cultural resources	Cultural Resource Management, Native American Religious Concerns, and Tribal Use: The RMP should include all recognized traditional uses to include historical uses (practices that may not have continued). It will be important in the development of a plan to research traditional practices and conduct ethnographic studies to support management of plant/mineral collection, wood cutting, hunting, or pinion nut gathering for example. As a part of cultural resource studies, what kinds of predictive models can be utilized to help further inform management on impacts to cultural sites from grazing and recreational uses? Cultural studies should also include components on cultural affiliation in archeological interpretations. Cultural resource studies and ethnographies will also be an important part of interpretation of tribal resources on the Monument and should be developed with interpretation in mind (in addition to the inventory, affiliation, and management goals of studies). As mentioned above, there needs to be more discussion on the public use of cultural sites.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Campbell	Todd	University of Tampa	Cultural resources	One of the biggest issues that are faced with the current management plan is the course of action that is taken to determine if a community qualifies as an environmental justice community and a low-income population. Although many different Tribal nations fall under the area covered by the Grand Staircase, that doesn't necessarily mean the community they live in will be protected or deemed an environmental justice community unless they meet the qualifications. These include the percentage of minority populations has to be above the average percentage of Utah, minority is as defined by the U.S. government, and the percentage of low-income population has to also be above that of the average percentage of Utah. An area will be deemed a low-income population if the poverty rate is greater than or equal to the poverty rate of the reference area. If it is deemed a low-income population, it tends to also be deemed as an environmental justice community. The issue with this is that Tribal Nations within the given area are sometimes only considered in the environmental justice screening analysis, they aren't always counted or immediately become an environmental justice community. This brings about the issue that if whoever is deciding does not see the value, the sentiment, or all the positives of keeping the Tribal Nation protected and where they are, they might take away the area they inhabit and destroy something very valuable and meaningful and something that should've never been taken from the Tribal Nation to begin with. By not immediately considering or bestowing the area Tribal Nations inhabit as an environmental justice community more harm might be caused by moving them off of their land. Tribal Nations have been helping to preserve the natural land, graze it, keep up practices that help to maximize the nutrients and what the land has to offer, and keep native vegetation at a high. Another big issue is in regards to the handling of the land, there are many different stakeholders in the use and management of BLM managed lands that range all over the board from the Tribal Nations to mineral development. All of these stakeholders want something different out of the GSENM, but the most important that needs to be considered is what is best for the GSENM as a whole and those that inhabit it. When looking at the counties closest, it is seen that their local governments revenue mostly comes from tourism within the GSENM, natural resources, and land ownership. These are things that need to be taken into consideration when deciding their future within the GSENM, but also the effects that each of these have on the environment and well-being of the GSENM as a whole. Although those three are the biggest sources of local government revenue, they each have detrimental effects on the GSENM as a whole and need to be kept within moderation and under guidelines so that the local governments are still able to stay afloat, but so that the GSENM isn't being destroyed in the process. With these not having much structure or management in the current plan, is a big issue that needs to be addressed when considering what outcome we would like to see of the GSENM, which should be for it to thrive and continue to be successful in the way that is best for the monument. We believe that alternative B best addresses all of these issues and brings about the best course of action to see what needs to be done so that the monument in its entirety is being best handled for all the different aspects that play a role.	N/A
Griffin	Simone	BlueRibbon Coalition	Tribal concerns/use	It should also be acknowledged that it is also entirely possible that many of the tribal members who wish to access sacred and cultural sites within the planning area currently or will at some point suffer from mobility impairment disabilities.	GSENM Resource Management Plan Scoping.docx-2.pdf
Painter	Michael J.	Californians for Western Wilderness	Tribal concerns/use	Traditional uses by Native Americans should be recognized, respected, and reinstated as appropriate. Local Tribes should be given active roles in all planning and in the actual management of the Monument, as well as specific places of cultural or spiritual significance to them. Allowance must be made for Tribal members for uses that might otherwise be prohibited to other visitors, such as collecting plants for traditional uses.	N/A
Popejoy	Mike	Grand Canyon Trust	Tribal concerns/use	Cultural resources are among the recreational draws of GSENM as well as subject to visitor impacts. It is critical for Tribes to be consulted about recreation management and to collaborate on visitor education and interpretation of cultural resources. We have drawn heavily from BEITC's Tribal LMP for BENM. We recognize that not all Tribes connected with GSENM are represented by the BEITC and that ongoing collaboration and consultation is key. Management actions REC-6,7,9, and 17-19 were drawn from the BEITC LMP and are intended as a starting point for inclusion of tribal perspectives and are not a substitution for consultation.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Tribal concerns/use	Finally, Tribes should be consulted regarding grazing management, and areas where they may want to see modifications to grazing management. Many landscape components, including objects specified in the proclamations, are culturally significant to associated Tribes. These culturally significant landscape components should be identified, and BLM should consult with Tribes about grazing activities that may affect these components. GRAZ-15 and 16 below were adapted from the Tribal Land Management Plan developed for BENM. We recognize that there are a number of Tribes connected with GSENM not represented by BEITC. These recommendations are intended as a starting point for including tribal perspectives and are not a substitute for consultation.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Tribal concerns/use	Forestry and woodland products are of importance to Tribes, and the BLM should consult with Tribes on all proposed actions and planning elements. These resources are important for ceremonial and traditional food purposes and should be managed accordingly.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Tribal concerns/use	It is imperative that the BLM also recognize the cultural value of visual resources. Tribes should be consulted on all planning or project level decisions that may have an impact on visual resources.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Tribal concerns/use	GSENM is home to species that have long held cultural relevance for Tribes. These species, and the habitats that support them, need to be protected in order to preserve cultural identities. Tribes should be consulted as to how they want these species and their associated habitats to be managed.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Tribal concerns/use	In order to support meaningful tribal consultation (that goes beyond required section 106 consultation) regarding the management of natural and cultural resources that have significance for tribal traditions and identity, we recommend that the Bureau of Land Management work with the Tribes to establish an Inter-tribal advisory group. One position on the Monument Advisory Committee (MAC) is insufficient to provide meaningful input or representation from the diverse Tribes with a connection to this landscape, including the Hopi, Zuni, Diné/Navajo, San Juan Southern Paiute, Kaibab Paiute, Paiute Indian Tribe of Utah, Ute, Ute Mountain Ute, Pueblo of Tesuque, Pueblo of San Felipe, Pueblo of Jemez, and Pueblo of Acoma. We also recommend that the BLM hire a tribal liaison to support tribal engagement in all land management decision-making. This inter-tribal advisory group could help address critical needs such as identifying tribal access needs as part of the land management planning process.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Tribal concerns/use	The AMS contains statements and assumptions that we merit discussion with the Tribes, and that based on our conversations with tribal staff and leaders may not adequately reflect tribal positions such as "landscapes of religious or cultural importance to Tribes and local communities are known or can be inferred and can be shown on a map." In developing access provision, the BLM should review underlying assumptions with the Tribes, and if necessary, revise these assumptions before developing alternatives.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Tribal concerns/use	The management plan should include more robust provisions for tribal inclusion in the site management plan.	Appendix C - ACECs.pdf
Shu	Lyn	Highway 84 LLC	Tribal concerns/use	Native Americans should have 'preapproved' rights to continue with existing practices, without interruption.	N/A
Berry	Scott	N/A	Tribal concerns/use	i.Integrate tribal and Indigenous views, opinions, and contributions at all levels of the decision making process at GSENM. ii.Per direction from the Tribes, Integrate Indigenous Traditional Ecological Knowledge (ITEK) into management decision making and field operations at GSENM. iii.Per direction from the Tribes develop and adopt a formal co-management agreement with tribal interests that will result in the accomplishment of the preceding goals.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Alderson	George and Frances	N/A	Tribal concerns/use	Indigenous nations: We ask BLM to include tribal nations in the planning and management of GSENM. The new plan should identify cultural sites that need to be preserved, and provide for tribal uses of cultural and heritage value.	N/A
Stevens	Hank	N/A	Tribal concerns/use	More importantly, it should be understood, the Indigenous people do not strive to respect the Natural world only in their minds and heart (although they do this) but, rather, they try to make their lives a celebration of life. For the Management of the Grand-Staircase Escalante National Monument, I hope you consider Tribal perspectives and traditional knowledge, and I hope the knowledge that all life plays a vital role in ecosystems is incorporated into the Management plans for both Monuments.	GSENM-Public Comment.pdf
Lish	Christopher	N/A	Tribal concerns/use	One important step to accomplish appropriate protection and management is for the BLM to engage Tribal Nations early in the planning and resource management decision-making process to prioritize traditional ecological knowledge and to better protect cultural resources and values. Tribal nations should define what cultural sites need to be preserved, including archaeological sites, springs, gathering places, and more. Cultural resources and traditional properties and uses should be protected and restored-Indigenous people must continue to have access to the area for traditional and cultural uses such as collecting firewood and herbs.	220926_doi-blm-ut-p010-2022-0006-rmp-eis_grand_staircase-escalante.pdf
Plummer	Richard	N/A	Tribal concerns/use	Regional Tribal Nations should be proactively engaged in planning activities, including especially site-specific management decisions regarding cultural objects and resources important to those constituencies. Any traditional use of sacred sites and places of cultural importance should be facilitated.	N/A
Jorgensen	Helene	N/A	Tribal concerns/use	The BLM also needs to improve information on what the law is, in order to more effectively protect sites. Some visitors may not aware that it is illegal to collect native American artifacts and disturb cultural sites. Information should include posted signs, pamphlets, and roads signs at the boundaries to inform visitors they are in a national monument. Some native American sites should be closed off from the public if they can otherwise not be effectively protected. That could include closing of access roads, ATV trails, etc; posted signs of no public access, and fencing around sensitive sites.	N/A
Sjogren	Morgan	N/A	Tribal concerns/use	Traditional Uses The BLM should ensure the continued traditional use of lands within GSENM by affiliated Tribes that are consistent with the monument's objectives and the purpose of the monument stated per Proclamation 10286.	40 Mile Gulch _ 2 May 2020.pdf
Eaton	Marietta	N/A	Tribal concerns/use	Tribal consultation goes far beyond simply addressing archaeological sites, tribes have valid concerns about the place their ancestors lived and where their remains and spirits still reside. Has GSENM identified Traditional Cultural Properties (TCPs) or special places to tribes? How will traditional uses, like wood, medicinal or sacred plant gathering be facilitated?	GSENM NOI Response.docx
Sjogren	Morgan	N/A	Tribal concerns/use	Tribes should provide input in culturally resource evaluations surveys, educate the BLM about culturally significant areas, and help create public education programs and materials. Tribes should lead site stewardship programs. I signed up as a volunteer for the Utah State Historical Society site stewardship program in 2020. The training (online because of Covid-19) did not include any Tribal input or perspectives, and no indication was made that would be included in later aspects of the program.	40 Mile Gulch _ June 2018.pdf
Not Provided	Jaden	N/A	Tribal concerns/use	7. Cultural resources and traditional properties should be protected and restored, including increased efforts to ensure that Tribal Nations are proactively involved in plan processes, site-specific resource management decisions, and in facilitating ways to protect monument objects and values while retaining traditional use of sacred sites and places of cultural importance.	N/A
Carroll	Lynn	N/A	Tribal concerns/use	BLM should increase efforts to include Tribal Nations in planning and in management decisions regarding cultural sites. I think they should be consulted about ways to allow use of sacred and/or culturally important sites while still protecting monument objects.	N/A
Murray	Danielle	N/A	Tribal concerns/use	Lastly, we want to thank the administration and recognize the importance of the recent release of Joint Secretarial Order 3403 Co-Stewardship with Federally Recognized Indian and Alaska Native Tribes. <sup>28</sup> The Order recognizes that the administration and specifically BLM has "substantial leeway to involve tribes in its decision-making processes." This includes not just engaging tribes in the formal planning processes but through subsequent decisions within a particular resource or geographic area. <sup>29</sup> <sup>28</sup> <a href="https://www.blm.gov/sites/default/files/docs/2022-09/PIM2022-011%20+%20attachment.pdf">https://www.blm.gov/sites/default/files/docs/2022-09/PIM2022-011%20+%20attachment.pdf</a> <sup>29</sup> Id. at 3(b). CLF encourages the agency to consult, meet with and involve Tribes in all decision-making as it relates to the Grand Staircase National Monument, consistent with the nation-to-nation relationship between the United States and federally recognized Tribes. We also want to emphasize that full integration of tribal management strategies, principles and practices cannot be limited to collecting input during NEPA "comment periods." These comment periods can provide barriers to Tribes and can be used by the agency to discount the voice of Tribes in shaping management policy. A recent study from the University of Utah, funded by the National Science Foundation, "Dynamics of Coupled Human-Natural System" uses western scientific data and research approaches to center Native American priorities around firewood collection and forest management. <sup>30</sup> While focused on the Bears Ears region, the research conclusions and co-management & firewood recommendation can easily apply to the Grand Staircase region. We encourage the agency to incorporate these recommendations and studies into the monument planning process. <sup>30</sup> Firewood and Co-management Policy Memo, Implementing Co-management with Tribes by Recognizing and Restoring Indigenous Relationships to Fire, Forest Management, and Woodhauling at Bears Ears National Monument. Sept. 17, 2022. We hope that the agency will work to restore indigenous principles of management to Grand Staircase-Escalante through this planning process as well as all future management decisions.	Scoping Comments GSENM- Conservation Lands Foundation.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Eaton	Marietta	N/A	Tribal concerns/use	The tribal component for planning, is no doubt, already underway and BLM is aware that a better understanding of the tribal perspectives and desires and deserve a meaningful inclusion of those concerns in the RMP. What practices does GSENM have in place to gather and respond to tribal concerns? An attempt to gather traditional information about specific places, ecological knowledge and outcomes from tribes must reflected in the RMP. Tribes are sovereign nations and hold a special relationship with BLM. How does BLM anticipate responding to tribal concerns and specific requests? Who is the decision maker designated to conduct tribal consultation? Tribal consultation should be paid for by the BLM.	GSENM NOI Response.docx
Naples	Jean	N/A	Tribal concerns/use	To ensure complete recognition and acknowledgement for the Indigenous tribes that inhabit this Wilderness Area, I strongly urge the BLM to please document all Indigenous cultural resources and traditional properties and these uses should be protected and restored. Included in this recognition, by the BLM, should include increased efforts to ensure that all Tribal Nations are proactively involved in the planning processes and resource management decisions.	N/A
Stevens	Hank	N/A	Tribal concerns/use	For many Tribal peoples however, our perspective of these lands comes from actually being on the ground and knowing our relation to the landscape. From a Tribal perspective, it's often assumed that when people talk about caring about the Earth's landscape they are actually talking about how to manage the assets that the land's natural resources provide. This always happens without Indigenous input, until now.	GSENM-Public Comment.pdf
Cox	Steven	N/A	Tribal concerns/use	There are innumerable objects and sites of historic and scientific interest. Many of the historical sites are sacred to the Tribal nations.	Comments on the Management Plan for the Grand Staircase Escalante National Monument.docx
Shelton	Carolyn	N/A	Tribal concerns/use	While protecting cultural resources pursuant to the Proclamation is required, it is time for BLM to go further. Tribal Nations should be actively engaged in co-management, and it is time that we give elevated attention to Traditional Knowledge.	N/A
Downing	Dee	N/A	Tribal concerns/use	Rename Jacob Hamblin arch and any other monument names that are associated with folks involved in the Mountain Meadow Massacre as well as other violent settler actions. Perhaps we could ask tribes what name they would like.	N/A
Shaffer	Joseph	N/A	Tribal concerns/use	Respect cultural resources and traditional properties, and invite Tribal Nationals to participate in the planning process.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Tribal concerns/use	It is also important to consider the definition of "science" in this proposal, the term often implies that generating knowledge must follow the rigid analytic bureaucracy of the western scientific tradition. We would like to encourage an expanded definition of science that includes the use of Traditional Ecological Knowledge (TEK) and indigenous epistemologies.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Tribal concerns/use	History, Historical Resources, and Sense of Place: For Navajo, this category is blended into the cultural resource section, so our only comment is that Navajo heritage (whether historic or "prehistoric") sites should be managed in the same manner.	N/A
McCoy	Melissa	U.S. EPA Region 8	Tribal concerns/use	In the Draft EIS, we recommend summarizing the results of tribal consultation and identify the main concerns expressed by tribes (if any), and how those concerns were addressed. We also recommend identifying any protection, mitigation, and enhancement measures identified by tribes.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
King	Catherine	Utah Native Plant Society	Tribal concerns/use	Traditional knowledge should be incorporated in the identification and management of culturally relevant plants. The BLM should follow guidance in the Bears Ears Inter-tribal Coalition's tribal Land Management Plan for Bears Ears National Monument, which states that vegetation should be managed "to support medicinal plants and other vegetative resources deemed by (Tribes) as being culturally relevant where management is consistent with the proper care and management of objects and values."	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Tribal concerns/use	Consult with the Tribes about management of culturally relevant plants and manage vegetation to support medicinal plants and other culturally important vegetative resources.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Tribal concerns/use	Engage with the Tribes regarding Traditional Knowledge about vegetation communities, vegetation restoration techniques, and land management.	UNPS on GSENM 2022 (1).docx
Lehi	Malcom	Ute Mountain Ute Tribe	Tribal concerns/use	A key component of restoring traditional relationships to the land is getting our community out onto the land, particularly our youth and elders. The resource management planning process should prioritize opportunities for tribal youth and elders to participate and connect with this landscape such as collecting firewood and gathering wild plants. Often, additional funding is necessary to support these opportunities. Such opportunities can help tribal members connect personally to the landscape and can promote cross-cultural understanding and learning. I suggest hiring tribal members as staff to work off-reservation to teach others about tribal culture and history. Another option is to reinstate Ute patrols across the entire Grand Staircase-Escalante NM (Request Ute Patrols Memo). Historically, bands of six to eight young men rode on horseback, ensuring the safety of all Ute people, sharing knowledge of the land, and defending the land from intruders. These bands were known as tamuCavaa(tú), which means "to watch, guard, care for, and steward the land." Re-establishing the Ute patrol would restore the long history of Ute stewardship. Already, there are many examples of successful programs of indigenous guardian programs, including in Canada and Australia, which promote protection of the landscape, management of wildlife, prevention of crime, healing of Native communities, reinvigorating indigenous culture, and boosting local economies. A re-established Ute patrol could help mitigate the impacts of tourism and educate tourists on the culture, history, and respectful use of the lands. I recommend consideration of this concept for the management of Grand Staircase-Escalante National Monument.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Lehi	Malcom	Ute Mountain Ute Tribe	Tribal concerns/use	Recognition of UMU and other Tribe's histories Management of the GSENM must recognize indigenous history, including Ute, Paiute, Pueblo, and Navajo history as well. A good first step would be to install signage recognizing this history, including commemorative plaques, particularly at the site of battles, massacres and other historic places. Please consult and work with the UMU Tribe in identifying locations for, and designing, appropriate signage to recognize and commemorate UMU history. The U.S. Department of Interior's Tribal Co-Stewardship Director's Order I (Permanent Instruction Memorandum No. 2022-011) provides detailed explanations on regulations that can be used to promote Native American signage and languages within GSEM2 . . . I <a href="https://www.blm.gov/sites/default/files/docs/2022-09/PIM2022-011%20+%20attachment.pdf">https://www.blm.gov/sites/default/files/docs/2022-09/PIM2022-011%20+%20attachment.pdf</a> 2 Memorandum # 2022-011 states; "The Native American Tourism and Improving Visitor Experience Act (NATIVE Act) is intended, among other purposes, to "increase coordination and collaboration between Federal tourism assets to support Native American tourism" and to "enhance and improve self-determination and self-governance capabilities in the Native American community." Although the act focuses on tourism planning, rather than on land management, several provisions could authorize the BLM to undertake projects that would reflect tribal priorities, and that could be carried out by tribes under the authorities discussed above. In particular, the act's provision requiring agencies to "support the efforts of Indian tribes . . . to identify and enhance or maintain traditions and cultural features that are important to sustain the distinctiveness of the local Native American community" could be read as a broad mandate for land managers to accommodate and support tribal cultural practices on federal lands. These provisions direct federal agencies to incorporate into their plans proposals to "develop innovative visitor portals for parks, landmarks, heritage and cultural sites, and assets that showcase and respect the diversity of the indigenous peoples of the United States"; "share local Native American heritage through the development of bilingual interpretive and directional signage that could include or incorporate English and the local Native American language or languages"; "improve access to transportation programs related to Native American community capacity building for tourism and trade"; "take actions that help empower Indian tribes . . . to showcase the heritage, foods, traditions, history, and continuing vitality of Native American communities"; "support the efforts of Indian tribes . . . to identify and enhance or maintain traditions and cultural features that are important to sustain the distinctiveness of the local Native American community" and "provide visitor experiences that are authentic and respectful"; and "provide assistance to interpret the connections between the indigenous peoples of the United States and the national identity of the United States."	N/A
Lehi	Malcom	Ute Mountain Ute Tribe	Tribal concerns/use	Treaty Rights The Ute Mountain Ute Tribe includes members descended from Utes who occupied the GSENM and Bears Ears National Monument (BENM) regions. Attempts were made to establish a reservation covering 3 million acres in San Juan County, Utah for Ute People following the astounding diminishment of lands reserved for the Utes across much of Colorado in the Kit Carson Treaty of 1868. The "Lynching of the Ute" (aka Posey War) events of 1923 resulted in Utes losing millions of acres of land in Utah, including most of BENM. The crimes committed by townsfolk of Blanding against the Ute after the blasting of the first road through Comb Ridge in January 1923 has made it difficult to discuss the existing rights of Ute People living in White Mesa, even today, 100 years later. Treaty rights must be examined and restored across all of Ute ancestral lands including GSENM, and these efforts should be made prior to completing the GSENM land plan. For example, the UMU Tribe and some Paiute tribal members are interested in the restoration of hunting rights by the State of Utah in the GSENM region and would like assistance in working across jurisdictions to explore restoration of this right. Ute People have a strong hunting culture and this is an area that the UMU Tribe has interest in ongoing dialogue.	N/A
Lehi	Malcom	Ute Mountain Ute Tribe	Tribal concerns/use	Our Tribe and the BLM should support traditional indigenous practice for tribal members who live near GSENM by guaranteeing access to sacred sites; ensuring privacy for and during ceremonies or prayers; and protecting sites and artifacts from looting, vandalism, and other harms. Sacred sites include places that our ancestors once lived, depended on for food, conducted spiritual or ceremonial practices, or are buried. Sacred sites are threatened by vandalism, mining of natural resources, overgrazing, excessive logging or vegetative removal, and restriction of access for Native People. Protection of these sites and artifacts should include closure of sacred sites (closing roads and prohibiting ATV access, except in the case of Native elders); prohibiting development on or near cultural sites, ensuring artifacts are left undisturbed; and preserving natural and cultural resources. Education on proper visitor etiquette will be essential to protecting the many sacred objects, including viewsheds, soundscapes, and preserving the night sky.	N/A
Lehi	Malcom	Ute Mountain Ute Tribe	Tribal concerns/use	Ute Ancestral Gardens Please consider the presence of relict ancestral gardens throughout GSENM and begin research to identify, protect, and restore these sites according to Ute and Pueblo traditions. 3 Researchers at BENM began this work by studying the Four Corners potato which is endemic to both Grand Staircase and Bears Ears and dozens of plant species have been identified as having been cultivated by Native People. The management plan should recognize and engage Tribes in the co-management and restoration of the potato and other cultural species.	N/A
Pollock	Leland	Garfield County Commission	Tribal concerns/use	In addition to pre-historic activities, there are historic, post settlement activities which have continued on to current day. Local citizens have used and continue to use the area for livestock grazing and associated land management, collecting firewood, cutting Christmas trees, hunting, fishing, camping, recreation, and OHV use to name a few. Religious groups have gathered to reenact significant struggles of their ancestors. All of these activities preexisted the monument and were done in a way that kept the area in such a condition that it had consideration for monument status. We discourage any management decisions which impact these local uses.	Garfield County Commission.pdf
Popejoy	Mike	Grand Canyon Trust	Forestry and woodlands	Based on the discussion in the AMS (p. 5-58), it seems that a similar approach to this has been taken in the Buckskin Mountain fuelwood area. However, it is not clear that private cutting is limited to the areas that were hand-thinned as part of a BLM-approved project. The approach we've outlined could be applied to areas thinned in the Buckskin Mountain area, but would not allow tree cutting throughout the entire area due to the potential to affect important landscape components within the Monument, such as old-growth trees, biological soil crusts, and pinyon jays.	Appendix B - RNA Proposals.pdf



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Popejoy	Mike	Grand Canyon Trust	Forestry and woodlands	Figure 5-3 of the AMS indicates the boundaries of Rock Springs Bench and Buckskin Mountain Fuelwood Areas, and the AMS lists "acres of woodland types that would be open to woodland product harvest" as a unit of measure for this category (p. 6-25). We propose that the Rock Springs Bench and Buckskin Mountain Fuel Wood Areas be done away with as designated Fuelwood Areas. Allowing tree cutting in the Monument is inappropriate, certainly not without ecologically-informed sideboards such as tree size/age restrictions and timing restrictions. Instead, we propose that hand cutting areas be designated as part of vegetation restoration projects if prudent and analyzed during a site-specific NEPA process. This would allow for cutting to be done in a more ecologically appropriate way. In addition, this could help BLM with the financial challenges of completing hand-thinning, which in many places is preferable to mechanical thinning and its associated disturbance of soils and biological soil crusts, and potential to facilitate cheatgrass proliferation.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Forestry and woodlands	Hand-cutting of trees by private entities could serve vegetation restoration objectives if cutting is limited to post-settlement trees (<150 years old). Care must be taken to not adversely affect important landscape components, such as old-growth trees (>150 years old), special status species (such as pinyon jays), and biological soil crusts. Recent information indicates that pinyon jays may preferentially nest in younger (post-settlement) pinyon or juniper trees due to the increased foliar cover afforded compared to older trees. Thus, it is important that the appropriate species-specific surveys be completed each year before cutting takes place.	Appendix B - RNA Proposals.pdf
Alderson	George and Frances	N/A	Forestry and woodlands	Old-growth forests: The new plan should identify those areas of ancient pinyon and juniper in GSENM and provide protection for their wildlife values. Opportunities for visitors to see these ancient stands could be appropriate, if trails can be marked from nearby public roads	N/A
J	A	N/A	Forestry and woodlands	FOREST PRODUCTS: Commercial timber harvest should be discouraged. If managers feel that thinning of forested areas might prevent catastrophic wildfire or promote a healthier forest, hired contractors should conform to specific requirements about the type of equipment allowable, duration of use, extent of impacts related to such activities and all should be thoroughly documented. This includes language about monitoring and mitigation related to SS and T&E species or other sensitive habitats or characteristics.	GSENM_20220923.docx
Jackson	Thomas and Marilyn	Star Ranch LLC	Forestry and woodlands	.Conservation - What is being saved? Some natural events such as lightning caused forest fires in Dixie National Forest, lightning fires in the huge coal deposits on the Canaan Mountain, earthquakes along the Hurricane Fault, or volcanoes like the dormant one at Fish Lake, could change the landscape at any time. Some call it 'climate change' but drought, fluctuating temperatures, wind and flash flooding have been occurring as long as records have existed. Surely, the carbon imprint from forest fire smoke is greater than breathing people and cattle! The many vicious forest fires are not only devastating timber, but habitat, and resources to put them out. We recommend reinstating silvicultural thinning, timber harvest, and reestablishing sawmills.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Forestry and woodlands	The massive forest fires in the Western US only prove the need for better forest management, not the elimination of sawmills.	N/A
Griffin	Simone	BlueRibbon Coalition	Fire and Fuels	The BLM should be using non-fire techniques such as mechanical thinning as often as possible to keep the forest healthy and thriving. These techniques are the most effective in preserving wildlife, trails and cultural sites. We prefer proactive management within the forest to avoid closures. Any area managed as Wilderness is a great threat to wildlife and habitat as many vegetation treatments cannot move forward based off of these designations and wildfire can completely destroy ecosystems and habitat.	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Fire and Fuels	Vegetation treatments that reduce wildfire risk might compromise the current scenery integrity or non motorized recreation opportunity, but if a wildfire happens the impact of the fire will likely cause a greater impact to both of these values. Decision makers should be able to make balance-of-harm or benefit determinations for these resource management activities instead of being required to meet arbitrary objectives.	GSENM Resource Management Plan Scoping.docx-2.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Fire and Fuels	The agency should adequately consider that negative impacts to fish and wildlife from fires are thousands of times greater than OHV recreation.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Popejoy	Mike	Grand Canyon Trust	Fire and Fuels	In addition, parameters need to be established to define when treatments have met objectives. BLM should define measurable, ecologically meaningful objectives for cover of vegetation functional groups, bare ground, species richness, and biological soil crust to determine when treatment objectives have been met. These goals should be based on the ecological site description for each treatment site. Surface-disrupting activities should not be resumed until these parameters are met. In the case of livestock grazing, this may be longer than the typical two-year standard.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Fire and Fuels	The AMS presents conflicting lines of evidence to explain the need for fuels treatments (see pp 5-58 to 5-64). On one hand, it notes that Monument history over the last 20 years indicates low fire incidence, just 10,840 acres total over two decades. The AMS does not include data for fire prior to 2000, but this low estimation is consistent with research on the subject, which indicates that fire frequency is much less frequent than the 0-30 year fire return interval cited (p. 5-60). <sup>73</sup> The AMS also says that emergency stabilization measures rarely need to be implemented due to the infrequent fires on GSENM. The AMS predicts that the "potential for uncharacteristic wildfire effects will continue under present management" but it has already noted that fire frequency is low in GSENM and there have been no uncharacteristic wildfire effects. <sup>73</sup> Floyd, ML, WH Romme, DP Hanna, and DD Hanna. (2017). Historical and modern fire regimes in piñon-juniper woodlands, dinosaur National Monument, United States. <i>Rangeland ecology &amp; management</i> 70 (3), 348-355.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Fire and Fuels	The draft EIS should acknowledge that there are grave risks inherent in fuels treatments. Vegetation, soils, biological soil crust, and hydrology are impacted at the project site, sometimes permanently depending on subsequent management. The surface disturbance increases the chances that cheatgrass and other non-native species will invade, which is one of the most disruptive and often irreversible outcomes in public lands management. Therefore, the BLM should be careful to weigh the risks of wildfire on the Monument against the risks of fuels treatments, especially if fire is not a frequent occurrence on the Monument.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Fire and Fuels	To fulfill the direction of the Proclamations, as well as that governing NLCS units, the BLM needs an objective, transparent decision-making procedure based on science to determine whether and where to conduct treatments. At the very least soil type and Ecological Site Descriptions must be used to determine whether pinyon or juniper are appropriate in a certain area or are expanding into a sagebrush community. The BLM also needs to evaluate the ages of the trees in proposed vegetation treatment project areas and determine whether or not they are relict communities where all treatments should be avoided.	Appendix C - ACECs.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Fire and Fuels	Vegetation treatments remove tons of above and below-ground biomass that would otherwise sequester carbon. According to the AMS itself, "Terrestrial ecosystems on federal lands were estimated to have sequestered an average of 195 million metric tons of CO2e per year nationally between 2005 and 2014; in Utah, the annual average sequestration was 8.6 million metric tons of CO2e per year (Buursink et al. 2018)" (p. 5-101). The Agency must provide an accurate estimate of the release of carbon into the atmosphere from each treatment they propose.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Fire and Fuels	The AMS states that the relatively low total acres burned in GSENM over the last 20 years (10,840 acres) "is likely due to fire suppression tactics that have been implemented since Euro-American settlement" (5-60). It would be useful for the DEIS to discuss what fire suppression efforts have been enacted by the BLM in GSENM. The AMS indicates that 568,600 acres are categorized as Fire Regime Group V, which is characterized by fire frequency of 200+ years (5-59, 5-60). Thus, for a large portion of the landscape fire would not necessarily be expected in the time since Euro-American settlement. Summarizing the fire suppression efforts that have taken place in which fire regime groups would help determine the extent to which lack of fire in GSENM is attributable to past suppression efforts.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Fire and Fuels	Where appropriate, fire should be allowed to play its historic role in the ecosystem. In light of the suppression efforts mentioned, the BLM should pivot to allowing naturally-caused ignitions to burn when appropriate, namely if they would contribute to natural ecological processes and not threaten the integrity of Monument objects. Prescribed fire could be employed in a similar manner, and should seek to mimic historical fire regimes. Utilizing fire in this way could help to make up for the lack of fire on much of the landscape since Euro-American settlement. Of course, the potential for post-fire cheatgrass proliferation is a significant concern. We recommend that fire be suppressed, and prescribed fire not used, where cheatgrass is known to be present and would be expected to proliferate post-fire.	Appendix A - Figures & Tables.pdf
WARD	EVERETT	N/A	Fire and Fuels	To protect relict vegetative communities, old-growth pinyon pine and juniper forest, and biological soil crust, BLM must prohibit mechanical treatments of sagebrush, pinyon pine and juniper, and other vegetation. This includes chaining, mastication, harrowing, and other heavy-machinery removal methods that, as recognized in the original Monument Management Plan, have too much potential to harm monument objects. For this same reason, BLM must only use native species when restoring and reseeding areas within the Monument, including after wildfire.	N/A
Not Provided	Not Provided	N/A	Fire and Fuels	Future plans should allow for managers to continue implementing vegetation treatments to benefit wildlife, grazing, and natural landscape resiliency including lessening catastrophic wildfire danger. This includes pinyon-juniper removal, sagebrush and native plant restoration, cheatgrass abatement (herbicide), and stabilization. Considering allowing fires to burn naturally should also be an allowable management tool.	N/A
Berry	Scott	N/A	Fire and Fuels	i.Adopt and implement the Resistance-Acceptance-Direction model for understanding and responding to wildfire risk at GSENM. Management Foundations for Navigating Ecological Transformation by Resisting, Accepting or Directing Social-Ecological Change , Magness, et. al.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
"Crockett' Dumans	Millard	N/A	Fire and Fuels	There are many successful examples on the adjacent Dixie NF where in the 70's and early 80's, these very large, active Head Cuts were reclaimed and vegetated. Mechanically, these raw Head Cuts should be reclaimed restoring a more quality, less erosive watershed.	N/A
Larsen	Hanna	N/A	Fire and Fuels	To protect monument objects and values, the BLM should also prohibit mechanical treatments of sagebrush, pinyon pine, juniper, and other vegetation, and should use only native species for restoration and post-fire seeding.	N/A
Berry	Scott	N/A	Fire and Fuels	ii.Integrate high quality wild fire science into decision making and operations at GSENM, informed by current climate science forecasts.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Berry	Scott	N/A	Fire and Fuels	iv.Design and establish visitor management regulations that will reduce the risk of visitor caused wildfire.	RAD Management (2).pdf
J	A	N/A	Fire and Fuels	FIRE: Any fire or prescribed fire should include a requirement for a Resource Advisor. I want to see language in this plan that gets specific about inventory, allowable fire-fighting actions, rehab, monitoring, provisions for SS and T&E areas, etc. If you plan to address this in a separate plan, put a deadline in this plan - I don't want to wait more than a couple years for this landscape-scale impact to be addressed. Post-fire seeding should be explicitly addressed and generally discouraged due to allowances for non-natives in seed mixes. If post-fire seeding is necessary, create explicit metrics for discouraging inclusion of non-natives.	GSENM_20220923.docx
Bunting	Bruce	N/A	Fire and Fuels	Management of this area could be improved by full logging the juniper, pine and brush which would improve the moisture for grassland for the benefit of more food and wildlife and livestock and better water storage.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Fire and Fuels	Wildfire and Fuels Management, and Forestry and Woodland Products: Many Navajos are reliant on wood collecting for heating fuel and other traditional uses (hogans and teepee poles for example). The RMP must include provisions for traditional uses, their permitting, and perhaps partnerships with programs like Wood for Life (a Forest Service program that helps provide excess and thinned wood to needy Navajo families). Forests and woodlands should also be managed to protect ecosystem function and resilience and to provide for human safety.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Fire and Fuels	.Conservation - What is being saved? Some natural events such as lightning caused forest fires in Dixie National Forest, lightning fires in the huge coal deposits on the Canaan Mountain, earthquakes along the Hurricane Fault, or volcanoes like the dormant one at Fish Lake, could change the landscape at any time. Some call it 'climate change' but drought, fluctuating temperatures, wind and flash flooding have been occurring as long as records have existed. Surely, the carbon imprint from forest fire smoke is greater than breathing people and cattle! The many vicious forest fires are not only devastating timber, but habitat, and resources to put them out. We recommend reinstating silvicultural thinning, timber harvest, and reestablishing sawmills.	N/A

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Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Fire and Fuels	The practice of actively managing timber products and livestock through multiple use is very similar to a common practice known as silvopasture. In short, "Silvopasture practice is an agroforestry technology combining trees, forage, and shrubs with livestock operation. Many researchers have noted that silvopasture practices provide environmental benefits such as water quality improvement, soil conservation, carbon sequestration, wildlife habitat protection, and aesthetics." (25) This intentional management of livestock with trees/timber products, has multiple environmental benefits, including but not limited to, active fuel load management in terms of wildfire reduction. As such, the State recommends that actively managing the State's forests and woodlands (particularly those found in the GSENM) under principles of agroforestry/silvopasture, be included in the BLMs GSENM RMP analysis. (25) Ram K. Shrestha, et al, Valuing environmental benefits of silvopasture practice: a case study of the Lake Okeechobee watershed in Florida, Ecological Economics, Volume 49, Issue 3, pp. 349-59, available at: <a href="https://www.sciencedirect.com/science/article/pii/S0921800904001041">https://www.sciencedirect.com/science/article/pii/S0921800904001041</a> (2004); citing Alavalapati, J.R.R., Nair, P.K., 2001. Socioeconomic and institutional perspectives of agroforestry. In: Palo, M., Uusivuori, J. World Forests, Society, and Environment-Markets and Policies. Kluwer Academic Publishing, Dordrecht, pp. 71-81; Clason, T.R., Sharrow, S.H., 2000. Silvopasture practices. In: Garrett, H.E., Rietveld, W.J., Fisher, R.F. North American Agroforestry: An Integrated Science and Practice. American Society of Agronomy, Madison, WI, pp. 119-148; Garrett, H.E., Rietveld, W.J., Fisher, R.F., 2000. North American Agroforestry: An Integrated Science and Practice. American Society of Agronomy, Madison, WI; Kurtz, W.B., 2000. Economics and policy of agroforestry. In: Garrett, H.E., Rietveld, W.J., Fisher, R.F. North American Agroforestry: An Integrated Science and Practice. American Society of Agronomy, Madison, WI, pp. 321-360.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Campbell	Todd	University of Tampa	Fire and Fuels	While wildfires are a natural part of an ecosystem, they are typically in low amounts so any increase in fire can alter the ecosystem. Some species are adapted to withstand the natural fire regime but salt desert shrub and blackbrush are two examples of communities that take decades to centuries for the vegetation to recover. Invasive species such as cheatgrass and prolonged drought conditions increase the risk of uncharacteristic wildfires. Only a small area of the entire GSENM has been burned with an even smaller amount being human-caused and therefore only a few emergency stabilization and rehabilitation efforts have been needed in this area. Not all wildfires are bad but it is important to reduce the amount of uncharacteristic wildfires in the area.	N/A
Lehi	Malcom	Ute Mountain Ute Tribe	Fire and Fuels	Firewood Gathering Elders from Tribes around Grand Staircase still need firewood resources. Many community members rely on firewood for home heating, and within GSENM there are places closer to home that they could be collecting. I am hearing reports that they are driving long distances now to collect firewood and it would be good to start conversations with these tribal members who need this critical resource and ensure they have places nearby to harvest.	N/A
Pollock	Leland	Garfield County Commission	Fire and Fuels	Garfield County recognizes that years of artificial suppression of fire combined with multiple decades of passive federal land management have changed plant communities and resulted in some areas with plant communities that have little to no resistance or resiliency of fire. Due to our low population, our biggest threat to air quality is large, uncontrolled wildfire. We support active management of vegetation to reduce fuel loads. To achieve this, we recommend a combined use of prescribed fire, mechanical, chemical, and grazing techniques to be used at the appropriate time and location.	Garfield County Commission.pdf
Murray	Michael B.	Coalition to Protect America's National Parks	Fish and wildlife	Protection of wildlife species in the Planning Area, which include big game populations and more than 40 special status species, will also help to protect wildlife values in immediately adjacent NPS managed areas. As stated in Bryce Canyon's Foundation Document, "Park boundaries are irrelevant to the migratory hummingbirds or nesting peregrine falcons; Rocky Mountain elk, mule deer, and pronghorn cross through the plateau forests and meadows within and beyond the park; other animals have adapted to occupy the distinctive erosional features of the amphitheater and adjacent habitats." 18 18 Foundation Document, Bryce Canyon National Park, May 2014 at 6. ( <a href="https://www.nps.gov/subjects/sound/upload/BRCA_FD_SP.pdf">https://www.nps.gov/subjects/sound/upload/BRCA_FD_SP.pdf</a> ); see also Species Checklist for Bryce Canyon National Park at <a href="https://irma.nps.gov/NPSpecies/Reports/SpeciesList/Species%20Checklist/BRCA/1,2,4,5,3,11,12,7,9,6,8,10,13,14,16,15,17/false">https://irma.nps.gov/NPSpecies/Reports/SpeciesList/Species%20Checklist/BRCA/1,2,4,5,3,11,12,7,9,6,8,10,13,14,16,15,17/false</a> , viewed November 15, 2018. Capitol Reef likewise shares wildlife species habitat with the adjacent Planning Area, including, among others, mule deer and bighorn sheep as well as threatened, endangered and sensitive species such as the bald eagle, Mexican spotted owl, peregrine falcon, and the southwestern willow flycatcher. 19 19 See Species Checklist for Capitol Reef National Park at <a href="https://www.nps.gov/care/learn/nature/species-lists.htm">https://www.nps.gov/care/learn/nature/species-lists.htm</a> , viewed November 15, 2018; see also Capitol Reef National Park General Management Plan, September, 1998 at 79 ( <a href="https://home.nps.gov/care/learn/management/upload/caregmp.pdf">https://home.nps.gov/care/learn/management/upload/caregmp.pdf</a> ). Glen Canyon hosts bighorn sheep, bald eagles, golden eagles, and California condors, and these species ranges are not confined to the Parks. 20 In addition, the Escalante River and its tributaries within the monument feed into riparian areas in Glen Canyon. The health of these water bodies is vital to the health of numerous fish species downriver, including endangered species such as the Colorado pikeminnow, Razorback sucker, bonytail and humpback chub. 20 See Species Checklist for Glen Canyon National Recreation Area at <a href="https://home.nps.gov/glca/learn/nature/animals.htm">https://home.nps.gov/glca/learn/nature/animals.htm</a> , viewed November 15, 2018. Along with being important components of these park ecosystems, these animals are also observed and enjoyed by park visitors. They are NPS resources and values that are important to consider in monument management and planning decisions. BLM should exert maximum effort to achieve stated wildlife conservation goals: preserving the integrity of wildlife corridors, migration routes, and access to key forage, nesting, and spawning areas by limiting adverse impacts from development in the monument; managing habitats for the recovery or reestablishment of native populations and work to improve habitat quantity and quality (forage, water, cover, space, security, trophic level integrity, and biogeochemical processes); and conserving habitat for migratory birds. Finally, BLM should continue to facilitate appropriate research to improve understanding of fish and wildlife species and habitat and increase public education and appreciation of fish and wildlife species through interpretation.	NPCA & Coalition GSE RMP scoping FINAL.pdf
Murray	Michael B.	Coalition to Protect America's National Parks	Fish and wildlife	The GSENM landscape includes five life zones, from low-lying desert to coniferous forest, providing opportunities for biological study of an area that is "perhaps the richest floristic region in the Intermountain West" and "characterized by a diversity of species" such as mountain lion, bear, desert bighorn sheep and over 200 species of birds. 17 BLM should identify and protect wildlife corridors, migration pathways and critical habitat for wildlife and vegetation to preserve healthy wildlife communities, overall ecosystem functions and resiliency in a changing climate. 17 Id.	NPCA & Coalition GSE RMP scoping FINAL.pdf
J	A	N/A	Fish and wildlife	WILDLIFE: I want to see language about protecting and promoting wildlife corridors. Protecting wildlife corridors should take precedence over all other uses. Protect species so they don't have to be included on the ESA list. Protect raptor habitats. Do you expect to include language about animal damage control? Or will you defer to Utah DWR? Include additional language to protect species from excessive take (e.g. UPD).	GSENM_20220923.docx

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Jackson	Thomas and Marilyn	Star Ranch LLC	Fish and wildlife	Add. Native Wildlife, and that NO TRANSPLANTS be allowed, and recognizing that California Condors were listed as non essential, and no wolves or wolverines have been recorded.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Fish and wildlife	Table 5-29 lists Potential for Occurrence is Rare for the greater part of the chart. We highly recommend that they be erased from the list. Only 137 species were counted in 2021 and none of these species merit such restrictive action, without further evidence.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Fish and wildlife	Then, there's the designation of sensitive, threatened or endangered species by BLM. Granted, there are some species that are natural predators, and historically their populations have been decreased to protect the people who live near their habitats. The choice, of how many and which species, matters. There are obvious conflicts between Fish & Game goals, BLM-GSENM, Forest Service and local community residents. Some say local community residents are indeed, the endangered species: homo sapiens Garfield-Kane-San Juan Existens ! Stakeholders are mentioned, but collectively disregarded if their livelihoods REALLY depend on ACCESS to Public lands. Wisdom tells us we shouldn't eat wolves, cougars, coyotes or prairie dogs. But, competition from transplanted species of big horn sheep, mountain lions, California Condors, Wild vultures, wild turkeys, and wolves make it difficult for domestic herds of cattle to compete, with antelope, deer and elk which are not tagged and contained in allotments. Some years back, there was an effort to use endangered species habitat to restrict land development near the Monument until it was noted that they were MEXICAN spotted owls, CALIFORNIA Condors, COLORADO Squawfish and VIRGIN RIVER WINDFIN MINNOWS (Washington County)! It can be safely said that sage grouse, beavers, desert tortoises and others have been used to curb local community growth.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Fish and wildlife	Efforts to work with Fish and Game should curtail the growth of competing critters. In 1982, twelve Bighorn sheep were transplanted, and that herd has grown substantially whereas domestic cattle numbers have declined. Garfield County sent a letter to Bruce Bonebrake at the Division of Wildlife Services, stating that Garfield County opposed any beaver being introduced, and GSENM should abide by this too. In April of 1996, Escalante City documented over 30 incidents of bears and cougars and DWR agreed to tag the critters and work to keep them miles from the communities.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Fish and wildlife	The language, "Protect and restore GSENM's biological resources... including mountain lion... "Does not give a target population or date for accomplishing a goal. We recommend adding language that any individual suffering loss from predators, such as wolves, mountain lions, bears, etc. be awarded no less than \$6 million dollars per incident, without lawsuit, as this would be the minimum cost of bringing a lawsuit to fruition. Of course, we can say with certainty there would be pushback accusing negligence or voluntarily being put in harm's way! Engage in jurisdictional community-based, planning. In April of 1996 there were so many incidents of predators that the Escalante Mayor and City Council met with DWR and Fish and Game officers who agreed to track predators and to diligently work to keep them away from communities, especially Boulder and Escalante.	N/A
Fiebig	Michael	American Rivers	Fish and wildlife; general	In all, 8 amphibian species, 190 bird species, 54 mammal species, 20 fish species, and 20 reptile species call the Escalante watershed home.	GSENM Scoping Comments_American Rivers_DOI-BLM-UT-P010-2022-0006-RMP-EIS.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Fish and wildlife; general	4.The agency should adequately consider that the road density impact criteria are not site-specific and, consequently, not valid for the project area. 5.The agency should adequately consider that the road density impact criteria over-estimates the impact of motorized recreation on wildlife and does not reasonably consider mitigation measures and alternatives that could be implemented. 6.The agency should adequately consider that the road density impact criteria are not a reasonable measure of motorized impact on wildlife habitat.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Fish and wildlife; general	9. The agency should adequately consider that; a.OHVs cause less severe disturbance of wildlife because the relatively low level of sound that they emit provides a soft warning of human presence compared to non-motorized recreation. b.For example, OHVs have never had a damaging encounter with a bear including grizzlies while hikers and hunters have had many that have ended badly for both the humans and the bear.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Fish and wildlife; general	.The agency should adequately consider that in many cases wildlife populations are at all-time highs and in excess of the carrying capacity of the land.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Fish and wildlife; general	The agency should adequately consider that adequately documented OHV impacts should be compared to natural levels and natural changes in order to avoid impacts being over-stated and leading to arbitrary and capricious decision-making.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Fish and wildlife; general	The agency should adequately consider that; a.Human activities other than OHV recreation have a greater impact on wildlife and the natural environment. b.Repeating and exaggerating nontruths about the negative impacts of motorized recreation on fish and wildlife does not make them true and represents arbitrary and capricious decision-making.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Fish and wildlife; general	The agency should adequately consider that; a.Topography is a significant factor affecting wildlife habitat. b.The vertical topography in the project area greatly reduces the impact on wildlife and is just as effective as or more effective than cover. c.The analysis should reasonably consider topography.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Popejoy	Mike	Grand Canyon Trust	Fish and wildlife; general	The Paria River aquatic habitats have gradually declined due to human influences such as irrigation and water rights allocations outside of Monument boundaries. Climatic changes like drought, smaller snow packs, and rising temperatures are exacerbating the current situation, which is only expected to worsen. Additionally, invasive tamarisk and Russian olive have also degraded instream and riparian conditions. We recommend that the BLM consult with federal, state, and private entities, to mitigate these impacts by managing invasive species, incorporating climate impact considerations into the final management strategies, and, to the extent that the BLM has the authority to do so, manage instream flow to ensure the aquatic and riparian habitats are healthy enough to support and protect native fish populations.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Fish and wildlife; general	The Utah Wildlife Migration Initiative has also tracked movement of the Kaiparowits mule deer herd and is studying the movement and survival of the Kaiparowits Bighorn Sheep in and near the Monument. The study and understanding of migration corridors is ongoing, with researchers identifying additional routes and gaining a better appreciation of the importance to wildlife of movement across a landscape. As we are continuing to learn how activity, development, and disturbance affect the behavior of migrating big game, the Monument plan should contain enough flexibility to incorporate additional findings as they are developed. <sup>83</sup> Flexible, ongoing planning to conserve migration routes is consistent with the federal intent of several administrative orders in recent years. <sup>84</sup> 83 For example, see Hall Sawyer, Nicole M. Korfanta, Ryan M. Nielson, Kevin L. Monteith & Dale Strickland, Mule deer and energy development-Long-term trends of habituation and abundance, Global Change Biology (Apr. 4, 2017) (see also studies cited within this article); Hall Sawyer, Nicole M. Korfanta, Matthew J. Kauffman, Benjamin S.Robb, Andrew C. Telander, Todd Mattson, Trade-offs between utility-scale solar development and ungulates on western rangelands, Frontiers in Ecology and the Environment (Apr. 21, 2022). 84 String cite S.O. 3362; America the Beautiful EO (America the Beautiful reports and other documentation consistently stress the importance of connecting conserved spaces). We urge the BLM to include in its Management Plan measures to protect these and other corridors that may be identified in the future. Such measures could include those similar to objectives identified in the 2000 Management Plan (especially FW-5 and FW-6), including reducing activity and disturbance during seasonal migrations where appropriate and limiting development and activity that may negatively impact the corridor or movement.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Fish and wildlife; general	Our coalition asks the BLM to consider several impacts to wildlife in the scoping process and final habitat management decisions. First, we ask them to consider habitat connectivity. While agencies have historically leaned toward habitat management techniques to revive threatened or endangered species, many species, including those threatened and endangered, are made healthier from landscape scale management techniques that provide for habitat connectivity.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Fish and wildlife; general	Pinyon jay populations are currently undergoing significant decline. An estimated 85% of the pinyon jay population was lost between 1967 and 2015, and the population is anticipated to decline by another 50% in 19 years. <sup>86</sup> In April 2022 the pinyon jay was petitioned for listing under the Endangered Species Act. The only mention of pinyon jay in the AMS is as a USFWS Bird of Conservation Concern (AMS p. 5-66). In addition, pinyon jay is designated as a Species of Greatest Conservation Need by the Utah Division of Wildlife Resources as part of its Wildlife Action Plan. <sup>87</sup> For all of these reasons, the pinyon jay merits substantive discussion in the Draft EIS. 86 Boone JD, Witt C, Ammon EM (2021) Behavior-specific occurrence patterns of Pinyon Jays (Gymnorhinus cyanocephalus) in three Great Basin study areas and significance for pinyon-juniper woodland management. PLoS ONE 16(1): e0237721. <a href="https://doi.org/10.1371/journal.pone.0237621">https://doi.org/10.1371/journal.pone.0237621</a> ; Partners in Flight Avian Conservation Assessment Database, <a href="https://pif.birdconservancy.org/avian-conservation-assessment-database-scores/">https://pif.birdconservancy.org/avian-conservation-assessment-database-scores/</a> . 87 2020 Addendum - Changes to Utah Species of Greatest Conservation Need, <a href="https://wildlife.utah.gov/pdf/WAP/2020-addendum.pdf">https://wildlife.utah.gov/pdf/WAP/2020-addendum.pdf</a> , pp. 1, 3; see also Utah's Species of Greatest Conservation Need October 2021, <a href="https://wildlife.utah.gov/pdf/WAP/2021-10-sgcn-list.pdf">https://wildlife.utah.gov/pdf/WAP/2021-10-sgcn-list.pdf</a> , p. 1.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Fish and wildlife; general	The southwestern United States is experiencing the driest 22-year period in 1,200 years, <sup>74</sup> and this trend is expected to continue. These climatic changes could significantly alter important perennial water sources within the Monument that provide habitat for a diversity of species. This includes the Upper Escalante Canyons and Sand Creek, and the Upper Paria Basin identified in Proclamation 10286. 74 Harvey, C. (2022, February 15). Western 'Megadrought' is Worst in 1,200 Years. Scientific American. Retrieved September 14, 2022, from <a href="https://www.scientificamerican.com/article/western-megadrought-is-the-worst-in-1-200-years/">https://www.scientificamerican.com/article/western-megadrought-is-the-worst-in-1-200-years/</a> These systems contain the southern extent of the range for the flannelmouth sucker, bluehead sucker, and Colorado cutthroat trout (mainly at higher elevations outside the decision area), which highlights the importance of sustaining flows in these systems. The BLM should take management actions to establish habitat connectivity by ensuring sustained flows and appropriate water quality throughout the Escalante and Paria River systems.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Fish and wildlife; general	Second, we ask them to take soundscape issues into consideration, as we also know that many species of wildlife can be impacted by noise pollution. <sup>79</sup> And third, climate impacts should be a top consideration in the scoping process and final decisions on habitat management. In addition to the impacts that climate change will have on already listed threatened and endangered species, other species are also at risk of being listed due to climate change. Utah ranks 10th in overall biological diversity and 5th for endemism in the United States. <sup>80</sup> However, worldwide biodiversity has declined 70% since the 1970s <sup>81</sup> , and Utah ranks 5th for species at risk of extinction. Therefore, it is essential that any habitat improvement projects consider the full range of their impact. <sup>82</sup> 79 Adam Switalski (2018). Off-highway vehicle recreation in drylands: A literature review and recommendations for best management practices. Journal of Outdoor Recreation and Tourism, 21, 87-96. <a href="https://doi.org/10.1016/j.jort.2018.01.001">https://doi.org/10.1016/j.jort.2018.01.001</a> 80 Utah Wildlife Action Plan Joint Team. (2015). Utah Wildlife Action Plan: A plan for managing native wildlife species and their habitats to help prevent listing under the Endangered Species Act. Publication number 15-14. Utah Division of Wildlife Resources, Salt Lake City, Utah, USA. 81 Almond, R. E. A., Grooten, M., & Petersen, T. (Eds.). (2020). (rep.). Living Planet Report 2020- Bending the curve of biodiversity loss. World Wildlife Fund. Retrieved May 9, 2022, from <a href="https://f.hubspotusercontent20.net/hubfs/4783129/LPR/PDFs/ENGLISH-FULL.pdf">https://f.hubspotusercontent20.net/hubfs/4783129/LPR/PDFs/ENGLISH-FULL.pdf</a> . 82 Utah Wildlife Action Plan Joint Team. (2015). Utah Wildlife Action Plan: A plan for managing native wildlife species and their habitats to help prevent listing under the Endangered Species Act. Publication number 15-14. Utah Division of Wildlife Resources, Salt Lake City, Utah, USA.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Fish and wildlife; general	We also recommend that the Monument include soundscapes when making wildlife management decisions	Appendix A - Figures & Tables.pdf
Alderson	George and Frances	N/A	Fish and wildlife; general	Motorized vehicle routes: The new plan should analyze the impacts being made by off-road vehicles against wildlife habitat and natural conditions.	N/A
Sujjett	Roy	N/A	Fish and wildlife; general	STOP trapping in the GSENM!Too many good cattle driving dogs are being caught, too many cowboys and ranchers are having to shot there 3 killed dogs. Coyotes, cats, jack rabbits and bottentails which plague our alfala feilds. And I like to here them. Please stop trapping.	N/A
Berry	Scott	N/A	Fish and wildlife; general	Defer any future actions in GSENM by Utah Wildlife Services with respect to predator and nuisance animal control until such time as an in depth scientific analysis has been completed with respect to the impacts of predator reduction on ecosystem function, and the conservation of GSENM ROV's.	RAD Management (2).pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Berry	Scott	N/A	Fish and wildlife; general	Fisheries. Implement stream protections programs that will support the native fish resource present in GSENM. The principal threats at this time are changes in the water regime with respect to both the volume and timing of stream flows, increasing stream temperatures, and the breakdown and disturbance of stream banks by grazing domestic cattle.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Berry	Scott	N/A	Fish and wildlife; general	Recognition that all wildlife present in GSENM is part of one or more functional and dynamic ecosystems, dependent in complex ways on all the components of those systems. For that reason wildlife cannot be analyzed or understood in isolation from those systems. Species presence and distribution, stability, habitat extent, and community structure, along the carbon, water and energy cycles, are the principal components of those systems. The agency should abandon the traditional "species by species" analysis of wildlife, and replace it with an approach that concentrates on the preservation of ecosystem factors that wildlife requires.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Not Provided	Not Provided	N/A	Fish and wildlife; general	Protect birds. Threatened Mexican spotted owls, endangered Southwestern willow flycatchers, and pinyon jays need their habitat protected from grazing and clearcutting.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Fish and wildlife; general	Wildlife and Fisheries: Recreational activities and grazing may significantly disturb wildlife. Recreationists and cows, for example, may encroach on water sources scaring off more sensitive species, so excluding livestock and not allowing camping within ½ mile or ¼ miles of water sources may mitigate these impacts.	N/A
Feinberg	Jackie	The Pew Charitable Trusts	Fish and wildlife; general	According to the Western Association of Fish and Wildlife Agencies' "2020 Range-Wide Status of Black-Tailed and Mule Deer" report, the Utah mule deer population is experiencing a marked decline, with current numbers well below objectives. The report states: "[T]he current statewide population estimate is 319,150, with a total population objective of 453,100. This is a decrease of over 50,000 deer from previous years, largely due to severe drought followed by harsh winter conditions."1 ( <a href="https://wafwa.org/wp-content/uploads/2020/08/2020_MuleDeer-and-BTD_Status-Update.pdf">https://wafwa.org/wp-content/uploads/2020/08/2020_MuleDeer-and-BTD_Status-Update.pdf</a> ) Utah is addressing this population decline with new policies that prioritize the maintenance of functional migration corridors for mule deer and other big game. In 2020, the Utah State Legislature passed a measure2 recognizing that protection of fish and wildlife migration corridors improves populations that are crucial to the state's outdoor recreation economy and urged "continued state investment in wildlife connectivity and new policies to protect and restore species connectivity and promote human safety." (2) <a href="https://le.utah.gov/~2020/bills/static/HCR013.html">https://le.utah.gov/~2020/bills/static/HCR013.html</a> The Utah Department of Wildlife Resources (UDWR) has identified multiple migration corridors and other crucial seasonal habitats as a conservation priority in their most recent State Action Plan.3 UDWR has conducted migration research on the Kaiparowits and the Paunsaugunt mule deer herds that utilize the GSENM. The Paunsaugunt mule deer herd, which Proclamation 10286 specifically identifies, consists of roughly 5,200 animals that leave their summer range in the Paunsaugunt Plateau in the fall, traveling up to 80 miles across the Monument to the Buckskin Mountains along the Utah-Arizona border. Here, they share winter range with the Kaibab Plateau mule deer herd and then in the spring, the herd makes its way back across the Monument to return to summer range. Similarly, the Kaiparowits mule deer migration bisects the heart of GSENM twice a year, moving from summer to winter range and back. Based on this data, the GSENM RMP should include management provisions that recognize and sustain connectivity along known corridors and associated habitats. (3) <a href="https://www.nfwf.org/sites/default/files/2020-09/Utah2020SAP.pdf">https://www.nfwf.org/sites/default/files/2020-09/Utah2020SAP.pdf</a> Identifying high priority areas for wildlife connectivity allows land managers to focus on locations with elevated conservation value. Among the top habitat types to protect to maintain the integrity and functionality of migratory habitats throughout the GSENM are crucial seasonal habitat blocks, high-use migration corridors, stopover habitat sites, birthing grounds, areas utilized by multiple herds and/or species, and travel bottlenecks.4 This spatial data is available upon request from the state of Utah's Division of Wildlife Resources. In order to maintain the integrity and functionality of these priority habitats, the GSENM RMP should include specific management plan components for wildlife that limit disturbance and habitat alternations. Additionally, we recommend prioritizing the maintenance or restoration of undisturbed blocks of core habitat, migration corridors, and associated stopover habitat sites throughout the Monument, to provide functional security, abundant forage and cover migrating species to move throughout the landscape. (4) See Sawyer, H., M. J. Kauffman, R. M. Nielson, and J. S. Horne. 2009. Identifying and prioritizing ungulate migration routes for landscape-level conservation. Ecological Applications 19:2016-2025	Pew Comments-GSENM Scoping-9-27-22.pdf
Feinberg	Jackie	The Pew Charitable Trusts	Fish and wildlife; general	New technologies, such as GPS-enabled collars that allow researchers to track animal movements in real time, have dramatically enhanced knowledge about the movement characteristics of big game species, including the length and location of migration routes throughout the state of Utah. The seasonal movement of big game species, such as mule deer, is a critical component of their life history that allows them to access seasonally available forage, escape inhospitable weather or climate, and search out mates. Migratory ungulates require intact landscapes to maintain robust population levels. Land use changes, development, and habitat fragmentation impact these ancient corridors in myriad ways, and once these routes are lost or bi-sected they are exceedingly difficult to restore.	Pew Comments-GSENM Scoping-9-27-22.pdf
Miller	Scott	The Wilderness Society	Fish and wildlife; general	Similarly, the second figure (below) depicts the ecological integrity of lands at the scale of the contiguous United States (along with a regional excerpt) and the monument. Ecological integrity is an important and useful concept for guiding land conservation, as it emphasizes the importance of natural ecological processes in providing for biological diversity and resilience, for example. (10) Places that are ecologically intact and are maintained in a natural condition with minimal influence by human impacts or management are wilder than those with degraded ecological conditions and a high degree of human influence. The map relies on a high-resolution dataset measuring the degree of human modification and ecological integrity. Unsurprisingly, throughout the GSENM the ecosystems have relatively high degree of integrity compared to other landscapes across the contiguous United States. Protecting the ecological integrity of the lands within the monument has substantial regional and national significance. And even among the high degree of ecological integrity found within the monument, there are landscapes that boast the highest degree of ecological integrity, as shown in the lower right hand corner of the figure. (10) Parrish JD Braun DP Unnasch RS 2003. Are we conserving what we say we are? Measuring ecological integrity within protected areas. BioScience 53 851 860. See PDF for Grand Staircase - Escalante National Monument - Resource Management Plan - Ecological Integrity Map	GSENM TWS Scoping Supplement 2022.docx

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Miller	Scott	The Wilderness Society	Fish and wildlife; general	The embedded maps below help depict the national, regional, and local significance of the wildlife connectivity and ecological integrity values of GSENM. For the local perspective, the maps depict GSENM's most important lands (top 20%) for maintaining connectivity for wildlife and ecological integrity. The first figure below depicts the importance of the GSENM as part of a national network of connected landscapes demonstrated by the modeled flow of wildlife. The maps are compiled from various layers and datasets, and collectively depict the importance of wildlife paths across the country, region, and monument as species continue to adapt to climate change and its impacts. Because connectivity model outputs are very sensitive to the locations of habitats, patches, or protected areas to be connected, scientists have developed "coreless" connectivity models. These models use wall-to-wall or omnidirectional circuit theory to identify impeded, diffuse, or concentrated flows across landscapes to identify locations across the landscape that can facilitate movement and to locate critical concentrations of potential movement. The model is intended to identify the needs of many species based on the assumption that human modification will impede movement of organisms. The model is based on data from continental assessments based on omnidirectional connectivity focused on connecting the most natural lands to other natural lands (i.e., pixels with lower human modification). As a result, the national and regional connectivity maps tell a broader story of the importance of the GSENM in playing an important role in preserving wildlife habitat at a broader regional and national scale. The map of GSENM depicts the highest value lands within the monument identified by applying the model to the footprint of the monument. We believe this information and data would be a helpful addition for BLM to consider throughout the ongoing planning process. See PDF for Grand Staircase - Escalante National Monument - Resource Management Plan - Connectivity Map	GSENM TWS Scoping Supplement 2022.docx
McCoy	Melissa	U.S. EPA Region 8	Fish and wildlife; general	Identify and quantify other wildlife species that might be directly, indirectly, or cumulatively affected by each alternative and mitigate impacts to these species.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Campbell	Todd	University of Tampa	Fish and wildlife; general	Cattle are currently permitted to graze by lease on the majority of GSENM land with the exception of a few areas. Cattle can and have been the cause of contaminated water in the national monument as is currently the case in two locations: the Rock Creek-Mudholes, and Vermilion. The water in these areas have been confirmed to have water contaminated within an unacceptable range by grazing cattle. Clean water is particularly important to the amphibians of GSENM, as amphibians cannot survive without easy and consistent access for hunting, staying moist (which means life or death for amphibians), and for reproduction. Amphibians have semi-permeable skin which is very absorptive so they can absorb water and breathe through their skin, even while submerged. However, this also means it can absorb elements in the water that might hurt or kill them if the water is dirty. Amphibians also lay jelly-like eggs which are delicate and will dry out unless fully submerged in clean water. Dirty water is not the only threat to amphibians from grazing cattle. Many toads, snakes, and lizards use burrows as shelter to hide from the sun, natural disasters, or predators. Sadly, these life-saving burrows can be easily disturbed or collapsed by passing cattle. Some, like the endangered boreal toad, can live in these holes for most of the year, emerging only during rainstorms or to breed. The endangered desert tortoise will spend about 98% of its life (BLM) in its burrow, where it will hibernate for parts of the year. A collapsed burrow is the removal of an essential resource for reptiles and amphibians may mean a death sentence for its inhabitants. Bureau of Land Management. The Threatened Desert Tortoise. <a href="https://www.blm.gov/sites/blm.gov/files/documents/Nevada_SNDO_Desert_Tortoise_Fact_Sheet_0.pdf">https://www.blm.gov/sites/blm.gov/files/documents/Nevada_SNDO_Desert_Tortoise_Fact_Sheet_0.pdf</a> .	N/A
Campbell	Todd	University of Tampa	Fish and wildlife; general	Desert bighorn sheep and mule deer are both large game animals that are native to GSENM. When considering preservation of the GSENM through a management plan it's important to consider these animals as they are part of what makes this monument special. The most relevant threats to their population are caused by domestic farm animals and the fencing used to corral them. Desert bighorn sheep became extirpated and then reintroduced to the GSENM. Since then, their population has grown to nearly 3000 across 13 individual herds.(bighorn sheep unit management plan) Mule deer on the contrary exist in large numbers and migrate through the park each year. The sales of hunting tags on each of these animals is responsible for a large amount of money that is then used to manage, grow, and maintain these animals and other aspects of the GSENM. If this park becomes over recreated due to a lack of designated management zones and protected areas, both of these species could see a decline in numbers. Although both populations of mule deer and desert bighorn sheep are healthy and appear to be either growing or stable, they are faced with possible threats. Threats to bighorn include competition amongst cattle for grazing space and disease carried by domestic sheep. The main threat to mule deer are cattle fences. Since mule deer are highly migratory long swaths of cattle fence often leaves them lost, or leads them to a major road where they are forced to interact closely with vehicles. (Udot nd Partners Work Together to Protect Paunsaugunt Mule Deer Herd). UDOT 2014. Udot and Partners Work Together to Protect Paunsaugunt Mule Deer Herd. <a href="https://www.udot.utah.gov/connect/2014/09/22/udot-and-partners-work-together-to-protect-paunsaugunt-mule-deer-herd/">https://www.udot.utah.gov/connect/2014/09/22/udot-and-partners-work-together-to-protect-paunsaugunt-mule-deer-herd/</a> . Alternative D seems to be the best for all parties involved as it includes a fair o mount of discretionary recreation whilst preserving areas as deemed necessary, and allowing whose it may concern to alter grazing plots. D mentions that any grazing will be limited to grazing permits that facilitate restoration or protection of the GSENM. In this case if grazing zones and permits were allotted so that sheep and cattle grazed away from bighorn herds, and cattle fencing allowed easy passage for migrating mule deer, any current threats would be diminished. Though most populations in question are stable or growing ,not all are. These animals are key to preserving the natural aesthetic of the GSENM. To optimize money Mande from hunting permits, and revenue from tourists that may be attracted by bighorn sheep. The largest healthy population of these animals should always be prioritized. Bighorn Sheep Unit Management Plan   Kaiparowits - Utah. <a href="https://wildlife.utah.gov/pdf/bg/plans/bighorn_kaiparowits.pdf">https://wildlife.utah.gov/pdf/bg/plans/bighorn_kaiparowits.pdf</a> .	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Campbell	Todd	University of Tampa	Fish and wildlife; general	Humans are also the cause of many collapsed burrows. The current management plan fails to adequately protect and prevent damage of the monument's amphibians and reptiles from human disturbance. As it currently stands, anyone can access the vast majority of GSENM with many different types of vehicles which, combined with the lack of managed roads in the monument, can cause huge unintentional damage to reptile and amphibian populations. Human visitors are also potential vectors of disease. Endangered boreal toads and other amphibians are particularly susceptible to the easily transmitted chytrid fungus which grows over and covers their semi-permeable skin, making it thick and dry. An amphibian infected with the chytrid fungus will not recover, and their heart will be unable to beat due to a lack of electrolytes and water being blocked from entering their bodies through their skin. The chytrid fungus is currently decimating amphibian populations globally and can be spread to new areas such as GSENM by being carried on the shoes and vehicles of humans walking and driving through essential habitats. Visitors can also harm the desert tortoise population by picking them up which has been known to cause the tortoises to urinate and lose the precious water it had stored in its body, leading to a slow death by dehydration. Unsupervised visitors may also illegally pick up and take home hatchling desert tortoises as pets, further endangering the species.	N/A
Campbell	Todd	University of Tampa	Fish and wildlife; general	Lastly, GSENM has little in the way of management of its natural habitats under the current plan, though riparian habitats have been stated to be a high priority. However, riparian habitats are completely essential to the amphibians of GSENM, and there are certain features of riparian zones which are ideal for different species of frogs, toads, and salamanders. Preserving these habitats is beyond critical. Additionally, species of reptiles living in the monument, such as the chuckwalla, are mostly herbivorous and a healthy assortment of vegetation is essential for their diet. There are currently no protected areas in GSENM with the specific purpose of being preserved as an ideal habitat in which certain species can live.	N/A
Campbell	Todd	University of Tampa	Fish and wildlife; general	Now when it comes to which alternative seems the best for the protection and management of the aquatic species it seems that D is one of the better ones. One big reason is the total management of grazing in all areas of the monument. Some alternatives before mention management of grazing at low to none which goes back to one of the main issues that will devastate populations in the river. The cracking down on non-permit grazing areas is perfect to prevent any unethical or superior environment devastating conditions to be anywhere near the rivers and fish. Also, in the vegetation section of the alternative it mentions keeping control of native vegetation and trying to prevent growth of invasive species that may cause poor water quality and or loss of habitat. It's so important to protect these species and if there are alternatives that protect practices that harm them that would completely jeopardize the ecosystem in bigger ways than just the rivers.	N/A



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Campbell	Todd	University of Tampa	Fish and wildlife; general	<p>Pronghorn antelope and elk are both large game mammals that call GSENM home which is why they need to be considered when deciding how to use the land in the new management plan. While they are both found throughout Utah and North America, it is crucial that we keep them within GSENM to ensure the most natural preservation of the land. The biggest risks that they both face is habitat degradation due to invasive species and grazing, problems in migration caused by human activity and grazing, as well as added stress generated by increased human activity which could led to their permanent removal from the monument. The pronghorn antelope have already been extirpated from Utah twice in the past century due to habitat loss, excessive hunting, and poaching. Therefore, it is pertinent that every effort is made to preserve their population size within GSENM. As they are migratory animals, they require specified habitats depending on the time of year, and right now 82,900 acres of their habitat is within the decision area. Shrubs, forbs, and grasses are especially important to the pronghorn as these make up much of their preferred habitat and diet. (BLM, 2022). On the other hand, elk are more adaptable than the pronghorn due to the variability in their diet and habitat preference, but they are still worth considering in the new management plan to ensure their presence continues within the monument. Approximately 165,600 acres of their habitat is within the decision area which could affect their migratory patterns to different seasonal habitats. Similarly, to the pronghorn antelope, they rely heavily on shrubland habitats. (BLM, 2022). As these are both migratory animals, it is pertinent that their migration patterns are acknowledged in terms of necessary vegetation preservation for their range of habitats. The loss of shrubs within the monument has been observed in recent years due to the invasive plant species cheatgrass as well as fencing used for livestock grazing (UDWR, 2017). The cheatgrass is known to cause increased fire frequency in the shrublands while the livestock fencing takes up some of the shrub-land and creates barriers between migration routes and water sources (UDWR, 2017). The loss of shrub-steppe habitats reduces the monument's ability to properly provide for both species which makes vegetation management crucial to their presence in the monument. Utah Pronghorn Statewide Management Plan. Utah Division of Wildlife Resources, 2017. Additionally, pronghorn and sheep have been found to have a 67% overlap in their diets which means that they are competing for the same food source (UDWR, 2017). While cattle do not have much overlap in the diet of either mammal, they have been found to cause diseases in both. Specifically, they have been shown to transmit epizootic hemorrhagic disease (EHD) and bluetongue in both species (UDWR, 2017), as well as brucellosis and chronic wasting disease (CWD) in elk (UDWR, 2015). Utah Statewide Elk Management Plan. Utah Division of Wildlife Resources, 2015. With this being the case, the new alternative chosen needs to consider the effects of grazing, vegetation management, and increased human activity to ensure proper habitats and ideal conditions for these animals. If the pronghorn and elk were to be removed from the monument, certain predators such as coyotes or mountain lions would lose a critical food source which could lead them to deplete the populations of smaller mammals residing within GSENM. This could eventually cause a domino effect and the depletion of many more species populations within the park as everything currently residing in it has a certain role to maintain balance within the naturally occurring food chain. Their disappearance from the monument could also lead to an overgrowth of shrubs, forbs, and grasses which could in turn change the natural vegetation found within the park if they were to overrun it. Considering all of this, I believe that alternative D would be the most ideal in terms of pronghorn and elk habitat preservation because it looks to preserve the natural environment found throughout the monument while also allowing people to enjoy its preservation. While I believe that excessive human activity can be detrimental if not properly controlled, it ensures public interest and continued funding for the monument. Accordingly, the most important aspects that this alternative provides are limited recreational activities and grazing as well as natural vegetation management processes. Limited recreational activities would lessen human detriment within GESNM by providing the most natural and stress-free environment for the animals that inhabit it. OHV use and human activity both lead to increased stress for the animals due to increased noise and foot traffic as well as potential migration interruption if the animals were to deter their paths to avoid these interactions. OHV use can also be a huge factor in the loss of flat, shrubland and should be avoided within these areas under all circumstances. Additionally, limited grazing could ensure less migration interruption if some of the current fencings were to be removed. It could also ensure less disease transmission from livestock to pronghorn and elk as well as eliminate any food source competition for these mammals or further habitat degradation. Regarding vegetation, using natural processes and techniques would prioritize the vegetation already existing within the park, such as shrublands, and prevent the inhabitation of invasive species which could ensure shrubland conservation for the mammals that rely on that habitat. (BLM, 2022). Overall, alternative D would restore and preserve the most natural version of the park which would in turn conserve the plants and animals that depend on it and represent the monument as a whole.</p>	N/A
Campbell	Todd	University of Tampa	Fish and wildlife; general	<p>The Grand staircase national monument is also home to a large variety of small mammals. These include 24 rodent species, 2 rabbit species, 16 bat species, and other non-rodent small mammals such as, raccoon, weasel, ferret, and badger. This large variety of mammals inhabit many distinct parts of the GSENM, from burrows to caves to water. Populations of these small mammals would decline with an increase in human activity. Even though these species have varying habitats, it can be concluded that each species would suffer in some way due to human activity. Small mammals such as the prairie dog, kangaroo rat and pocket mice live in burrows in the ground. Large machines and people walking would ruin their homes. An increase in noise pollution will disorient the many bat populations. This disorientation will affect their ability to echolocate and therefore hunt for food. Designating plots of land for cattle will force burrowing mammals out of their homes. Cattle will also eat most of the vegetation, which is the primary diet for kangaroo rats (they eat grass seed) and prairie dogs, which also eat many plants as well as grasses. Like birds, I think alternative E would be best for managing small mammal populations. This alternative would manage cattle grazing for the allowance of vegetation management. Recreation activity would be limited, so therefore human activity would be as well. This alternative promotes the maintenance of soil wellness, which will allow for vegetation to thrive. Mammals-Of-the-Grand-StaircaseEscalante-National-Monument - A literature. <a href="https://bioone.org/journals/monographs-of-the-western-north-american-naturalist/volume-1/issue-1/1545-0228-1.1.1/--/10.3398/1545-0228-1.1.1.full">https://bioone.org/journals/monographs-of-the-western-north-american-naturalist/volume-1/issue-1/1545-0228-1.1.1/--/10.3398/1545-0228-1.1.1.full</a> <a href="https://www.allbryce.com/grand_staircase_national_monument/nature_wildlife.php">https://www.allbryce.com/grand_staircase_national_monument/nature_wildlife.php</a> <a href="http://www.zionnational-park.com/gsauna.htm">http://www.zionnational-park.com/gsauna.htm</a></p>	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Campbell	Todd	University of Tampa	Fish and wildlife; general	he current state of management for GSENM is decent but not ideal. Though the land is an area of many purposes, some purposes such as protecting life, must take precedence over others. Regarding an alternative management plan to the currently instituted one, Alternative A is decent but needs some additions to adequately protect GSEMN's reptile and amphibian inhabitants. This new Alternative includes the complete reduction of access to GSENM by grazing cattle in order not only to protect essential water sources which amphibians use or may use, but also to protect the burrows which reptiles, amphibians, and many other types of animals need to survive. Included in this Alternative would be the establishment or creation of designated protected areas for reptiles and amphibians within areas of interest. These areas include lands which may be ideal for breeding, where there is a population of endangered species, where there is ideal habitat for, or where there may come to be populations in the future. These protected areas would not allow access to vehicles, cattle, pack animals, or for walking unless a special permit is granted. These areas will also be closely and regularly monitored. This will not only protect current populations, but also work to ensure future generations will continue to call GSENM their home. The intentional preservation of reptiles and amphibians in GSENM is essential to maintaining a healthy ecosystem within the monument and for protecting rare species in danger of becoming extinct. All these species are valuable and essential not only for their value to science or the intrinsic value and beauty they have for merely being alive, but also for the rest of the animals in the monument to which the amphibians and reptiles double as both predator and prey. Amphibians and reptiles control insect and plant populations, while also providing a food source for larger animals. The burrows they create protect not only themselves but also provide shelter for other animals who cannot dig and rely on the reptiles and amphibians to create them instead. It is for these reasons that further steps must be taken to prevent their loss.	N/A
Campbell	Todd	University of Tampa	Fish and wildlife; general	When it comes to allowing cattle grazing within the GSENM, it would be impactful to bird populations. Cows eat a lot of vegetation. This vegetation loss would lower the greenery coverage for many ground-nesting birds. However, if effectively managed, cattle grazing can have good impacts on bird populations since they offer an increase in new vegetation growth and there would be an increase in water sources with cow farming. For these reasons, I think alternative E would benefit bird populations the most. An increase in human traffic, mining, and cattle grazing would disrupt bird populations to the point of no recovery, so it would be best to limit human activities. Soil is importantly managed in this alternative, so vegetation will grow and be able to provide coverage for birds. This alternative also offers controlled cattle grazing, which could possibly be beneficial to bird species if managed properly. Natural processes are favored in alternative E, which allows for the emphasis of natural conditions over others.	N/A
Lehi	Malcom	Ute Mountain Ute Tribe	Fish and wildlife; general	Ensuring safe Mule Deer migrations across highways Safe Mule Deer migrations across major highways within and adjacent to GSENM are an important interest of the UMU Tribe. The Paunsaugunt Plateau migration which spans nearly 100 miles should continue to be protected using crossing signals, overpasses, signage, and by ensuring that future development does not negatively impact this herd. Other wildlife corridors should be carefull identified to ensure these passages remain safe and intact for a variety of wildlife species. This is an area that I have a strong interest in participation	N/A
Walker	Joro	Western Resource Advocates (WRA)	Fish and wildlife; general	BLM Has a Further Duty to Safeguard and Restore Habitat Connectivity and Wildlife Corridors. As established above, BLM is obligated to protect ecological intactness directly as a Monument Object and Congressionally identified value and to safeguard Monument Objects and values dependent on ecological intactness. To fulfill this duty and other legal mandates, BLM must also consider and implement management measures that will ensure that the remote, intact habitats of the Monument and the greater region are interconnected and that the wildlife designated as Monument Objects and identified as of substantial value by Congress are unobstructed in their migrations and other movements within the larger landscape.	wra gsenm rmp scoping 9 18 2022.pdf
Fiebig	Michael	American Rivers	Special status fish and wildlife species	More than 200 species of migratory birds, including the at-risk Southwestern willow flycatcher and yellow-billed cuckoo rely on the Escalante River's riparian habitat. The Mexican spotted owl and peregrine falcon nest and hunt along its course, and the threatened Colorado River cutthroat trout lives in its higher elevation tributaries. The lower mainstem also supports the at-risk bluehead sucker, flannelmouth sucker, and roundtail chub.	GSENM Scoping Comments_American Rivers_DOI-BLM-UT-P010-2022-0006-RMP-EIS.pdf
Popejoy	Mike	Grand Canyon Trust	Special status fish and wildlife species	In addition, Sam Pollock Canyon (within proposed Hackberry Canyon unavailable area), Hogeye Creek and Snake Creek (within proposed Paria River unavailable area), Starlight Canyon, Bull Valley Gorge, and Fourmile Canyon include Mexican spotted owl Protected Activity Centers. Grazing has the potential to significantly degrade this important habitat for Mexican spotted owls (see Special Status Species section below for more detail). Ute ladies'-tresses (Spiranthes diluvialis), a Threatened species under the Endangered Species Act, occur in two of the above places: along Deer Creek from the Deer Creek Campground south to the narrows of Deer Creek Canyon, and along Henrieville Creek near the confluence of Shurtz Bush Creek. Proper protection of this Threatened species is an additional reason to allocate these areas as unavailable. Lick Wash contains an astonishing number of rare plants within its short 3.5 miles, including Paria breadroot (Pediomelum pariense), Lori's columbine (Aquilegia loriae), Zion fleabane (Erigeron sionis), Broadleaf gilia (Aliciella latifolia ssp. imperialis), Sand-loving penstemon (Penstemon ammophilus), Stella's evening-primrose (Oenothera cespitosa var. stellae), Canaan daisy (Erigeron canaani), and Kodachrome bladderpod (Physaria tumulosa), the last of which is listed as "threatened" under the Endangered Species Act. Proper protection of these species is an additional reason to allocate Lick Wash as unavailable.	Appendix B - RNA Proposals.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Special status fish and wildlife species	The fact that Mexican spotted owls may not have been observed throughout their designated critical habitat within the Monument should not be a reason to fail to provide adequate protection for these areas. It could be that lack of use by spotted owls is due to degradation of habitat resulting from existing land uses. The degradation of Mexican spotted owl designated critical habitat by cattle and recreation should be prevented. Regarding recreation, we have proposed management actions that are included in the Proposed Alternative Components section below. Regarding grazing, we are not aware of any differential grazing management within Mexican spotted owl designated critical habitat to ensure understory cover consistent with healthy foraging habitat for spotted owls. This should include upland areas within designated critical habitat, even if these do not occur in a PAC. The AMS states: "Habitat for special status species will be overlaid with land use allocations to describe potential impacts on species displacement or migration based on species tolerance. An analysis of discretionary uses that may be authorized under each alternative will be described in the context of how such uses tend to impact species." (AMS p. 6-27). We appreciate that this approach will be taken. Specifically in regard to Mexican spotted owls, this should include an analysis of all grazing allotments that include designated critical habitat, and a detailed look at specific grazing management provisions (e.g., utilization levels) that are consistent with healthy foraging habitat for spotted owls. In developing the alternatives and preparing the Draft EIS the Agency should also review the guidelines for grazing management included in the Mexican Spotted Owl Recovery Plan. NEPA requires the Agency to discuss means to mitigate adverse environmental impacts, and to include such mitigation measures in the development of alternatives. 40 C.F.R. §§ 1502.16(a)(9), 1502.14(e). To fulfill this requirement, when developing the land management plan and Draft EIS the Agency should fully consider approaches to managing livestock that will prevent further harm to MSO critical habitat and foster stable or increasing populations of MSO within the Monument.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Special status fish and wildlife species	Though nonbreeding birds have been observed, the fact that no nesting birds have been observed in this designated critical habitat (as far as we know) should not be a reason to fail to provide adequate protection for the area. It could be that nesting is not occurring due to degradation of habitat resulting from existing land uses. The designated critical habitat for southwestern willow flycatcher along the Paria River, which is also a Monument object, should be preserved, and degradation of this habitat by cattle should be prevented. As part of determining whether to keep an area available for grazing the Agency is to consider other uses for the land 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. BLM Land Use Planning Handbook, H-1601-1, Appendix C-14 (2005). Thus, we propose that southwestern willow flycatcher designated critical habitat be allocated as unavailable for grazing. The most practical way to implement this given current infrastructure would be to allocate the Gravelly Hills Pasture of Cottonwood Allotment as unavailable for grazing, as we recommend in the Rangeland Health and Livestock Grazing Management section.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Special status fish and wildlife species	Greater sage-grouse (Centrocercus urophasianus) is a BLM Sensitive Species and Utah Species of Concern. As a keystone species and sagebrush ecosystem obligate, it requires large, intact, interconnected expanses of sagebrush. Approximately 5,800 acres of priority habitat exists in the Skutumpah/Glendale Bench area (AMS p. 5-74). According to the Colorado Plateau Rapid Ecoregional Assessment near-term (2025) terrestrial habitat intactness model, habitat quality has been decreasing due to increased development in the ecoregion (AMS p. 5-17). Population trends are down 2.2% from 2020. To protect the species and habitat within GSENM, known lek sites should be protected from excessive grazing, recreation (motorized and non-motorized) and surveyed regularly. The AMS does not address grazing in this area, and we are not aware of any differential grazing management in this area to ensure understory cover consistent with healthy sage-grouse habitat.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Special status fish and wildlife species	Pronghorn have declined since the mid-19th century and may have disappeared from this area by the early 20th century. <sup>85</sup> The AMS acknowledges the decline in pronghorn and the efforts of UDWR and the Monument to improve their populations. UDWR has GPS collars on dozens of pronghorns that reside in or travel through the Monument. This data identifies important pronghorn travel routes through and within GSENM. We recommend the Monument collaborate with UDWR to monitor pronghorn to evaluate priority habitats, restoration opportunities and places where habitat needs greater protection from human disturbance. The Monument should also consider how climate change conditions including drought, smaller snow packs, and rising temperatures may impact needs for habitat protection.	Appendix B - RNA Proposals.pdf
J	A	N/A	Special status fish and wildlife species	ESA SPECIES: Include specific language about how you plan to protect special status species and T&E species. For example, firewood, post, and Xmas tree cutting should not be permitted in areas with these species. If thinning promotes habitat for ssp, then it can be achieved through intentional administrative project work so it can be properly documented. I don't see a need for any new trails on the monument, but any constructed should avoid SS and T&E species. Efforts should be made to relocate existing trails out of these areas as well.	GSENM_20220923.docx
Berry	Scott	N/A	Special status fish and wildlife species	Threatened and Endangered Species. The BLM is required to comply with the specific statutory and regulatory obligations with respect to threatened and endangered species. <a href="https://www.blm.gov/programs/fish-and-wildlife/threatened-and-endangered/state-te-data/utah">https://www.blm.gov/programs/fish-and-wildlife/threatened-and-endangered/state-te-data/utah</a> . " The BLM places a special emphasis on maintaining functioning ecosystems to benefit all wildlife and plants, and restoring habitat . " Under Proclamation 10286, the BLM is legally obligated to maintain the functioning ecosystems that support threatened and endangered species found in GSENM. To meet that obligation, the BLM will need to better understand the dynamic ecosystems at GSENM, and ensure that all management actions support that goal, by adopting and implementing the suggestions made in these comments.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Lish	Christopher	N/A	Special status fish and wildlife species	Threatened Mexican spotted owls, endangered Southwestern willow flycatchers, and pinyon jays need their habitat protected from grazing and clearcutting.	220926_doi-blm-ut-p010-2022-0006-rmp-eis_grand_staircase-escalante.pdf
Jackson	Thomas and Marilyn	Star Ranch LLC	Special status fish and wildlife species	Sage Grouse should not receive Federal protection -Utah opposed BLM's EIS for land plans to protect the greater sage-grouse. Representatives from Utah participated on a task force and a technical team that took an in-depth look at how to ensure sage grouse would not need federal protection, only to learn Environmentalists were seeking to use the sage grouse to oppose oil and gas development, mining and grazing, which were miles away from sage-grouse colony.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Special status fish and wildlife species	Table 5-9 We recommend that no "Potential" species be listed herein without photographic, eyewitness and documented proof. We refer the reader to the section herein labeled Endangered Species. Any species listed as "None" under Federal Status should be erased from the list. BLM is specifically using the term "BLM Status sensitive species" to delay and interrupt public access and use. A small population of any species in one area of GSENM does not adequately address the question of where else a population of this species exists in other states or countries, nor applies to the entire GSENM.	N/A

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Jackson	Thomas and Marilyn	Star Ranch LLC	Special status fish and wildlife species	We remind BLM that when plans for the recovery of the California Condor ( <i>Gymnogyps californianus</i> ) were implemented that Utah opted out of the agreements. It was called 'the establishment of a nonessential experimental population'. The geographic boundaries for the California Condor of the NEP were northern California, northwest Nevada, and Oregon. (Notice it's not a Utah Condor, and Utah is not listed!)	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Special status fish and wildlife species	US Fish and Game solicited comments regarding a "Potential" Endangered Species: Gierisch mallow in April of 2013 in Washington County. One of the factors about deformed life in Southern Utah is, no doubt, the long lasting effects of atomic blasting in Nevada and the prevailing 'downwinds' which altered life. Obviously, some of those genetically altered changes make it hard to explain reproduction problems. A film featured in Las Vegas' Ripley's Believe it Or Not, focused on a three-legged horse born in Delta, Utah. My family submitted pictures to Arizona Rep, Stuart Udall, of daisies with two stems, hairless calves, cats without fur on their ears. No one thought about listing them as endangered, nor would it have made any difference. This population of Gierisch Mallow is on Federal Land, where ample restriction already exists. Closing Gypsum mining was the conspicuous target of the campaign.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Special status fish and wildlife species	We recommend that populations of Utah Prairie Dog be quarantined to at least 15 miles from the nearest community boundary, or be removed to keep a 15 mile perimeter.	N/A
McCoy	Melissa	U.S. EPA Region 8	Special status fish and wildlife species	We recommend that BLM work closely with the U.S. Fish and Wildlife Service (USFWS) and the Utah Division of Wildlife Resources to determine potential impacts of the plan on plant and wildlife species, especially species classified as rare, threatened, or endangered on either state or federal lists. We also recommend that the Draft EIS: 7 See <a href="https://wildlife.utah.gov/pdf/WVAP/2021-10-sgcn-list.pdf">https://wildlife.utah.gov/pdf/WVAP/2021-10-sgcn-list.pdf</a> - Identify and quantify which species and/or critical habitat might be directly, indirectly, or cumulatively affected by each alternative and mitigate impacts to these species. Emphasis should be placed on the protection and recovery of species due to their status or potential status under the Endangered Species Act. - Discuss the RMP's consistency with existing laws and regulations, including the Migratory Bird Treaty Act. - Summarize, or include as an appendix in the Draft EIS, any biological assessment prepared by BLM after informal consultation or biological opinion prepared by USFWS after formal consultation. If applicable, demonstrate that the preferred alternative is consistent with the biological assessment or opinion. - Discuss mitigation measures to minimize impacts to special status species, describe the effectiveness of such measures to protect wildlife, and indicate how they would be implemented and enforced.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Campbell	Todd	University of Tampa	Special status fish and wildlife species	A second issue that arises from the management plan is the lack of consideration for the invasive species that come from Lake Powell and the Colorado River. Although mentioned there is no direct plan to deal with the invasive species leaching into areas like the Paria and Escalante River. To give some context when it comes to these invasive species, the Rainbow Trout is one of the biggest threats towards endangered species living in the rivers. Different organizations maintain their populations to keep the fishery business in the area at a substantially good condition. Yet the migratory patterns of the Rainbow Trout can ultimately lead them down into the rivers of the Grand Staircase thus causing a significant loss of native populations. Their breeding patterns are also very good in the river's conditions unlike the native Chubs which can only spawn in colder conditions. In an article it is also stated that "nonnative brown trout have expanded into the Lees Ferry... are predatory on rainbow trout and are known to have negative impacts on native fish downriver" (NPS 2022) Not only do you have the rainbow trout but the brown trout as well, two big forces to decimate the native populations of the rivers. If the rainbow trout migrates into the rivers of the Grand Staircase the brown trout will most likely follow. There needs to be a keen eye on the different populations present in the rivers and initiatives to help keep native species in good numbers and nonnative species in the low/nonexistent numbers. U.S. Department of the Interior. Nonnative fish. National Parks Service. September 14, 2022. Now the question arises, why is this issue so important. Well, it has to be taken into account that the fish population in the area is important in not only feeding other species that live in the area, land based or not, but also in managing the growth of different fauna. Every ecosystem has a food chain and when one piece of the web is eradicated it ultimately effects all the surrounding creatures. With less food sources predators of the fish will slowly die off and this will domino effect until it reaches the top predators of the area. A massive loss in species populations both aquatic and land based can and will occur if nothing is done. The future of the Grand Staircase will be a lot different in many negative ways with the issues' outcomes.	N/A
Campbell	Todd	University of Tampa	Special status fish and wildlife species	Grazing directly impacts this threatened species, including effects on diet, shelter, and migratory patterns. Sage grouse consume many different species throughout the year. Diets in the spring and summer (especially for chicks) include spiders and butterflies that are found in the sagebrush this bird resides in. Studies have proven that rested/deferred pastures from grazing host the more abundant arthropods important for sage grouse diets (Sage Grouse Initiative, 2022); a decrease in grazing will increase available resources for the sage grouse. Additionally, grazing will decrease the amount of sagebrush present, affecting shelter availability necessary for sage grouse and their chicks. Chick survival is correlated with grass height as they use taller grass for cover and protection until they're bigger and older (Barnett and Crawford 1994; Gregg et al. 1994; Connelly et al. 2004; Casazza et al. 2011). Lastly, as sagebrush obligates, adjacent habitats are necessary for this species' survival. They are seasonal migrators shifting around different areas for better food and shelter options as it gets colder in the winter (Connelly et al. 2004; Wisdom et al. 2011). Grazing sections can interfere with this movement throughout the ecosystem. Overall, a decrease in grazing or stricter rotation management of grazing lands can have a positive impact on this species regarding diet, shelter, and migratory patterns. Barnett, J. K. and J. A. Crawford. 1994. Pre-laying nutrition of sage grouse hens in Oregon. Journal of Range Management. 47:114-118. Casazza, M. L., P. S. Coates, and C. T. Overton. 2011. Linking habitat selection and brood success in greater sage-grouse. In: Ecology, Conservation, and Management of Grouse (B. K. Sandercock, K. Martin, and G. Segelbacher, editors). Studies in Avian Biology 39:151-167. University of California Press, Berkeley. Connelly, J. W., S. T. Knick, M. A. Schroeder, and S. J. Stiver. 2004. Conservation Assessment of Greater Sage-grouse and Sagebrush Habitats. Western Association of Fish and Wildlife Agencies. Unpublished report. Cheyenne, Wyoming. Gregg, M. A., J. A. Crawford, M. S. Drut, and A. K. DeLong. 1994. Vegetation cover and predation of sage grouse nests in Oregon. Journal of Wildlife Management 58:162-166. Wisdom, M. J., C. W. Meinke, S. T. Knick, and M. A. Schroeder. 2011. Factors associated with extirpation of sage-grouse. In Greater sage-grouse: Ecology and conservation of a landscape species and its habitats. Studies in Avian Biology 38:451-472. University of California Press, Berkeley.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Campbell	Todd	University of Tampa	Special status fish and wildlife species	The Greater sage grouse ( <i>Centrocercus urophasianus</i> ) is a bird found in sagebrush habitats through the western regions of North America. Currently, the range includes multiple states in America however they are currently threatened by habitat disruption and human development. This species' importance and protection are vital to any management plan proposed for GSENM. While this keystone species has been classified under ESA protection since 2010, overall populations have declined since 2015 (UDWR, 2022). A decline in this species will have a cascade effect on the ecosystem. Multiple studies have shown that conservation efforts aimed at the sage grouse help up to 350 other species in the sage grouse habitats including plants, invertebrates, amphibians, reptiles, birds, and mammals (Sage Grouse Initiative, 2022). Utah Department of Wildlife Resources (UDWR), 2022. Sage Grouse Initiative -Wildlife Conservation Through Sustainable Ranching. 2022. Public Land Partnership <a href="https://www.sagegrouseinitiative.com/public-land-partnership/">https://www.sagegrouseinitiative.com/public-land-partnership/</a>	N/A
Campbell	Todd	University of Tampa	Special status fish and wildlife species	Of the 200 species of birds, 2 are in decline, the Long-billed curlew and Blue Grosbeak Ferruginous, and one is endangered, the Southwestern Willow Flycatcher. Of the 22 raptor species, the Peregrine Falcon and California condor are both endangered and the bald eagle is threatened. Populations of the Burrowing Owl, Northern Goshawk and Swainsons hawk are in a decline. Special populations would further decline if more human activity occurred. While habitat type range between birds, most tend to either nest on the ground or up in trees. An increase in foot and machine traffic would harm nesting areas for birds. Trees would be knocked down to make way for large machinery and the ground would be torn up as these large machines reach their destination. Once mining excavators are put into the ground, the noise will continue to frighten birds. This will expend their energy, because they are using it to fly away rather than hunt for food.	N/A
Popejoy	Mike	Grand Canyon Trust	Hydrology	In this dry setting water is an essential resource to sustain life for people, plants and wildlife. Proclamation 6920 notes the "scarce and scattered water sources" of the Monument and directs the Secretary "to address in the management plan the extent to which water is necessary for the proper care and management of the objects of this Monument." Proclamation 10286 also describes riparian ecosystems, hanging gardens, rivers and streams as Monument objects. Water is of particular significance and concern to Tribes. Tribes should be consulted and the cultural significance of water sources and associated ecosystems should be considered in all planning level and project level decisions.	Appendix A - Figures & Tables.pdf
Spotts	Richard	N/A	Hydrology	Cattle should be effectively excluded from access to all rivers, streams, springs, and seeps and associated aquatic, wetland, and riparian habitats. These habitats are incredibly rare and precious, and rapidly declining due to climate change and the exceptional drought. Many ESA and other special status species rely on these habitats for their survival.	N/A
Sjogren	Morgan	N/A	Hydrology	The condition of the springs within the monument needs to be surveyed and monitored.	40 Mile Gulch _ 2 May 2020.pdf
Sjogren	Morgan	N/A	Hydrology	Water withdrawals for irrigation and livestock can affect riparian, aquatic, and terrestrial ecosystems and water quality. The BLM should consider acquiring water rights at streams, springs, and wetlands where there has been significant dewatering or damage to wetland ecosystems so that they can begin to recover.	40 Mile Gulch _ 2 May 2020.pdf
Berry	Scott	N/A	Hydrology	iii.With respect to water rights, GSENM should investigate and quantify the volume of water (surface and subsurface) traversing GSENM at the time of its establishment in 1996, and put the State of Utah on notice with an appropriate filing as to its right to continue to receive that volume of water in the future, and challenge any claim to water rights junior to that filing that would result in diminishment of flows within GSENM. iii. In addition, GSENM should seek to negotiate with tribal nations an opportunity to use tribal water rights (Winters Doctrine) at GSENM on a mutually agreed upon basis.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Berry	Scott	N/A	Hydrology	iv. Complete an inventory of seeps springs located within GSENM. Sabata, NAU Thesis, 2018, " An Analysis of Culturally Significant Plants, Springs and Archaeology at Grand Staircase Escalante National Monument."	RAD Management (2).pdf
Sjogren	Morgan	N/A	Hydrology	This is the worst area-wide drought in the last 1200 years. I have seen the water in rivers, creeks, springs, and potholes diminish radically in the last five years. These conditions are challenging and daunting for hikers, and routes must be meticulously planned around water in addition to carrying heavy loads.	40 Mile Gulch _ June 2018.pdf
Berry	Scott	N/A	Hydrology	Adopt and implement the Resistance-Acceptance-Direction model for understanding and responding to hydrology issues and concerns at GSENM. Management Foundations for Navigating Ecological Transformation by Resisting, Accepting or Directing Social-Ecological Change , Magness, et. al. In addition, incorporate the best high quality climate science into the R-A-D model. This model should be used to shape and inform GSENM management policies and decisions with respect to hydrological concerns. Hydrology cannot be divorced from the implications of accelerating climate change.	RAD Management (2).pdf
J	A	N/A	Hydrology	AQUATIC: Please don't forget about the aquatic species and water quality in this plan. Promote and restore healthy riparian habitat throughout GSENM. Maintain and preserve aquatic connectivity through land acquisition and maintenance of instream flows and by removal of barriers where practicable. Don't let OHVs drive in washes with perennial or intermittent flow. Ensure groundwater pumping is not damaging monument objects and that surface water ecosystems are functioning and supporting native flora and fauna. Work to understand stream channel morphology, the geomorphic-riparian vegetation feedback within each reach of each waterway and ensure persistence of long-term ecologic function appropriate for each reach. Assess spring condition of every spring every 5-10 years. Ensure water rights uses are not damaging monument objects.	GSENM_20220923.docx
J	A	N/A	Hydrology	WATER: I want to see a lot of language about water resources, and not just in terms of recreation and visitor facilities. With a changing climate, more drought, and more demand for water resources in the future, you need to articulate how you will protect water resources. I want you to demonstrate your understanding of riparian habitat, wetland importance, hydraulic connectivity, ecosystem resiliency, and water resources protection. Show me the science. And hopefully this goes without saying - no allowances for bottling water by commercial entities and no new water development in GSENM. Has there been an inventory of "isolated water resources" and will you include explicit language about how you plan to protect these for wildlife by restricting recreation and stock development in these areas?	GSENM_20220923.docx
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Hydrology	Hydrology (Groundwater, Surface Water, Wetlands, Riparian Areas, Floodplains, and Water Quality): The Navajo Nation has a strong interest in the management of water resources in Southern Utah and requests that the NEPA analysis consider the ecological implications of changes or newly exercised water rights in the basin. Springs, seeps, and waterways are culturally important to Navajo people, so in addition to being managed for water quality, riparian health, etc., these resources should also be managed for cultural resource values.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Snyder	Shannon	U.S. EPA Region 8	Hydrology	Impacts to Impaired Waterbodies Several waterbodies in the planning area are included on the most recent EPA-approved CWA Section 303(d) list and are impaired for pollutants such as temperature, dissolved oxygen, TDS, selenium, macroinvertebrates, and boron. We recommend the BLM (a) analyze each alternative's potential impacts to impaired waterbodies within and/or downstream of the planning area, including waterbodies listed on the 303(d) list, and (b) coordinate with Utah DEQ if there are identified potential impacts to impaired waterbodies (in order to avoid causing or contributing to the exceedance of water quality standards). Where a TMDL exists for impaired waters in the area of potential impacts, pollutant loads should comply with the TMDL allocations for point and nonpoint sources. Where new loads or changes in the relationships between point and nonpoint source loads are created, we recommend that the BLM work with Utah DEQ to revise TMDL documents and develop new allocation scenarios that ensure attainment of water quality standards. Where TMDL analyses for impaired waterbodies within, or downstream of, the planning area still need to be developed, we recommend that proposed activities in the drainages of CWA impaired or threatened waterbodies be either carefully managed to prevent any worsening of the impairment or avoided altogether where such impacts cannot be prevented.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
McCoy	Melissa	U.S. EPA Region 8	Hydrology	Springs, Wetlands and Riparian Areas We recommend the Draft EIS provide inventories and maps of existing wetlands and waters of the U.S. within the planning area, including waters that are regulated under Section 404 of the CWA and wetlands that are protected under Executive Order 11990 - Protection of Wetlands (May 24, 1977). We suggest including any available information on acreages and channel lengths, habitat types, values, and functions of these waters. We recommend that the BLM describe potential impacts to wetlands and riparian areas that could occur due to management activity under the RMP, including impacts associated with the following: - Activities sited within waters. - Activities in areas adjacent to waters that could affect stream structure, instream habitats and channel stability. - Activities in areas adjacent to waters that could alter sediment supply and result in deposition of fine sediments on the streambed, including in spawning habitats. - Activities in areas adjacent to waters that could affect riparian vegetation and habitat corridors. - Activities in areas adjacent to waters that could affect water quality and aquatic biota. BLM-authorized activities in the planning area, including grazing, roads and trails, recreation, and construction activities, have the potential to cause changes in hydrology due to surface disturbance, compaction and increased run-off. These changes in hydrology may result in stream structure failure and additional sediment loading to streams, wetlands and riparian areas. We recommend including a list of potential avoidance measures, mitigation requirements and best management practices (BMPs) that may be applicable at the project level for grazing, roads and trails, recreational activities, and construction, to prevent adverse impacts to these aquatic resources. These measures could include setbacks, silt fences, detention ponds and other stormwater control measures. We recommend the Draft EIS include a requirement for delineation and marking of perennial seeps, springs, and wetlands on maps and on the ground prior to project level development to ensure identification of these resources to facilitate their protection.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
McCoy	Melissa	U.S. EPA Region 8	Hydrology	Aquatic Resource Characterization We recommend the Draft EIS provide a complete hydrologic characterization of the planning area. There are many important aquatic resources within the planning area, including the Escalante and Paria Rivers, their tributaries and associated riparian areas, as well as wetlands, seeps and hanging gardens dispersed throughout the monument area. The AMS notes that there are approximately 7,000 miles of streams and washes, 97% of which are ephemeral or intermittent. Ephemeral streams provide important functions within the stream network, particularly in arid areas where they make up the vast majority of stream miles within a watershed. Protection and/or restoration of these resources can have numerous beneficial effects on the integrity of downstream intermittent and perennial waters. The AMS also notes that in 2022 41% of the assessment units within the decision area are classified as impaired and failing to meet water quality standards and lists those assessment units and the causes of impairment (p. 5-80). This information stresses the importance of a robust hydrological baseline analysis of surface water in the planning area that includes: - A description of current water quality conditions and trends for surface waterbodies within the planning area, including intermittent, perennial, and ephemeral streams, rivers, lakes, reservoirs, and surface water drinking water resources. We recommend comparing existing conditions to existing water quality standards or other reference conditions. - A map and summary of project area waters, including streams (perennial, intermittent, and ephemeral), lakes, springs, and wetlands. It would be helpful if the summary identified high resource value waterbodies and their designated beneficial uses (e.g., agriculture, fisheries, drinking water, recreation). - Types, functions and acreages of wetlands, riparian areas, and springs. - Identification and maps of riparian areas within the watershed that are in Proper Functioning Condition (PFC), functioning at risk, and nonfunctional. - Watershed conditions, using aquatic and terrestrial physical and biological indicators including stream channel/stream bank shape, stability, and function; vegetation cover and composition; soil productivity and erosion; native and invasive species occurrence; and density and location of roads and trails. - Maps of topography and soils, specifically steep slopes and fragile or erodible soils near surface waters, including intermittent and ephemeral channels. - Generalized maps depicting the location of sensitive groundwater resources such as sole source aquifers (available from the EPA Sole Source Aquifer website at <a href="https://www.epa.gov/dwssa">https://www.epa.gov/dwssa</a> ), sensitive aquifers, shallow aquifers, and recharge areas. - A map and list of the most recent EPA-approved list of Clean Water Act (CWA) impaired or threatened water body segments within, or downstream of, the project area, including the designated uses of the waterbodies and the specific pollutants of concern. The Utah Department of Environmental Quality (DEQ) can identify or validate any CWA Section 303(d) listed waterbodies potentially affected by Monument uses and activities.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Pollock	Leland	Garfield County Commission	Hydrology	Due to the desert climate combined with the current drought, water quantity is a major concern for Garfield County. While we have no control over the timing and frequency of precipitation, we do have control over certain management efforts which can enhance water quantity and quality. Garfield County recommends that the monument make efforts to improve riparian and upland vegetation by identifying and removing the invasive Russian Olive and the encroaching Pinyon & Juniper trees. The mechanical reduction of Pinyon & Juniper along with seeding in other areas of Garfield County conducted by the Forest Service and BLM in conjunction with the Watershed Restoration Initiative have resulted in improved water quantity, quality, and soil stabilization. We recommend that the monument significantly increase implementation of projects to improve vegetative cover, stream bank stabilization, water retention, and eradication of undesirable invasive/encroaching species.	Garfield County Commission.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Groundwater	Excessive pumping of groundwater is a concern, particularly with climate change and reduced rainfall that is happening and predicted. The AMS states that in the decision area the "vast majority of BLM water rights are point to point stock watering rights" (p. 5-84). Groundwater pumping for livestock has the potential to reduce spring flows and negatively impact hanging gardens and wetlands associated with springs. The impacts of groundwater pumping on Monument objects needs to be studied and where Monument objects are being harmed then reducing groundwater extraction needs to be considered	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Groundwater	Goal 1 Ensure that groundwater pumping is not damaging Monument objects including aquatic, wetland and terrestrial organisms. Objectives - Assess the impacts of groundwater pumping on springs, streams and wetland ecosystems.	Appendix D - Alternative Components.pdf
Sjogren	Morgan	N/A	Groundwater	Groundwater pumping for livestock has the potential to reduce spring flows and negatively impact hanging gardens and wetlands associated with springs. Groundwater pumping needs to be studied and reduced or prohibited when it impacts monument objects.	40 Mile Gulch _ June 2018.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Groundwater	install new water facilities needed to protect and propagate wildlife during periods of drought.	GSENM RMP Scoping Comments 27SEPT2022.pdf
McCoy	Melissa	U.S. EPA Region 8	Groundwater	Groundwater Groundwater is an important resource since it provides domestic and public water supply and supports environmental flows and levels in groundwater dependent ecosystems (GDEs). The primary aquifers in the planning area include the Colorado Plateau aquifers, the Glen Canyon regional aquifer system, and the Mesa Verde, Dakota, Morrison and Entrada-Preuss aquifers. GDEs include fens and other wetlands fed by groundwater, terrestrial vegetation and fauna sustained by shallow groundwater, ecosystems in streams, lakes fed by groundwater, and springs. While GDEs occupy a small percentage of landscapes in the West, riparian areas and GDEs provide disproportionately large ecosystem services such as water filtration, wildlife habitat, and flood control. Shallow aquifers are typically unconfined, and those that are in communication with the surface can be sensitive to contamination from surface activities. BLM management practices and authorized activities have the potential to impact GDEs by altering surface run-off, infiltration, evapotranspiration, sedimentation, and soil compaction. Shallow aquifers and their sensitivity to contamination should be taken into consideration when deciding on allowable actions in source water protection zones, or in proximity to domestic or stock wells. To ensure that activities authorized under the RMP are protective, it is important to characterize both the existing and potential groundwater drinking water resources in the planning area. We recommend the Draft EIS include the following information: - A description of all aquifers in the study area, noting which aquifers are Underground Sources of Drinking Water (USDWs). Federal Safe Drinking Water Act regulations define a USDW as an aquifer or portion thereof: (a)(1) which supplies any public water system; or (2) which contains a sufficient quantity of groundwater to supply a public water system; and (i) currently supplies drinking water for human consumption; or (ii) contains fewer than 10,000 mg/l total dissolved solids; and (b) which is not an exempted aquifer (See 40 CFR Section 144.3). - Water quality and water yield information from each aquifer, if available. - Generalized maps depicting the location of sensitive groundwater resources such as municipal supply watersheds, source water protection zones, sensitive aquifers, groundwater dependent ecosystems, and recharge areas. - Descriptions and locations of groundwater use (e.g., public water supply wells, domestic wells, springs, and agricultural and stock wells).	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
King	Catherine	Utah Native Plant Society	Groundwater	Excessive pumping of groundwater is a serious concern, particularly with climate change and reduced rainfall that is happening and predicted. Groundwater pumping for livestock has the potential to reduce spring flows and negatively impact hanging gardens and wetlands associated with springs. The impacts of groundwater pumping on monument objects needs to be studied and where monument objects are being harmed then reducing groundwater extraction needs to be considered Many riparian areas in the monument are negatively impacted by livestock and some are extremely degraded. The Gulch is an example of a place where UNPS is concerned with the negative impacts from livestock to the riparian vegetation, even though it is currently designated as an outstanding natural area. In order to facilitate recovery of the riparian area (and stream), The Gulch should be made unavailable to livestock as recommended in the Grazing section.	UNPS on GSENM 2022 (1).docx
Popejoy	Mike	Grand Canyon Trust	Surface water	Greater effort needs to be made to protect and restore the small but important surface water Monument objects. That can include reduction or exclusion of livestock from some streams, riparian areas and floodplains.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Surface water	We have observed disturbances at springs from water diversion (capture, piping and storage of water), trampling by livestock, trails by animals and people, and excavation (for water livestock water supply) all of which can accelerate damage such as erosion, loss of riparian vegetation and in some cases weed invasion. Examples of springs described in the Springs Stewardship Institute report as poor ecological condition and high ecological risk were Little Fin (Fig. 2), Mossy Del (Fig. 3), Neaf, Lower Seaman and Round Valley Seep. Those springs need actions that facilitate recovery such as protection from livestock. Examples of springs they describe as relatively good condition but with significant restoration potential include Pinnacle Cienega (Fig. 4), Yellow Cabin Spring and Vespider Meadow Spring.	Appendix A - Figures & Tables.pdf
Shu	Lyn	Highway 84 LLC	Surface water	Storing water in ponds, reservoirs and lakes makes great recreation. We strongly urge BLM to do every thing in their power to develop the North Creek Watershed near Escalante. It's our understanding that they have plans for cleaning out one reservoir and making a second one there. This would not only help cattle and wildlife habitat, but create new recreational opportunities.	N/A
Alderson	George and Frances	N/A	Surface water	The new plan should take a closer look at the impacts of ORVs traveling in streams and washes, where they may be damaging riparian wildlife habitat. Elsewhere in southern Utah we have seen ORV routes that run in stream valleys lined with willows and cottonwoods, where the vehicles trample natural vegetation and make long water crossings where the vehicles create a mudhole and leave the pollution of engine oil on the water. Any such routes in GSENM should be closed in the new plan.	N/A
Sjogren	Morgan	N/A	Surface water	The river (Escalante and Paria) and stream (Deer Creek, Calf Creek, Sand Creek, Buckskin Gulch, Willis Creek, and others) are listed as monument objects in proclamation 10286 but many of these areas and aquatic habitats are not in ideal condition and are affected by woody invasives, eroding streambanks, irrigation diversions, livestock grazing, mining and recreation. The protection and management of these waterways, especially in light of the severe drought across the west, needs to be an area of primary attention and concern when formulating the RMP.	40 Mile Gulch _ June 2018.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
King	Catherine	Utah Native Plant Society	Surface water	Springs, where groundwater emerges, sustain numerous uncommon, endemic or rare plants and animals in the monument. Springs have been important to societies in both the distant and recent past as well as the present. Springs are vulnerable to disturbance from human activities such as livestock grazing, groundwater pumping and diversion of water. Greater effort needs to be made to protect and restore the small but important surface water monument objects. That can include reduction or exclusion of livestock from some streams, riparian areas and floodplains.	UNPS on GSENM 2022 (1).docx
Popejoy	Mike	Grand Canyon Trust	Wetlands	The concept of wetlands often includes areas with flowing water (lotic) like springs and riparian areas, which are also discussed in this section. Wetlands with standing water (lentic) are few and far between in the Monument. The few wetlands that exist on the Monument need to be better protected and allowed to recover if they have been degraded by human activities, such as livestock grazing. For example, Pinnacle Cienega (Fig. 4) is a wetland documented in the Springs Stewardship report that is a large (over 7 acres) and negatively impacted by cattle; the report suggests "fencing the cienega (or a portion thereof) to reduce cattle trampling and site impairment." Such fencing is an example of management action that can protect and restore Monument objects.	Appendix A - Figures & Tables.pdf
King	Catherine	Utah Native Plant Society	Wetlands	Areas with water in GSENM are very important to plants and wildlife. These areas need to be protected and restored if they are in poor condition	UNPS on GSENM 2022 (1).docx
Popejoy	Mike	Grand Canyon Trust	Riparian areas	Many riparian areas in the Monument are negatively impacted by livestock and some are extremely degraded. The AMS describes data from riparian PFC 97 assessment and notes that 23 percent of riparian sites were functioning at risk with no apparent or a downward trend. That means that more than 1 in 5 riparian areas are functioning at risk. The Gulch is an example of a place where we are concerned with the negative impacts from livestock to the riparian vegetation, even though it is currently designated as an outstanding natural area. In order to facilitate recovery of the riparian area (and stream) of The Gulch, we are proposing that it be made unavailable livestock grazing (see Rangeland Health and Livestock Grazing Management section). 97 U.S. Department of the Interior. 2015. Riparian area management: Proper functioning condition assessment for lotic areas. Technical Reference 1737-15. Bureau of Land Management, National Operations Center, Denver, CO.	Appendix A - Figures & Tables.pdf
Sjogren	Morgan	N/A	Riparian areas	I have witnessed Cattle in and around springs, like those I described earlier in 40 Mile Gulch, which leaves these beautiful sources of life littered with cow pies and decimating the riparian plant communities. No livestock should be allowed near the source of springs.	40 Mile Gulch _ 2 May 2020.pdf
Eaton	Marietta	N/A	Riparian areas	At the very least, what will BLM do to ensure that the riparian areas (<2% of GSENM) are not damaged by livestock activity?	GSENM NOI Response.docx
Anderson-Schwartz	Pat	N/A	Riparian areas	Protect riparian areas from erosion and disturbance to encourage the most optimal support of all life in the monument.	BLM Comments.docx
Chalfant	Brad	N/A	Riparian areas	We would argue that given the growing management challenges, as well as the unpredictability of climate impacts, that finite management resources focus first on maintaining and where possible enhancing ecological function within the monument. Specifically, we would argue for restoring and enhancing natural ecological function of riparian areas, springs and seeps. This can and must include, but should not be limited to the removal of hyper competitive non-native species, such as tamarisk and Russian olive; restoration of native beaver populations; removal of feral livestock and close management of recreational impacts to water quality and riparian zones.	N/A
Barnes	Matt	Shining Horizons Land Management	Riparian areas	The importance of the Hole in the Rock trail as an exemplar of Western pioneer history cannot be overstated. Yet, other than the roads, the area retains most of its wild character. I urge you to mitigate the impacts of those roads; and beyond them, to manage for wilderness-like conditions. More specifically, I recommend prioritizing the health and proper functioning condition of the riparian areas including the Escalante and its tributaries, with an emphasis on raptor and fish habitat.	N/A
McCoy	Melissa	U.S. EPA Region 8	Riparian areas	Impacts to Wetlands and Riparian Areas. EPA recommends the Draft EIS include a description of current site-specific range conditions and the types of grazing impacts that may affect wetlands and associated springs. Such impacts may include functional conversion of wetlands (e.g., forested to shrub-scrub); changes to supporting wetland hydrology (e.g., snow melt patterns, sheet flow, and groundwater hydrology); and wetland disturbance. With respect to grazing, we also recommend that the Draft EIS describe how BLM intends "to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands" as described in Executive Order (EO) 11990, Protection of Wetlands.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Campbell	Todd	University of Tampa	Riparian areas	In the riparian zones of the Escalante River, there are many problems with invasive species overtaking the riverbanks. One major invasive plant is called Russian Olive. Russian olive is a medium size woody tree which is native to Europe and Asia and came to America in the twentieth century. Some Russian Olive trees can grow up to 25 ft tall. The reason Russian Olive is so deadly to the riparian zones of the Escalante River is because it outcompetes the rest of the native plants and trees. Because of poor water quality, floods, erosion, grazing, and many other factors, many of the native plants are killed off. Russian Olive has a large canopy cover and blocks out most of the light that the small native plants and grasses need to grow. However, Russian Olive does not only block out other native plants, it also affects the water itself. The trees grow and make the channel of the waterways much narrower, making water traffic difficult to get through as well as altering the flow of water. Russian Olive will also erode the landscape around it, creating new channels or even a type of dam which can restrict water flow. This restriction causes sedimentary backup and doesn't allow any type of aquatic life to swim up and down the river. Russian Olive can also change the water temperature due to the amount of shade it provides to the aquatic system. Lastly, Russian Olive is not a good habitat for birds which have a hard time creating nests or resting in the trees. As previously stated, Russian Olive destroys other local native plants which contribute to the habitat for local species like Flannel mouth sucker, Bluehead sucker, round tail chub, speckled dace, Bell's vireo, Lucy's warbler, Virginia's warbler, and northern leopard frog. The Escalante River Watershed Partnership summarizes the main effects of Russian Olive by saying, "These non-native trees constrain the river channel, change flooding dynamics, and alter water temperature and chemistry while also restricting access for visitors."	N/A
Campbell	Todd	University of Tampa	Riparian areas	With the many issues we investigated surrounding problems with the watershed, we found that many of the problems are interconnected and are causing problems to the watershed area throughout the GSENM. Many of these invasive plants on the riparian zones are dominating because of human interaction, grazing, and wildfire (GSENM 2022). Development throughout the national monument cause more tourists to visit each year, causing more development and destruction to the land throughout the park.	N/A



Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Campbell	Todd	University of Tampa	Riparian areas	Like human interaction, grazing is a big problem through the national park. Grazing's need to be linked to water supply, and many of the grazing that still happens occurs along the Escalante River. Brian Maffley wrote an article examining both sides of grazing and its proposed increase within GSENM, as well as explaining policy that BLM is thinking of implementing. In it, he says, "The BLM is also looking to designate "river gaps" along the Escalante, where cattle may access the river to take pressure off other water sources." As a result of these river gaps, surface disturbances would be isolated but in accordance with the 2020 Approved RMP, this would disturb the 330-foot buffer and the effects of these gaps would have to be fully mitigated if no other alternatives are present. In times of precipitation, much of the waste from livestock is washed into the riparian zone areas which kills most of the vegetation. This also effects the other animals and aquatic life the use the plants for food or habitats. With the decrease in native plants, invasive species, most notably Russian Olive, take over these areas and outcompete the native plants. Russian olive is very difficult to get rid of, with multiple different methods tried to get rid of it and none are successful besides complete removal of the plant and root system. As a result, this is a very costly process to remove these plants from the area. Also, Russian olive has lots of canopy cover which does not let many native plants grow underneath it or around it. As Russian Olive grows along the riparian zone, it can change the landscape of the watershed, causing more erosion and moving water into different areas then before, sometimes causing backups (NSENМ). Looking at the big picture with the Escalante River, the water will make its way down stream to Lake Powell at some point in time. With the water problems effecting the area currently, bad water quality and possible limited after flowing down stream will affect other cities and communities down the river.	N/A
King	Catherine	Utah Native Plant Society	Riparian areas	Disturbance needs to be minimized, particularly disturbance caused by human activities, so that hydrologic processes can be maintained and sites can recover. Livestock grazing is one of the most significant impacts to riparian areas. Reducing or eliminating livestock grazing in riparian areas is one of the most straightforward ways to improve riparian areas	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Riparian areas	Recreation also impacts riparian areas and needs to be managed to minimize impacts to hydrologic functions.	UNPS on GSENM 2022 (1).docx
Popejoy	Mike	Grand Canyon Trust	Water quality	The AMS indicates that "For the 2022 reporting year, forty-one percent of assessment units within the decision area were classified as impaired and failing to meet water quality standards" which is very concerning. That has negative implications for fish and other aquatic organisms as well as for recreationists who come in contact with contaminated water. Efforts need to be made to identify the causes of water quality impairment and resolve them where possible.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Water quality	The causes of water quality impairment need to be identified and then plans can be made to reduce or eliminate those causes of impairment. This will require cooperation and coordination between state water authorities as well as communities, government and special interest groups.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Water quality	The AMS states that a "specific threat to water quality throughout GSENM is invasive woody plants" and specifically Russian olive. The AMS incorrectly states that "The major threat to water quality (TDS) by these invasive species is through change in channel geometry and resulting channel erosion." Whereas it is true that Russian olive can invade riparian areas and negatively alter stream channel geomorphic processes, we are skeptical that Russian olive has any meaningful negative effect on water quality (if such data or studies exist, we would like to see them). The more important influences on water quality are likely livestock (defecating in or near streams as well as reducing vegetation that traps sediment and filters out nutrients), recreationists, vehicles, and upstream agricultural practices.	Appendix B - RNA Proposals.pdf
Sjogren	Morgan	N/A	Water quality	Water quality assessments need to be made to ensure waterways provide healthy and safe drinking water to wildlife and the public. I am always concerned about water sources near grazing allotments. Humans are not allowed to camp near water sources, so cows should not be allowed to poop in them. Cows should not be allowed in spring-fed areas, riparian areas, or significant waterways.	40 Mile Gulch _ 2 May 2020.pdf
McCoy	Melissa	U.S. EPA Region 8	Water quality	Public Drinking Water Sources Source water protection is a key issue to consider in Monument planning. In order to ensure that public drinking water supply sources (including surface water sources, groundwater sources and groundwater under the direct influence of surface water [GWUDISW] sources) are protected from potential impacts associated with BLM-authorized activities in GSENM, it is important to identify where these sources are located. Therefore, EPA recommends the Draft EIS include a map depicting municipal supply watersheds and source water protection areas for public water supply wells and surface water intakes in accordance with state data security requirements. Once these resources are identified, we recommend the Draft EIS include an analysis of the potential impacts to drinking water sources from Monument activities such as recreation and grazing and identify measures available to protect such resources.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Snyder	Shannon	U.S. EPA Region 8	Water quality	<p>Road networks through areas with highly erodible soils often contribute to water quality impairments and alter stream flow. More specifically, disturbance in erosive soils can alter watershed drainage patterns, and increase surface runoff, erosion and delivery of surface sediment and other pollutants to streams. It can also cause mass wasting on slopes and delivery of debris to streams, as well as stream temperature changes. Depending on variables including soil characteristics, management actions, and topography, runoff from future surface disturbances could introduce sediments as well as salts, heavy metals, nutrients and other pollutants into surface waters. We recommend the Draft EIS evaluate the baseline condition of soils, erosion, and sedimentation of water resources in the planning area, as those conditions relate to existing roads. Travel management planning areas, including off-highway vehicle (OHV) use areas, may be designated and/or revised as part of the analyses included in the Draft EIS. Such changes could include construction, reconstruction, and improvement of roads and trails for multiple activities, or closure of roads and trails to protect Monument objects, values, and resources. We recommend the Draft EIS include detailed maps showing planning area resources juxtaposed with the existing road and trail network, for example, maps illustrating the soil erosion potential and aquatic resources such as surface water, wetlands, springs, riparian areas, and shallow aquifer recharge areas layered with the existing road and trail network. and the proposed travel management designations for each alternative. A discussion of foreseeable construction, reconstruction, and improvement activities by alternative will be informative. In addition, we recommend the Draft EIS include a discussion of the following potential impacts and considerations associated with the roads and trails and associated management planned under each alternative: road drainage and surface erosion; sediment delivery to streams; culvert sizing, design, and placement; effects on stream structure and seasonal spawning habitats; road density; number of road/stream crossings; and road/trail encroachment on stream, riparian, and wetland habitats. If OHV area designations will be relaxed inside the Monument boundaries, it will be important for the Draft EIS to explain BLM's rationale for allowing a potential relaxation of Monument resource protections. We recommend the Draft EIS include a list and discussion of avoidance measures and BMPs for addressing the potential water and soil impacts associated with travel and transportation management decisions. The EPA recommends the BLM reduce impacts through the use of such measures to protect sensitive soils, wetlands, riparian areas, meadows, stream crossings, and critical habitat. The inspection, maintenance, and adjustment of BMPs will help protect surface water resources. Mitigation measures to consider include the following:</p> <ul style="list-style-type: none"><li>- Minimize motorized route construction and reduce density to minimize potential adverse effects to watersheds.</li><li>- Locate routes away from streams and riparian areas, steep slopes, landslide prone areas, and erosive soils.</li><li>- Minimize the number of road stream crossings.</li><li>- Construct unavoidable road stream crossings during periods of low flow to avoid fish spawning and incubation periods or dewater relevant stream segments prior to construction.</li><li>- Provide adequate road drainage and erosion control to avoid routing sediment to streams.</li><li>- Use bottomless or textured bottom culverts if possible.</li><li>- Design routes to allow for natural drainage patterns.</li><li>- Consider road decommissioning or rehabilitation at an equal or greater rate than new road construction to prevent increases in overall watershed impacts.</li><li>- Monitor revegetation efforts on closed routes for five years to ensure success.</li><li>- Require special protections, such as buffer zones or exclusion of motorized use, for areas with high quality riparian and wetland resources such as springs and wet meadows and other sensitive water resources including impaired waterbodies or high resource value waterbodies.</li></ul> <p>Establishing and maintaining protective road design features is critical to minimizing harm to streams and aquatic life. Maintenance backlogs can result in progressive degradation of road drainage structures, significant road-drainage problems, and increased erosion and stream sedimentation with accompanying adverse impacts on aquatic habitat and ecosystem health. Given the environmental importance of road maintenance, the substantial associated costs, and the potential for a maintenance backlog, we recommend designing all alternatives in the Draft EIS so that they can reliably be kept to BLM maintenance standards under current funding. It would also be helpful to understand current trends in the availability of road maintenance funding to estimate what funding may be available in the future. It would be appropriate for the Draft EIS to identify and consider the past and current trends in OHV use in the planning areas. We also recommend the Draft EIS evaluate the road network's environmental resource impacts associated with trends toward more frequent intense precipitation events and larger, more intense fires. Should future funding levels prove insufficient to maintain the system, we recommend specifying in the Draft EIS the actions that will be taken to modify or reduce the road system to meet water quality standards and land health standards.</p>	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Snyder	Shannon	U.S. EPA Region 8	Water quality	<p>Water Quality Impacts of Soil Disturbance and Vegetation Changes. The potential environmental impacts of grazing may stem from vegetation loss, accelerated soil loss, bank erosion, soil compaction, increased surface storm flow, reduced stream base flows from decreased infiltration to groundwater, and changes in water temperature associated with shade loss or channel widening. We recommend the Draft EIS include an assessment of each alternative's potential impacts and benefits to aquatic resources, including impacts to water quality, stream and wetland processes, and fish populations/habitat.</p>	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
McCoy	Melissa	U.S. EPA Region 8	Water quality	<p>Water quality data for the streams, lakes and wetlands in the analysis area provide important information for evaluation of the potential influence of management activities on instream and downstream water quality. Such an evaluation can then guide Monument planning, with the existing data providing a baseline for future monitoring of impacts. We recommend the Draft EIS provide a summary of available information and monitoring data on water quality for the analysis area, including parameters such as total suspended solids, total dissolved solids (TDS), dissolved oxygen, total nitrogen, total phosphorus, conductivity, temperature and those of interest for impaired waterbodies within or downstream of the project area. Physical aquatic habitat parameters may also be important indicators for determining a waterbody's current impairment or stress as well as its sensitivity to further impacts. Identification of any significant gaps in data may be helpful in developing the project monitoring plan. Water quality monitoring data should be collected at a high enough frequency and duration, and at both reference locations and locations subject to BLM-authorized activities, to capture what changes are a result of 1) natural fluctuations due to seasonal changes in hydrology and erosion vs. 2) BLM-authorized activities.</p>	FINAL EPA GSENM Scoping Letter 9-27-22.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Campbell	Todd	University of Tampa	Water quality	Throughout the Grand Staircase National Monument (GSENM), water quality and vegetation management issues are present throughout the riparian zone, mostly along the Escalante River. Riparian area only covers 0.18% of the Grand Staircase Escalante National Monument, thus the protection and restoration of it is vital to the health of the area and downstream areas. Water quality is a substantial issue, with poor water quality present throughout the rivers due to a large percentage of dissolved oxygen and dissolved solids in the water (Dyer). About 41% of the watershed areas throughout GSENM had water quality issues (GSENM 2022). Water is an important part of all ecosystems and is vital to the national monument, as it supports the lush aquatic life, terrestrial life, and human recreation throughout the national park. Dyer, Melissa, et al. "Water Quality Monitoring for the Escalante River and Coyote Gulch in Glen Canyon National Recreation Area." National Parks Service, U.S. Department of the Interior, Dec. 2017	N/A
Walker	Joro	Western Resource Advocates (WRA)	Water quality	BLM's management actions must also ensure compliance with Utah Water Quality Standards. E.g. see 43 U.S.C. 1701(a)(8) & 1712(c)(8). Utah Water Quality Standards specify that several waters in the Monument - including Calf Creek, Sand Creek, Mamie Creek, Sand Creek and Kanab Creek - are designated as a "Category I" water and therefore entitled to the utmost protection. In Utah, Category I waters are given the same protections granted to Outstanding National Resources Waters under the federal antidegradation policy. Category I waters are of exceptional recreational or ecological significance and shall be maintained at existing high quality. To achieve this end, no "new" point source discharges shall be allowed into Category I waters and nonpoint sources shall be controlled to the extent feasible through implementation of best management practices or and regulatory programs. Ultimately, however, water quality in these prized streams must be maintained at existing levels and may not be degraded. As evidenced above, the Proclamations identify water resources as Monument Objects that must be protected not only for their intrinsic value, but also because they provide habitat and ecosystem services for the wildlife species enumerated in the proclamation, promote and maintain water quality and water quality, and provide high quality water to local communities. Key to safeguarding water quality and quantity and plant and animal species, as well as other watershed and wetland values, is managing activities upstream and elsewhere in the relevant watersheds.	wra gsenm rmp scoping 9 18 2022.pdf
Walker	Joro	Western Resource Advocates (WRA)	Water quality	water resource values thought out the Monument must be protected from harm and water quality within the boundaries of Grand Staircase-Escalante and the headwaters feeding its waters may not be degraded. Moreover, activities on the Monument must preserve and restore watershed and ecosystem values in downstream Glen Canyon.	wra gsenm rmp scoping 9 18 2022.pdf
Popejoy	Mike	Grand Canyon Trust	Water rights	The BLM could seek to acquire water rights at streams, springs, and wetlands where there has been significant dewatering or damage to wetland ecosystems from a variety of sources. If more instream flow can be provided for these systems, then they can begin to recover and better support riparian vegetation, aquatic organisms and other wildlife.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Lands and realty	Regarding the potential disposal of public lands contained within the Monument, public and private access, and rights-of-way, BLM must craft management of the Monument as directed by Proclamation 10286. Unlike other BLM-managed public lands, management of the Monument is specifically directed by what is necessary to conserve and protect Monument objects and values. This means that all Monument lands shall be retained in public ownership.	Appendix A - Figures & Tables.pdf
Cutler	Clayton	Kane County Utah	Lands and realty	One of the common themes that cross all economic and cultural foundations in Kane County is access to public lands. Access rights-of-way and water rights were critical to the early pioneers in Kane County and remain critical today. To manage land within the Grand Staircase- Escalante National Monument, Kane County promotes responsible management, enhancement, and development of existing and future livestock grazing resources. Accountable planning, which includes rangeland treatments, would provide protection for the resources that established the customs, culture, and values of Kane County. This encompasses the responsible development of the abundant deposits of energy and mineral resources, such as oil, natural gas, oil shale, oil sands, coal, gold, uranium, and copper, which are compatible with grazing activities in the region.4 4 Kane County Resource Management Plan p. 81.	Scoping Letter GSENM -signed.pdf
Murray	Danielle	N/A	Lands and realty	c) Rights of Ways- In 2012, the BLM released Policy Manual 6220, which set specific guidance for BLM employees concerning the granting of new rights-of-way (ROW) through units of the National Conservation Lands system. Policy Manual 6220 creates a presumption the BLM will not approve new rights-of-ways in National Monuments and National Conservation Areas. The manual states: "To the greatest extent possible, subject to applicable law, the BLM should through land use planning and project-level processes and decisions, avoid designation or authorizing use of transportation or utility corridors within Monuments and NCAs.18 18 BLM Manual 6220- National Monuments, National Conservation Areas, and Similar Designations, 1/25/2017 https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter_blmmanual6220.pdf In fact, BLM has clearly stated that this policy does NOT allow the agency to grant new rights-of ways in National Monuments and National Conservation Lands. In the 2018 Draft EIS for the San Pedro NCA, BLM stated, "The BLM considered designating ROW corridors along Highways 82, 90, and 92. The BLM's National Landscape Conservation System policy prevents the BLM from designating new corridors in NCAs and national monuments."19 19 San Pedro Riparian National Conservation Area 2-5 Draft RMP/EIS, June 2018. https://eplanning.blm.gov/epl-frontoffice/projects/lup/36503/149559/183610/SPRNCA_DRMP_VolI_508.pdf	Scoping Comments GSENM- Conservation Lands Foundation.pdf
Drake	Morgan	N/A	Lands and realty	All designated utility corridors should be managed as ROW open areas. Placing any ROW avoidance, seasonal restriction, or other resource protection measure over a congressionally designated utility corridor conflicts with the intent of Congress in designating a utility corridor.	2022.0927 WCWCD GSENM RMP and EIS Scoping Comment.pdf
Murray	Danielle	N/A	Lands and realty	As such, we recommend the following management actions: - Designating the Monument or NCA as an exclusion or avoidance area; and - Work with existing ROW holders to relocate outside the unit if possible, rather than permitting renewal or expansion of ROWs in existence at the time the unit was created.20 20 BLM Manual 6220- National Monuments, Conservation Areas, and Similar Designations.	Scoping Comments GSENM- Conservation Lands Foundation.pdf
Drake	Morgan	N/A	Lands and realty	Furthermore, the congressionally designated utility corridor should not be included in the National Trail Management Corridor viewshed of the Old Spanish National Historic Trail. It is inappropriate to allow restrictions created by a historic trail to limit use of a congressionally designated utility corridor.	2022.0927 WCWCD GSENM RMP and EIS Scoping Comment.pdf
Berry	Scott	N/A	Lands and realty	i.Retain all lands in public ownership, with the potential exception of lands immediately adjacent to gateway communities required for the provision or extension of public services. ii.Seek out opportunities for the purchase of private in-holdings on a willing seller / willing buyer basis.	Berry GSENM RMP Scoping Comments 26 September 22.pdf

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Brock	Kathrin	N/A	Lands and realty	Kane County residents rely heavily on the proper management of the lands contained in the GSENM as 87% of the lands in the county are federally controlled with the GSENM taking up 49% of the county's total acreage. There has been on-going litigation on the RS-2477 rights-of-ways in the GSENM. As in-holders it is our hope that the BLM will help determine the validity of a road as an R.S. 2477 right-of-way in the planning process. It is very important to us that access remains open for all in-holders on the historic routes that have been used for years.	Brock - BLM Comments - September 2022.docx
Orr	Nancy	N/A	Lands and realty	No energy development within Monument boundaries - not fossil fuels, nor solar or wind development. GSENM needs to remain unspoiled. <u>Language specifically disallowing any sort of energy development (including future sources yet unknown) should be included in the new plan.</u>	N/A
Drake	Morgan	N/A	Lands and realty	Public Law 105-355, signed by President William J. Clinton on October 31, 1998, established a utility corridor along U.S. Route 89 in Kane County Utah, between Glen Canyon National Recreation Area and Mount Carmel Junction. The utility corridor includes BLM land within 240 feet of the center line of U.S. Route 89 on the north side of the highway, and BLM land within 500 feet of the center line of U.S. Route 89 on the south side of the highway. As federal law, this utility corridor has supremacy over federal land use planning. A congressionally designated utility corridor does not merely authorize use of federal land for utility development (which could occur on most federal multiple-use land) but prioritizes use of that federal land for utility development. Thus, restrictions in the RMP that would hinder utility development within the corridor are inconsistent with Public Law 105-355. The district urges the BLM to adopt the following standards in its planning process to preserve the congressionally designated utility corridor. First, resource restrictions should clearly apply to areas outside the congressionally and other designated utility corridors through zoomed in maps and clear language in the RMP. Second, the congressionally and other designated utility corridors should be classified as Visual Resource Management (VRM) Class IV. Third, the congressionally and other designated utility corridors should be managed as ROW open areas.	2022.0927 WCWCD GSENM RMP and EIS Scoping Comment.pdf
Drake	Morgan	N/A	Lands and realty	The district has an interest in ensuring the future use of appropriate lands within the planning area for utility development, both pursuant to BLM planning decisions and within corridors previously established by congressional action. The Lake Powell Pipeline (LPP) is one example of a buried utility that should be carefully considered. The LPP is a water supply project critical to the needs of Washington County. The alignment for the LPP travels along U.S. Highway 89, which long pre-dates the GSENM, generally within the highway right-of-way (ROW) and a congressionally designated utility corridor.	2022.0927 WCWCD GSENM RMP and EIS Scoping Comment.pdf
Orr	Nancy	N/A	Lands and realty	Viewsheds should be preserved, meaning no structures such as communication towers or utility infrastructure allowed within the Monument.	N/A
Drake	Morgan	N/A	Lands and realty	BLM should classify the congressionally designated utility corridor as VRM Class IV in conformance with the intent of Congress. VRM class designations should be based on management considerations and priorities for land uses. Congress has expressly told the BLM on what management considerations and priorities to base this designation by passing Public Law 105-355. Under VRM Class IV, BLM still has authority to minimize visual impacts, but the level of mitigation would be tempered by the objective which allows for high levels of change to the landscape. Overlaying any restriction below VRM Class IV on a congressionally designated utility corridor creates a significant bias for visual resources over needed infrastructure utility projects and, in effect, washes out the intent of the congressionally designated utility corridor. The corridor should be managed in a way that directs utility development through the utility corridor, where visual resources are already impacted by the presence of the highway and existing utilities, rather than through remote, undeveloped lands. The same utility corridor on the Arizona side of the state line is managed as VRM Class IV in the Arizona Strip Field Office RMP. The VRM designation in Utah should follow suit.	2022.0927 WCWCD GSENM RMP and EIS Scoping Comment.pdf
Drake	Morgan	N/A	Lands and realty	Restrictions should clearly apply only to areas outside congressionally and other designated utility corridors. The congressionally designated utility corridor should be clearly depicted in maps to show that it is excluded from various resource restrictions. Otherwise, it is hard to evaluate the impact of restrictions on the corridor and ensure the primacy of the corridor. All management actions affecting ROWs should include explicit language excluding designated utility corridors.	2022.0927 WCWCD GSENM RMP and EIS Scoping Comment.pdf
Drake	Morgan	N/A	Lands and realty	The district has provided BLM with specific project level detail for the LPP in the planning area within and outside the congressionally designated utility corridor. For example, HS-1 was modified and moved to its current location partially outside the corridor to address visual resource concerns raised by BLM and allow for a natural knoll to screen the facility from Highway 89. Similarly, the Southern Alternative alignment at the west end of the planning area was specifically designed outside the corridor to avoid cultural resource impacts. (See attachments.) Because HS-1 and the Southern Alternative alignment were moved outside the congressionally designated utility corridor to address agency concerns, they should be excluded from resource restrictions and treated as if located within the congressionally designated utility corridor.	2022.0927 WCWCD GSENM RMP and EIS Scoping Comment.pdf
J	A	N/A	Lands and realty	DEVELOPMENT: No new comm sites, utility ROWs, or mineral disposal in areas with special status species. We don't need any more cell service on the monument. People can buy PLBs or sat phones or whatever, same as they have to do on a river trip or mountain expedition. The existing ROWs for utilities are plenty and GSENM should not be a dumping ground for anything, let alone minerals extracted from the earth. Solar and wind development can happen in UT can happen on other BLM and SITLA lands. There is no reason these uses need be allowed within GSENM. Same goes for other energy alternatives. Include language explicitly disallowing such things.	GSENM_20220923.docx
Orr	Nancy	N/A	Lands and realty	No oil, gas or water transportation infrastructure should intrude into or cross the Monument.	N/A
Weaver	Brad	N/A	Lands and realty	Rights of way granted by the court to state, county, municipal and private entities should also be identified. GSENM planners should honor established rights of way, but costs of maintenance for such rights of way should be born by the grantee unless and until such rights of way are transferred to the GSENM. Proposed expansion or upgrade by grantees of their rights of way inside the GSENM that would jeopardize GSENM resources should be contested based on the GSENM Management Plan. Claimed rights of way that have not been granted by the court should not be recognized by GSENM planners.	GSENM Scoping Comments.pdf
Weaver	Brad	N/A	Lands and realty	State, county, municipal and private rights of way and inholdings in the GSENM should be transferred to the GSENM to the greatest extent possible in order to facilitate implementation of this management plan. Time-limited leases and rights of use should not be renewed upon their expiration unless they conform completely and in perpetuity with the ongoing GSENM Management Plan.	GSENM Scoping Comments.pdf

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Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Lands and realty	Lands and Realty: Through co-stewardship and regular consultation the tribe should be involved in decision-making related to the retention, disposal, or acquisition of lands as these activities have implications for traditional use or impacts to cultural resources.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Lands and realty	We note with dismay that 3.3.I under State Plans language is "may be germane"... Nothing in this plan mentions the terms Grandfathered in or increasing public access. We recommend additional language to explain "how" this State Plan will be supported and implemented to keep Historic, Cultural or Traditional uses, and we highly recommend supporting family gatherings and documenting family histories to protect the methods and procedures learned from living with these lands. There are a few additional uses that should be given perpetual inclusion: The Outlaw Trail Rides started by Crockett Dumas, the Lighting of The "E" by Escalante High School, Family pinenut picking, Maintaining all-weather through roads from Escalante through the Kelly Grade to Big Water; from Cannonville through Kodachrome to Big Water; from Escalante to Hole-in-the-Rock with a marina at Llewellyn Gulch; paving the small section of Burr Trail through Capitol Reef National Monument to Ticaboo to make it an all-weather road, not only for law enforcement but for the general boating public. We recommend regular maintenance of the Hole-in-the-Rock Road and the development of a state-of-the-art, full-service marina at Llewellyn Gulch to accommodate the many visitors who travel to see Rainbow Bridge by water. Bullfrog and Hite marinas are proof of successful ventures. We recommend working with Utah and Capitol Reef National Park to upgrade the 14 miles of Burr Trail which would make it an all-weather road to accommodate east-west safety travel through Garfield County. If this is not implemented, we recommend Garfield County impose a toll road for BLM/GSENM vehicles at Boulder and Ticaboo to aid in emergency management. This could be done with automatic camera surveillance scanning license plates!	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Lands and realty	A couple pivotal points included Lincoln Lyman's affidavit (which is filed at the Garfield County courthouse) naming who paid him to make the roads on the mountains. He alleged that BLM did not have exclusive authority to lock or bar ditch 'privately' paid for RS2477 rights-of-ways. Some roads were contracted by GSENM themselves, which they initially called 'roads.'	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Lands and realty	That current and future Range Management Plans, protect grazing, mining and timber harvest at no lower than 1996 levels when GSENM was proclaimed, and that no use under the Multiple Use Guidelines be eliminated.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Lands and realty	We recommend that all trails, byways, roads, corridors or RS2477s be grandfathered in at Proclamation inception levels and scheduled for routine upgrades and maintenance to provide access for sightseeing, family gatherings, timber harvest, big game hunting, fishing and aid in cattle grazing and scientific discovery.	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Lands and realty	18.2. Hole in the Rock Road The State of Utah and Garfield and Kane Counties clearly have an R.S 2477 Right-of-Way on the Hole-in-the-Rock (HITR) Road. The BLM has acknowledged this twice in the past. While it is true that BLM lacks authority to make binding determinations on the validity of rights-of-way granted under R.S. 2477, this does not mean that BLM is forbidden from determining the validity of the HITR Road as an R.S. 2477 right-of-way for its own purposes.(105) In fact, the BLM on two separate occasions has made this determination for its own purposes.(106) The BLM first determined HITR Road as an R.S. 2477 right-of-way in 1970, in a Memorandum of Understanding between Garfield County and the BLM, The BLM admitted this much to the Interior Board of Land Appeals (IBLA) court.(107) The BLM later reaffirmed that determination in a March 8, 1988, Environmental Assessment and in a January 20, 1988 letter to the Sierra Club.(108) The authority of the BLM to make administrative determinations on R.S. 2477 rights-of-way was recently affirmed by the United States Court of Appeals for the Tenth Circuit.(109) The BLM should, for its own purposes, determine the validity of the HITR road as an R.S. 2477 right-of-way in this EIS process. (105) S. Utah Wilderness All v. Bureau of land Mgmt., 425 F.3d 735, at 757 (106) The Sierra Club Et Al. IBLA 88-364 August 17, 1988, p.2 (107) Id. (108) Id. (109) Opinion attached	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Lands and realty	Lands and Realty As discussed hereunder in the section regarding Travel and Access, it is true that BLM lacks authority to make binding determinations on the validity of rights-of-way granted under R.S. 2477. However, this does not mean that BLM is forbidden from determining the validity of a road as an R.S. 2477 right-of-way (ROW) for its own purposes.26 There are a multitude of R.S. 2477 roads crisscrossing the GSENM, the ROW of which is claimed by the State, and/or Kane and Garfield Counties. These R.S. 2477 roads are easily identifiable through the use of PLPCOs interactive Access Map 360.27 The State would encourage the BLM to use this tool to identify and avoid impeding R.S. 2477 roads throughout the GSENM as part of this RMP planning process.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Pollock	Leland	Garfield County Commission	Lands and realty	According to the AMS, there are 137 active rights of way (ROWs) and other land use authorizations (LUAs) encumbering BLM managed land throughout the decision area. Garfield County recognizes the need for ROWs across federal land to meet the needs of our communities. We also see the need to continue to use the ROWs for future development to meet the needs community growth. Where practical, we support using utility corridors for multiple utilities to reduce impacts. We also recognize that this is not always practical and we support the development of new ROWs where their impacts will be minimal to the environment.	Garfield County Commission.pdf
Pollock	Leland	Garfield County Commission	Lands and realty	The AMS also identifies 14,800 acres of private lands not managed by the BLM in the planning area. These private lands preexisted the GSENM and should not be further impacted by any planning efforts. Garfield County supports the development of any needed ROWs to access the lands. The AMS also spoke of the desire of the GSENM to identify willing sellers of GSENM inholdings. Garfield County is comprised of approximately 95% public land (Federal & State) with only 5% private. This makes it extremely difficult for the County to collect revenue. Because of this, Garfield County has a "no net loss of private land" policy. We are not in support of any purchase of private lands by the federal government. However, we may support land exchanges where the net benefit is in favor of the County and where access to public lands is not limited by the implementation of the trade.	Garfield County Commission.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Lands with wilderness characteristics	Because of these and other incorrect applications of Manual 6310, BLM's 2018/ 2019 wilderness character inventories routinely fail to correctly identify wilderness character in a significant percentage of inventory units. These specific unit errors include: 1- Stand-alone units and/ or areas possessing unidentified wilderness characteristics that require an updated LWC inventory due to substantial errors and misapplications of Manual 6310 during inventories in 2018/ 2019: - Muley Twist Flank - Canaan Peak Slopes - Kodachrome Headlands - Willis Creek (Horse Mountain) - Rock Cove - Pine Hollow - Timber Mountain - Glass Eye Canyon - Ladder Canyon - Nephi Point - Slopes of Bryce - Bryce View - Bryce Boot 1- Stand-alone unit possessing unidentified wilderness characteristics warranting an updated LWC inventory not part of the 2018/ 2019 LWC inventory: -Coyote Creek 2- Units and/ or areas currently adjoining designated WSAs or identified LWC units with arbitrary boundaries (i.e., section lines, mapped lines bisecting the natural landscape) which are not actually physically separated from contiguous designated WSAs or LWC and were part of the 2018/ 2019 inventory: - Andalex Not (A few small areas along Smokey Mountain Road and Smokey Hollow) - Lampstand (Near point 7323 in the Circle Cliffs and Capitol Reef National Park) - Upper Kanab Creek (Several small areas on Skutumpah Terrace) 3- Units and/ or areas currently adjoining designated WSAs or identified LWC units with arbitrary boundaries (i.e., section lines, mapped lines bisecting the natural landscape) which are not actually physically separated from contiguous designated WSAs or LWC and were not part of the 2018/ 2019 inventory, including former-SITLA parcels: - Box Canyon (Small area contiguous to Bryce Canyon National Park) - Burning Hills (Small areas around old vegetation manipulation projects, but not impacted south of Collet Top) - Carcass Canyon (Twentymile Wash near junction of Hole-in-the-Rock and Left Hand Collet Canyon roads) - Death Hollow (Small area along Highway 12) - Fiftymile Mountain (lands below Straight Cliffs near Batty Caves, bench area by Twentymile Wash near junction of Hole-in-the-Rock and Left Hand Collet Canyon Roads and one former SITLA section in Left Hand Collet Canyon) - Horse Spring Canyon (Former SITLA section in Little Valley) - Mud Spring Canyon (Area north of Grosvenor Arch and in Butler Valley Neck) - North Escalante Canyons (Small areas around Wolverine Creek, mesa area by Burr Trail and under Circle Cliffs area, sandstone butte near the community of Boulder, a small area along Highway 12, an area near junction of Hole-in-the-Rock and Highway 12, a small area along the Spencer Flat Road, and a few former SITLA sections including in Long Canyon and 3 along the boundary of GCNRA) - Paradise-Wahweap (An area in Fourmile Canyon, and 3 former SITLA sections including on Horse Flat) - Paria-Hackberry (Many areas along the northern boundaries all south and southeast of Kodachrome Basin State Park - Little Dry Valley, Rock Springs Bench, Jodey Point, Lower Slickrock, Round Valley Draw and Butler Valley, areas on Deer Range, small area northwest of Bullrush Gorge, small area on Calf Pasture Point, small areas by Skutumpah Road and Lick Wash and a few former SITLA sections) - Steep Creek (Circle Cliffs region and around The Flats, two small areas along the Burr Trail and one former SITLA section in Long Canyon) - Studhorse Peaks (A few locations in the Canyon Flats area, and the southern tip by Wolverine Loop Road) - The Blues (Small area near Highway 12) - The Cockscomb (Northern tip near Paria River) - Willis Creek (Small area northeast of Bull Valley, a small area near Indian Hollow, and one additional small area near Bullrush Hollow) 4. Units and/ or areas possessing unidentified wilderness characteristics that require updated LWC inventory because they are contiguous with federally-managed lands within National Park Service units of Capitol Reef National Park, Glen Canyon National Recreation Area, and Bryce Canyon National Park-specifically within contiguous NPS units managed as recommended wilderness: - Capitol Reef National Park 1.Lampstand 2. Muley Twist Flank - Glen Canyon National Recreation Area 1. Sooner Bench (1, 2, and 3) - Bryce Canyon National Park 1. Bryce View 2. Slopes of Bryce Each of these stand-alone and contiguous units must be re-inventoried as part of the current Monument plan revision process, to conform to current inventory requirements under Manual 6310.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Lands with wilderness characteristics	Finally, unfortunately in 2018/2019, the vast majority of inventory teams were made up of resource specialists who do not have a background in wilderness and/or wilderness management. This appears to have been a contributing factor to several of the errors in the 2018/2019 LWC inventories conducted as discussed above. As part of updating its inventories for these areas, BLM should assemble a team more specialized in wilderness management to conduct and review on-the-ground inventories. The Utah BLM State Director should seek a team leader for this effort with the relevant expertise, with roughly half the team of Utah BLM staff and the other half from other state BLM offices. All wilderness inventory teams should have expertise in conducting BLM wilderness inventories outside their own field offices or management units.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Lands with wilderness characteristics	In order to possess wilderness characteristics, an area must "possess sufficient size, naturalness, and outstanding opportunities for either solitude or primitive and unconfined recreation" and can also contain supplemental values. BLM Manual 6310.06(C)(2). Through this planning process, BLM should recognize the wide range of values associated with lands with wilderness characteristics that supplement and benefit other resources that the Agency manages for, including Monument objects and values. These benefits of LWC include scenic values, recreation, wildlife habitat and connectivity, cultural and historic resources, and economic benefits. Additionally, inventorying and managing lands with wilderness characteristics for protection of these values provides for balanced use. The vast majority of BLM-managed lands are open to motorized use and development. FLPMA recognizes that "multiple use" of the public lands requires "a combination of balanced and diverse resource uses" that includes recreation, watershed, wildlife, fish, and natural scenic and historical values. 43 U.S.C. § 1702(c). The National Conservation Lands, including Monuments and LWC, provide critical balance to public lands management by directing the Agency to adopt conservation-focused management of our most spectacular western landscapes. Protection of wilderness characteristics will benefit many of the other multiple uses and values of BLM-managed lands such as air and water quality, night skies, soundscapes, and viewsheds, while other more exclusionary uses (such as off-road vehicle use and timber harvesting) will still have adequate opportunities on other BLM lands.	Appendix B - RNA Proposals.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Lands with wilderness characteristics	We recognize that BLM conducted wilderness character inventories for some, not all, warranted lands within the planning area during the plan revision process that began in 2018, following Proclamation 9682 and the shrinking of Grand Staircase-Escalante National Monument. However, much of that updated inventory process was flawed, had possible predetermined outcomes, or simply did not correctly apply inventory procedure as articulated in BLM Manual 6310, which sets forth the Agency's policy for conducting wilderness characteristics inventory on BLM lands. For example, many of these 2018/ 2019 inventories applied improper boundaries to disqualify all or part of inventory units- i.e. not along a wilderness inventory road120 or other substantial human impact, which does not comply with BLM's current inventory guidelines under Manual 6310.121 Another frequent error and incorrect application of Manual 6310 inventory procedures was BLM's persistent disqualification of an area because it conclusorily determines that one of its wilderness characteristics (opportunities for primitive and unconfined recreation,naturalness,122 and solitude) "does not stand out among other areas." See, e.g., 2018/ 2019 Timber Mountain LWC Inventory at 6-7. Not only is this comparative standard incorrect, it is in violation of Manual 6310, which clearly states that BLM must "not compare the lands in question with other parcels" when assessing potential wilderness characteristics.123 This flawed evaluation of an area's potential for outstanding solitude or primitive recreational opportunities continued in, for example, Upper Kanab Creek, Ladder Canyon, Rock Cove, and Glass Eye Canyon- to highlight larger landscapes with faulty inventories.	Appendix B - RNA Proposals.pdf
Todd	Robin	Maryland Ornithological Society	Lands with wilderness characteristics	Lands with Wilderness Characteristics: Certain areas within the monument have been found to have wilderness characteristics, although they are not within wilderness study areas. The plan should designate them as new wilderness study area under authority of section 202 of the Federal Land Policy and Management Act. These should be managed so as not to impair their suitability for designation as wilderness. Appropriate guidance appears in BLM's Manual 6330 for Management of Wilderness Study Areas.	MOSltrr_GrandStaircaseScopingSep2022.pdf
WARD	EVERETT	N/A	Lands with wilderness characteristics	BLM must manage identified lands with wilderness characteristics for the protection, preservation, and maintenance of those wilderness values.	N/A
Trimble	Stephen	N/A	Lands with wilderness characteristics	As part of backcountry management, the BLM should manage lands with wilderness characteristics for the protection, preservation, and maintenance of those wilderness values. The BLM should once more use its authority (under §202 FLPMA) to designate Wilderness Study Areas as part of ongoing planning. Setting aside deserving new WSAs will add important acreage to the Biden "America the Beautiful" initiative to preserve 30 percent of our nation by 2030.	GSE RMP comments 9-2022.pdf
Woodward	Katie	N/A	Lands with wilderness characteristics	I would first like to draw attention to research relevant to section 2.5.2 for Lands with Wilderness Characteristics. The language in this section dictates not to apply specific provisions for protecting wilderness characteristics, and to manage said lands for multiple uses. It asserts that "any activity would still ensure the proper care and management of the monument objects," without providing any specific management details for how this proper care will occur. There is abundant research which shows that areas with intact wilderness characteristics are critical to landscape-level ecological function and biodiversity conservation. The research highlights that these areas do not operate as independent units, but rather as entire systems in which the degradation of one area inevitably affects long-term environmental outcomes in others. In desert landscapes such as GSENM, this is exemplified by surface-groundwater hydrologic dynamics which influence habitat quality on such a large scale when one area is subject to degradation, the biodiversity of another faces significant and long-term implications.	Woodward_GSENMcomment.pdf
Sjogren	Morgan	N/A	Lands with wilderness characteristics	The BLM needs to conduct a new inventory of lands with Wilderness characteristics, and monitor those areas, and select/manage areas that also have the potential to recover as such.	40 Mile Gulch _ 2 May 2020.pdf
Jackson	Thomas and Marilyn	Star Ranch LLC	Lands with wilderness characteristics	The statement "Utah has long contained extensive roadless and previous unmapped areas, and GSENM is no exception," is ENTIRELY FALSE! If William Lewman's family read that, they could sue for libel! William Lewman mapped the area in 1908, and his maps are still available. Ruth Taylor printed maps in 1935. The Dixie National Forest printed Quad Maps in August of 1964, authored by I. R. Thornton. World Book Encyclopedia printed their 50th Anniversary Edition in 1966, with complete maps of each county. Lincoln Lyman, an Escalante Heavy-Equipment Operator, detailed many of the roads that he was contracted to push in the 1960s. His detailed map is on file in the Garfield County Courthouse. BLM, itself, printed detailed maps in 1999, when it was conducting a Wilderness Study. Each and every section of land was extensively mapped and printed in about twenty blue, inch-thick volumes. (A copy is in the Escalante City library.) After the Wilderness Study failed on a large scale because the very names of places contained family names of ranchers, i.e. Barney Top, Alvey Wash, The Barker Reservoir, etc. Southern Utah quad maps started replacing names of places with longitude, latitude and elevation. Ironically, since BLM/GSENM has stopped maintaining roads, shut out logging and mining, and has closed many of the previous roads, they want the public to believe they are ROADLESS!	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Lands with wilderness characteristics	In May of 1999, BLM proposed making sections of land Wilderness, and spent many dollars studying the concept in about thirty areas. A blue volume of documentation was printed for each area. Meetings elaborated on the fact that these lands still hold 'pristine,' 'natural' 'undisturbed' landscape after nearly 125 years since Escalante was settled. The Wilderness definition given is, "untouched by man." One resident who was very familiar with the lands being studied documented the man-made items such as cabins, corrals, fences, water developments, oil wells, roads, coal mines, road signs, cattle shoots, roads and other man-made items in each of the areas. It was also mentioned that these places had names such as Henry Mountains, Barney Top, Alvey Wash, Powell Point, Griffin Top, Mossy Dell, etc., which came from people who 'touched' them by living and working there. He had his comments typed in an Affidavit, notarized by the Escalante City Clerk, and mailed, certified mail, to BLM who totally ignored them. He was not even listed when they printed a list of commenters. What BLM didn't anticipate was the fact that he had a copy filed at the Garfield County Courthouse, which is available for anyone to see. Ironically, after his comments became known, the new Quad Maps eliminated the people's names in places and replaced them with longitude, latitude and elevation! This has allowed BLM to promote them as roadless, but not surprisingly, use these same roads for Administrative purpose.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Feinberg	Jackie	The Pew Charitable Trusts	Lands with wilderness characteristics	The BLM is required under the Federal Land Policy and Management Act (FLPMA), 43 U.S.C. § 1711 (a) to maintain an inventory of its resources, including lands with wilderness characteristics (LWC), that "shall be kept current so as to reflect changes in conditions and to identify new and emerging resource and other values." As the U.S. Court of Appeals for the Ninth Circuit held (Case No. 05-35931, Oregon Natural Desert Association v. Bureau of Land Management), "wilderness characteristics are among the 'resource and other values' of the public lands to be inventoried under § 1711. BLM's land use plans, which provide for the management of these resources and values are to 'rely to the extent it is available, on the inventory of the public lands, their resources, and other values.'" 43 U.S.C. § 1712 (c) (4). Furthermore, BLM's Manual 6310 states: "[r]egardless of past inventory, the BLM must maintain and update as necessary, its inventory of wilderness resources on public lands." And BLM's Manual 6320 requires the agency to consider LWCs in land use planning, evaluating management alternatives that would protect LWC values as well as evaluating the impacts of the alternatives. Wilderness inventories are to be done on a continuing basis and relevant citizen-submitted data is to be assessed (BLM Manual 6310.04(C)(1)). While BLM conducted an inventory of lands in 2018, its inventory should be updated to ensure that it follows BLM's current guidelines under Manual 6310.	Pew Comments-GSENM Scoping-9-27-22.pdf
Murray	Michael B.	Coalition to Protect America's National Parks	Landscape characteristics (visual resources)	Additionally, we urge BLM to safeguard the high quality, unspoiled scenic byways and backways that connect the planning areas with the parks, particularly Burr Trail and Hole in the Rock Road. The viewsheds along these byways should be maintained as VRM Class I or Class II. These routes are gateways to the adjacent national parks and their quality affects the overall visitor experience in the region.	NPCA & Coalition GSE RMP scoping FINAL.pdf
Murray	Michael B.	Coalition to Protect America's National Parks	Landscape characteristics (visual resources)	Proclamation 10286 specifically recognizes the quality of the dark night skies of GSENM as a resource that must be protected. "The Grand Staircase-Escalante's large, isolated, and, at times, impenetrable landscape is one of the most naturally dark outdoor spaces left in America, providing views of the cosmos that are nearly unrivaled in the contiguous United States, and an opportunity for visitors to encounter a landscape at night, undisturbed by electric lights, in the same way people have experienced the West for most of America's history. According to recent research, over 90 percent of the landscape, or nearly 1.7 million acres, contains pristine night skies, meaning that observers would see no indication of artificial skyglow anywhere in the night sky. Only natural sources of light are visible to the human eye, such as starlight, airglow, aurora, and zodiacal light." Pres. Proc No. 10286, 86 Fed. Reg. 57,335 (Oct. 8, 2021). The Colorado Plateau is one of the last sanctuaries of darkness amidst a rising surge of light pollution with one of the highest concentrations of Dark Sky Places designated by the International Dark Sky Association in the world. Circling GSENM, Capitol Reef, Zion and Bryce Canyon National Parks, Pipe Springs and Cedar Breaks National Monuments and Kodachrome Basin State Park are all designated International Dark Sky Parks, a designation reserved for parks with "exceptional" 8 and well-preserved night sky resources. Torrey is an International Dark Sky Community recognized for adopting "quality outdoor lighting ordinances" Id. and educating their residents about the importance of dark skies. Rainbow Bridge National Monument is a designated International Dark Sky Sanctuary, "the first of its kind in the National Park Service, and distinguishes Rainbow Bridge National Monument for the quality of its naturally dark night skies and the site's cultural heritage." Id. The Kaibab Paiute Tribe earned a designation as the first "dark sky nation" in the world and the Kaibab Paiute reservation is and International Dark Sky Community known as the "Thunder Mountain Pootsee Nightsky."9 8 International Dark Sky Places, available at <a href="https://www.darksky.org/our-work/conservation/idsp/">https://www.darksky.org/our-work/conservation/idsp/</a> 9 Dark Sky over Thunder Mountain Pootseev Nightsky, available at <a href="https://www.intermountainhistories.org/items/show/542">https://www.intermountainhistories.org/items/show/542</a> NPS has recognized dark night skies as an important resource that plays a critical role in natural resource processes and the evolution of species, as well as contributing to the national park visitor experience. NPS Management Policies 2006, § 4.10. People visit International Dark Sky Parks just to experience their dark, night skies, to learn about them through ranger-led interpretive talks and view them through high powered telescopes. Therefore, it is critical that BLM continue to ensure that these qualities are maintained throughout the monument. Similarly, BLM is also required to manage public lands in part for "scenic values," which include night skies. 43 U.S.C. § 1702(c). Under the National Environmental Policy Act (NEPA), BLM must account for the direct, indirect and cumulative impacts of "past, present, and reasonably foreseeable future actions" on night skies. 40 C.F.R. §§ 1502.16, 1508.7, 1508.8. In addition to reducing impacts on night skies and protecting the purity of dark, night skies within the monument, we urge BLM to celebrate and interpret this dwindling resource for monument visitors.	NPCA & Coalition GSE RMP scoping FINAL.pdf
Popejoy	Mike	Grand Canyon Trust	Landscape characteristics (visual resources)	BLM should ensure that scenic values are a public lands resource that is conserved and must establish clear management direction that limits surface disturbance within important viewsheds. NEPA requires that measures be taken to "assure for all Americans ... aesthetically pleasing surroundings." Once established, VRM objectives are as binding as any other resource objectives, and no action may be taken unless the VRM objectives can be met. See IBLA 98-144,98-168, 98-207 (1998). The RMP must make clear that compliance with VRM classes is not discretionary.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Landscape characteristics (visual resources)	Dark night skies are culturally relevant to Tribes and should be managed in consultation and coordination with them.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Landscape characteristics (visual resources)	Grand Staircase-Escalante National Monument should strive to similarly protect its renowned dark night skies by adopting strong management decisions that protect the important night sky resources of the Monument. Before Proclamation 9682, Grand Staircase-Escalante National Monument was in the process of seeking International Dark Sky status. The State of Utah actively promotes protected areas in the state that have achieved such status as part of its tourism strategy and Utah State Parks has adopted a Lightscape Management Plan for its parks that are seeking or have obtained such status. I I I As part of the new management plan and revived effort to be accredited as a dark sky sanctuary, the BLM should prohibit uses that would conflict with accreditation as an International Dark-Sky Association (IDA) International Dark Sky Sanctuary, should conduct an updated lighting inventory, and should include in the management plan a comprehensive lightscape management plan (including an outreach program that includes a visitor education plan and collaborative program for adjacent lands), and a robust set of dark night sky best management practices and direction, including for temporary sources of night sky light pollution. I I I <a href="https://www.visitutah.com/places-to-go/dark-sky-parks">https://www.visitutah.com/places-to-go/dark-sky-parks</a> ; Kodachrome Basin State Park Completed IDSP Application - Revised December 17, 2021, App. C (available at: <a href="https://darksky.app.box.com/s/rtfqhzqouwspoe36rsok5tgagsbugp46/file/763395309352">https://darksky.app.box.com/s/rtfqhzqouwspoe36rsok5tgagsbugp46/file/763395309352</a> ); see also AMP 5-127.	Appendix C - ACECs.pdf



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Popejoy	Mike	Grand Canyon Trust	Landscape characteristics (visual resources)	Issue 2: Protection of Natural Soundscapes Proclamation 10286 notes "The Grand Staircase-Escalante area also provides a remarkable natural soundscape with infrequent human-caused sounds. From popular recreational destinations to remote, isolated locations, acoustic baseline research has found that some of the quietest conditions found in protected areas across the United States can be found in the Grand Staircase-Escalante landscape." Meaningful management of this value is new to this Monument and requires plan direction to ensure this soundscape is not impaired by human caused noise.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Landscape characteristics (visual resources)	Visual resources and scenic quality are Monument objects requiring protection and are important features of the Monument that are necessary to the protection of other Monument objects. As such, it is vital that the landscape's natural and undeveloped scenic values are prioritized. VRM Class I is most protective of visual resources, as it preserves the existing landscape character, while Class IV is least protective of the area's scenic resources, allowing significant change to the existing landscape.	Appendix B - RNA Proposals.pdf
WARD	EVERETT	N/A	Landscape characteristics (visual resources)	I know firsthand that Utah backcountry has ben overwhelmed by the noise of helicopters and other small aircraft and drones in the last five years. BLM must be proactive and plan for increased helicopter noise and set clear, strong guidance to protect natural soundscapes. Without regulations on landing, overflights, and commercial and private operations, Grand Staircase will be inundated by this aerial motorized use.	N/A
Sorenson	Craig	N/A	Landscape characteristics (visual resources)	- As a former guide in for the Grand Staircase Escalante National Monument for several years, I witnessed the importance of protecting these Monument values and resources for the many visitors to this unique landscape visual resources, night skies, and natural and quiet soundscapes, all of which are among the most rare and pristine anywhere in the world.	GSENM Management Plan Comments.pdf
Berry	Scott	N/A	Landscape characteristics (visual resources)	i.GSENM is mandated by Proclamation 10286 to manage for the protection and conservation of landscape characteristics, including visual resources, scenery, dark night skies, natural soundscapes and air quality. Specific non-discretionary management policies, decisions and measuring methods must be adopted that will prevent detrimental impacts to these values. ii.The BLM may consider permitting trivial or nominal impacts to these values on a case-by-case basis, where the request is supported by a well founded demonstration that the exception is required in the interest of public safety, or where granting a de minimis exception will result in much larger degree of protection for another protected value.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Larsen	Hanna	N/A	Landscape characteristics (visual resources)	Visual resources, night skies, and natural and quiet soundscapes -- all of which are some of the most rare and pristine anywhere in the entire world-- deserve protection in this monument.	N/A
Carroll	Lynn	N/A	Landscape characteristics (visual resources)	Much of the monument area has exceptionally dark skies, and the plan should aim to protect this valuable resource. Dark skies are important to migrating birds' ability to navigate at night. They also add to visitors' pleasure and are important for astronomical research.	N/A
Marynowski	Ian	N/A	Landscape characteristics (visual resources)	Seeking dark sky status and promoting/protecting that aspect of the landscape is very important. Not only is it fairly unique and powerful for visitirs to experience. The same can be said for the landscape.	N/A
Not Provided	Not Provided	N/A	Landscape characteristics (visual resources)	The visual resources should be managed to maintain the remoteness for which the Monument is known, including protecting the viewsheds from archaeological and historic sites to preserve the integrity of the setting in those cases. Given that GSENM has pristine night skies, every effort toward protection of these cherished resources that enhance each visitor's experience. How will BLM specifically provide strong protections for these resources, given the great demand for recreation?	GSENM NOI Response.docx
Berry	Scott	N/A	Landscape characteristics (visual resources)	.The BLM should incorporate the highest quality, best available models for measuring potential visual impacts that would result from any proposed action. The exclusive use of existing VRM program standards for determining visual impacts should be revisited and reviewed for application to GSENM. The VRM program was not developed with a focus on the protection of specific places, objects and values, such as those described in Proclamation 10286. The evaluation of visual impacts within GSENM should include consideration of potential visual impacts to the named places and features in Proclamation 10286.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Anderson-Schwartz	Pat	N/A	Landscape characteristics (visual resources)	A "sense of place" includes visual resources, night skies, and quiet natural soundscapes. These pristine vistas and expanses are rare and will not survive without our protection.	BLM Comments.docx
Shelton	Carolyn	N/A	Landscape characteristics (visual resources)	BLM must protect visual resources, night skies, natural and quiet soundscapes – all of which are among the most rare and pristine in the world. GSENM qualifies for and should be designated a Dark Sky Sanctuary, an acknowledgement of the dark skies in this magnificent place.	N/A
J	A	N/A	Landscape characteristics (visual resources)	DARK SKIES & SOUNDSCAPES: One of the primary attractions for me to GSENM is the dark skies and the silence. Some of us use GSENM's silence to keep us sane. Please provide strong language aimed at protecting viewsheds, dark skies, and natural soundscapes.	GSENM_20220923.docx
Orr	Nancy	N/A	Landscape characteristics (visual resources)	Dark skies should be protected, and GSENM should participate in the Dark Skies Program.	N/A
Cox	Steven	N/A	Landscape characteristics (visual resources)	Dark skies, noise pollution and the ability to have opportunities for solitude are increasingly important issues for our society. The monument provides a unique opportunity for people to connect with nature. This is part of the educational value. Areas that provide escape and a deeper connection to nature are certainly important to our society's mental health.	Comments on the Management Plan for the Grand Staircase Escalante National Monument.docx
Berry	Scott	N/A	Landscape characteristics (visual resources)	Night Sky Darkness Assumptions. The BLM should reject an approach that assumes ab initio that the agency has little ability on its own to manage GSENM for the preservation of dark night sky features. Dark night skies are impacted by the accumulation of many individually small behaviors; vehicle headlight use at select places and times, campfire construction, the choice of lighting fixtures. The contribution of these small scale behaviors to impacts to dark night skies should be analyzed, and methods of control discussed and considered.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
C	Peter	N/A	Landscape characteristics (visual resources)	Plus, BLM must set clear, strong guidance to protect natural soundscapes, sensitive wildlife, and visitor experience. Without regulations on landing, overflights, and commercial and private operations, GSENM will be inundated by this aerial motorized use.	N/A
Schwartz	Ephraim	N/A	Landscape characteristics (visual resources)	Preserve the dark skies over the Monument. During my years here I have noticed the degradation of the dark skies with increasing light pollution, especially now that solar powered LEDs can be cheaply purchased. A comprehensive plan to preserve the dark skies needs to be developed and implemented.	GSENM comments.docx
Jorgensen	Helene	N/A	Landscape characteristics (visual resources)	The GSENM has some of best night sky and the lowest levels of light pollution in the United States. The BLM should actively manage the GSENM for maintaining the low light pollution. BLM should develop astro-tourism opportunities that are sustainable for the night sky.	N/A
J	A	N/A	Landscape characteristics (visual resources)	VISUAL: No degradation of visual resources should be allowed. This includes communication towers and utilities. Collect and reference socioeconomic data or visitor experience/preference surveys that support this protection.	GSENM_20220923.docx

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J	A	N/A	Landscape characteristics (visual resources)	With global populations increasing and mounting pressure on public lands, an unpolluted night sky and preserved silence will become more and more important for society and community sanity. GSENM should be an active participant in the Dark Sky Program. Include detailed language about how GSENM plans to prevent light pollution and collaborate with the Dark Sky Program. Include mandatory management direction to protect and improve night skies to ensure that only natural sources of light are visible to the human eye throughout the monument. Explicitly include management direction in the VRM portion of the RMP provisions to protect and improve night skies to ensure that only natural sources of light are visible to the human eye throughout the monument.	GSENM_20220923.docx
Shaffer	Joseph	N/A	Landscape characteristics (visual resources)	Be mindful of protective visual resources and quiet soundscapes and night skies. These features are part of what wilderness means to many people and important reasons that we visit GS-ENM.	N/A
Smith	Margaret	N/A	Landscape characteristics (visual resources)	The soundscape is a dimension that is difficult to quantify, to economically assess, even to record. Yet its value is priceless. It is a fragile quality that is both intimate as well as expansive. It embodies the vastness of the land and yet invites connection. It is, clearly, undecipherable.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Landscape characteristics (visual resources)	Landscape Characteristics including Visual Resources, Scenery, Dark Night Skies, Natural Soundscapes, and Air Quality: Many of these characteristics are important in maintaining the integrity of Traditional Cultural Properties (TCPs) and should be considered for their cultural value in the RMP analysis.	N/A
Pollock	Leland	Garfield County Commission	Landscape characteristics (visual resources)	Each federal agency has its own system for classifying visual resources for scenery management. The most restrictive categories in these systems amount to what is an equivalent to a special designation. These systems are somewhat subjective and lack consistency. We encourage the monument to identify specific visual resources through on-site analysis and focus management toward those rather than broad landscape designations.	Garfield County Commission.pdf
Bunting	Gavin	Bunting Livestock	Terrestrial habitat, vegetation resilience, and conservation	There needs to be continued and increased vegetation & water development projects. These management practices with utilizing mechanical, herbicides, managed fires, and livestock grazing practice. These actions will continue with resulting to the increase of soil and watersheds health. Decreasing possibilities of large wildfire, and increasing all wildlife species as well as continue to produce products that families have been dependent upon for centuries in this area.	N/A
Lish	Christopher	N/A	Terrestrial habitat, vegetation resilience, and conservation	To protect monument objects and values, the BLM should also prohibit mechanical treatments to remove sagebrush, pinyon pine, juniper and other vegetation. Pinyon and juniper trees more than 150 years old are important habitat for wildlife and should be protected. Only native plant species and seeds should be allowed for restoring vegetation and post-fire seeding.	220926_doi-blm-ut-p010-2022-0006-rmp-eis_grand_staircase-escalante.pdf
Anderson-Schwartz	Pat	N/A	Terrestrial habitat, vegetation resilience, and conservation	Use native species for restoration and post fire seeding to encourage the natural environment to thrive and promote healthy populations of native animal species.	BLM Comments.docx
J	A	N/A	Terrestrial habitat, vegetation resilience, and conservation	Vegetation treatments on GSENM should never be made for cattle-related purposes. Sage grouse yes, prairie dog yes, but not cows. I understand the concept of GSENM helping ranchers with fence maintenance because it protects the resource, but any vegetation treatments aimed at increasing forage runs counter to GSENM's mission.	GSENM_20220923.docx
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Terrestrial habitat, vegetation resilience, and conservation	Terrestrial Habitat, and Vegetation Resilience and Conservation (Large-scale and Local Ecotypes) The State has briefly analyzed the benefits of proper grazing/rangeland management and its positive impacts on vegetation communities/ecotypes. The State would encourage the BLM to fully analyze the positive impacts grazing can have on terrestrial habitat, and refer to the analysis contained above.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Pollock	Leland	Garfield County Commission	Terrestrial habitat, vegetation resilience, and conservation	Within the AMS the Monument has recognized the substantial increase of pinyon-juniper woodlands which have invaded landscapes previously dominated by sagebrush. We consider the encroachment of pinyon and juniper trees to be inconsistent with historic vegetative communities and detrimental to upland vegetation and subsequently to wildlife, soil stability, and water quality. We encourage the monument to treat pinyon and juniper trees and noxious weeds where they are identified to be encroaching and actively manage them to reduce their presence.	Garfield County Commission.pdf
Meisenbach	Dan	Canyonlands Conservation District	Vegetation	Best management practices (BMPs) such as treating vast monocultures of pinyon/juniper and decadent sagebrush areas, water developments, reseeding grasses and forbes for livestock and wildlife, and participating with local, state, and federal resources agencies to leverage funding for important conservation projects will benefit the watersheds and landscapes of the vast majority of the monument boundaries.	N/A
Popejoy	Mike	Grand Canyon Trust	Vegetation	NI-1: Use the permanent plots and exclosures installed by earlier researchers. 36 They represent a rare and unique opportunity to continue long-term baseline surveys and analysis. Determining whether changes in exotic plants have taken place over two decades will be useful to prepare for future climate challenges.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Vegetation	VEG-1: Develop models to predict which rare plants, especially those restricted to very rare or mesic habitats, might be most impacted by climate change under various drying and warming scenarios.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Vegetation	Pinyon-Juniper Woodland Expansion: According to the AMS, the BLM used data from the Rangeland Analysis Platform to compare "estimated tree cover using average values between 1986 and 1995 with estimated tree and shrub cover using average values between 2012 and 2022"(p. 5-11). It is noteworthy, however, that the cover estimate from 2012 - 2022 included shrubs while the 1986-1995 estimate did not. This is not a direct comparison of tree cover. The higher percent cover reported in the later period might simply be because it includes shrub cover in the estimate. Additionally, many tree removal projects were conducted from 1986-1995, so the increase in 2012-2022 might just be a return to levels expected for those ecological sites rather than expansion.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Vegetation	Issue 1: Native Plant Species, Especially Native Herbaceous Species Native plant species are significantly impaired in many areas. The expected number of native species, their abundance, and vigor are often a small fraction of what we would see if the sites were at their ecological potential. The issue is to identify impaired ecological sites and then plan design actions to restore impaired sites as rapidly as is practical. The Natural Resources Conservation Service conducted a soil survey of the Monument in 2003 and published a Soil Survey of Grand Staircase-Escalante National Monument Area. This survey concluded: "Much of the rangeland in this survey area has very productive vegetation. However, the current vegetative species populations show the effects of historical grazing overuse. ... The herbaceous ground cover and grazeable forage may be as little as one-fourth of what it should be, resulting in accelerated erosion."2 2 United States Department of Agriculture and Natural Resources Conservation Service, "Soil Survey of Grand Staircase-Escalante National Monument Area, Parts of Kane and Garfield Counties, Utah" (2003). All U.S. Government Documents (Utah Regional Depository). Paper 410. <a href="https://digitalcommons.usu.edu/govdocs/410">https://digitalcommons.usu.edu/govdocs/410</a>	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Vegetation	There is an urgent management need for objective data and independent research and analysis of the effects of restoration activities on GSENM. We propose the establishment of a formal system of reference areas across the Monument that represent reference communities for as many vegetation types and successional phases as possible. If undisturbed reference areas cannot be located, large exclosures should still be installed in the best examples of those systems. These areas would not have livestock grazing or any other activities that altered vegetation (including significant recreation impacts). Such a system would serve two primary purposes. The first would be to provide information that could inform grazing management elsewhere on the Monument. These areas could provide baseline information on site potential, which is not available in many areas on the Monument. The second purpose would be to provide a system of potential research sites for interested scientists. An added benefit could be the protection of cultural sites from impacts by cattle or other disturbances. There are few ungrazed sagebrush communities on GSENM that can be used as reference areas. However, the linear right-of-way along Highway 89 has not been grazed since the fences were installed in the 1950s. It has served as a reference area to compare with grazed areas. 29 Big Bowns Bench and No Man's Mesa are also candidates. 29 See 2003 rangeland health assessment training files at GSENM headquarters.	Appendix A - Figures & Tables.pdf
Todd	Robin	Maryland Ornithological Society	Vegetation	Vegetation Treatments: The plan should bar mechanical treatments to remove sagebrush, pinyon pine, juniper, and other vegetation. MOS members have seen the results of such treatments elsewhere in southern Utah, intended to provide better livestock grazing. The resulting habitat has less value for birds and native mammals. Re-seeding after fire or restoration activities should use only native species. Within a national monument, the priority should be to protect native ecosystems.	MOSltrr_GrandStaircaseScopingSep2022.pdf
Trimble	Stephen	N/A	Vegetation	A related concern: I urge you to prohibit mechanical treatments of sagebrush, piñon-juniper forest, and other vegetation. Chaining, mastication, harrowing, and other heavy-machinery removal methods harm monument objects. The original Monument Management Plan recognized these impacts. These treatments are done solely to benefit livestock, not to protect Monument objects and values like relic vegetative communities, old-growth piñon-juniper forest, and biological soil crust. In Utah, 85 percent of archaeological sites are found in p-j; mechanical treatments may damage irreplaceable cultural resources. For this same reason, BLM must only use native species when restoring and reseeding areas within the Monument, including after wildfire. In 2019, conservation biologists at the Wild Utah Project completed a review of decades of research on the "treatment" of piñon-juniper woodland. They found that 70 percent of the time, these efforts do not create the intended boost in range quality, either yielding no measurable effects or actually proving harmful. Possible consequences for resident animals vary-from benefits to sage grouse in rare wet springs, to unknown impacts on a vast number of invertebrates and small mammals, to catastrophic harm to pinyon jays. Jay populations have declined by 84 percent since 1970 and are projected to lose another 50 percent in the next 20 years. Piñon-juniper forest is a named "object" in the proclamation requiring protection. The management plan must respond by protecting these ecological communities. Large expanses of sagebrush with grasses and wildflowers eaten down to nubs by cattle do not constitute "restoration" or "protection."	GSE RMP comments 9-2022.pdf
Spotts	Richard	N/A	Vegetation	BLM's GSENM vegetation treatment projects are controversial because they may mostly benefit ranchers and game hunters rather than restore biological diversity and ecological health. BLM should not be promoting pinyon-juniper (PJ) eradication projects in those areas where PJ normally existed. Where PJ has moved into other habitat types, it is generally because of past BLM fire suppression or excessive grazing that removed fine fuels and changed fire ecology in ways that benefitted PJ.	N/A
Holmes	Jenny	N/A	Vegetation	GSENM lands are also valuable for climate protection and adaptation and the new management plan should have strong climate change component to reflect the state of science 22 years after the first management plan. Mechanical treatments of pinion pine, juniper and sagebrush should be prohibited. These "treatments" reduce native species and biodiversity and reduce carbon sequestration.	N/A
Sjogren	Morgan	N/A	Vegetation	Native Seeding Non-native seeding, crested wheatgrass, outcompetes and threatens native plant species. This practice does not align with the monument proclamation to protect native and endemic plant species as monument objects. On my hikes I have been fascinated by learning the plant species and realizing just how many are non-natives and invasives. Witnessing endemic plants helps establish a unique sense of place for all who visit the monument and is essential to maintaining the habitat for wildlife. These native seeds should be identified and catalogued. GSENM should create a reserve of GSENM-adapted seeds and genetic tissues for restoration and research.	40 Mile Gulch _ 2 May 2020.pdf
Alderson	George and Frances	N/A	Vegetation	The new plan should bar the use of mechanical vegetation projects such as chaining or mastication. Over the past 50 years we have seen the results of such projects in Washington County, in Tooele County and Box Elder County. They are diametrically opposed to the values for which GSENM was designated. Wildlife habitat was gone and would take years to recover. The plan also should bar the use of non-native species in restoration projects.	N/A
Not Provided	Jaden	N/A	Vegetation	2. No mechanical treatments. Only native species when replanting occurs.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Sjogren	Morgan	N/A	Vegetation	Both proclamation 6920 and 10826 declare that endemic plants are monument objects in need of protections, but 10826 also notes 15 sensitive species native to Utah, and six rare or endemic plants that are "imperiled" or "critically imperiled" species. 50 Percent of Utah's flora are found within the monument. The impacts of grazing and drought conditions endanger the future of these flora communities. The frequency of which I witness grazing impacts within the monument makes it clear that a shift in grazing management needs to occur that prioritizes endemic plants as monument objects. It is common to see all vegetation chewed up by cattle and delicate biocrusts and spring areas trampled or polluted with feces. All vegetations should be managed in such a way that supports and allows for traditional uses by Tribal members. I have read the Bears Ears Inter-Tribal Coalition's tribal Land Management Plan for Bears Ears National Monument and it stands as a prime example of how this can be accomplished. This spring I joined a team of ecologists in the field to learn about the Native Plant species that occur in the tributaries of the Glen Canyon NRA, which is similar to the riparian areas of the adjacent Grand Staircase-Escalante National Monument, specifically the Escalante River. I witnessed firsthand how these Native Plants are being impacted by invasive plants (especially Russian olive, tamarisk, and non-native grasses) and cattle impacts (overgrazing, polluted springs, and erosion) and as a result not thriving as they should in this landscape. National and state ecological standards require BLM to describe the Desired Plant Community (DPC) for a site based upon its climax state or ecological potential. This needs to be done for native plants to be protected as monument objects within GSENM. The monument was established to restore and protect native plant life ecosystems, and yet, upland vegetation continues to be overgrazed by livestock. Vegetation treatments (like chaining) used before planting non-native grasses like crested wheatgrass and Russian wild rye further obscure this monument objective. These destruction of older Pinyon and Juniper woodlands through chaining and burning threatens the regrowth of these ancient endemic species and threatens the Wilderness characteristics that this monument is aimed to protect, therefore these practices are not compatible with GSENM monument proclamations. 85% of the pinyon jay population was lost between 1967 and 2015, it is too great a risk to decimate the remaining populations through the practice of chaining.	40 Mile Gulch _ June 2018.pdf
Berry	Scott	N/A	Vegetation	i.Has the R-A-D model been adopted and implemented at GSENM? ii.Do the proposed alternatives include consideration of reductions in grazing load proportional to its contribution to impacts? iii.Has GSENM identified the extent of the climate change contribution to the expansion of noxious weeds and invasive plants?	RAD Management (2).pdf
Carroll	Lynn	N/A	Vegetation	Mechanical removal of sagebrush, pinyon pine, juniper, and other vegetation is not conducive to protection of monument objects and the wilderness, scenic, cultural, and ecological values of lands within the monument. It should not be included in the plan.	N/A
Berry	Scott	N/A	Vegetation	.Restoration; Proposed vegetation restoration actions must be initially investigated and analyzed within the R-A-D framework, for practicality and efficacy, and compliance with the conservation and protection goals contained in Proclamation 10286.	RAD Management (2).pdf
Berry	Scott	N/A	Vegetation	Adopt and implement the Resistance-Acceptance-Direction model for understanding and responding to change in the vegetation regime at GSENM. Management Foundations for Navigating Ecological Transformation by Resisting, Accepting or Directing Social-Ecological Change , Magness, et. al.	RAD Management (2).pdf
Berry	Scott	N/A	Vegetation	An agency affirmation that non-native seed will not be used in projects that involve re-seeding, and that the purpose of re-seeding shall be to promote conservation and protection of ROV's at GSENM, rather than directed at "restoring" vegetation to a pre-existing condition.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Weaver	Brad	N/A	Vegetation	Chaining and other large-scale methods for vegetation removal should be prohibited in the GSENM Management Plan.	GSENM Scoping Comments.pdf
Carroll	Lynn	N/A	Vegetation	Every effort should be made to use seeds of native plants in reseeded projects.	N/A
J	A	N/A	Vegetation	GSENM should be maintaining a robust geospatial database of where any vegetation treatments occur so spatial and temporal analyses can be performed to evaluate cumulative effects.	GSENM_20220923.docx
J	A	N/A	Vegetation	I don't want to see language in this plan about management for the recovery of naturalized or introduced species. Instead, I'd like to see language about the protection of biodiversity and species resiliency, the removal of invasive species, and education for visitors on cryptobiotic crust and native plant communities. Priority should be in perpetuating native plant ecosystems and ecosystem function. I want specifics on protections/preservation/restrictions for relict plant communities and hanging gardens.	GSENM_20220923.docx
Shelton	Carolyn	N/A	Vegetation	Non-native species should not be used for post-fire or any restoration seeding.	N/A
Berry	Scott	N/A	Vegetation	Pinyon / Juniper Expansion. Prepare a scientific report incorporating high quality science investigating and analyzing to what extent P/J expansion is an artifact of European settlement in the GSENM region, a natural expansion into areas now environmentally suitable for P/J, or a process driven by accelerated climate change.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Anderson-Schwartz	Pat	N/A	Vegetation	Prohibit mechanical treatments of sagebrush, juniper, pinyon pine, and rabbit brush. Chaining for grazing has been ineffective for cattle and devastating to wild ecosystems. They do not recover quickly.	BLM Comments.docx
Berry	Scott	N/A	Vegetation	Reconsideration and review of "restoration" as a practical and accomplishable goal for vegetation management in the face of accelerating climate change.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Rubin	David	N/A	Vegetation	Vegetation management-"Chaining" of P-J forests should be prohibited, because it prioritizes grazing over protection of native vegetation. Moreover, it leads to increased soil erosion and increased dust in the air. A recent review of chaining on these lands (Redmond et al., 2013, Forest Management and Ecology, v. 305, p. 120-128.) reported that: "Treated areas had higher bare mineral soil cover and lower biocrust cover, which may influence soil erosional processes." As a professional sedimentologist who has studied deserts around the world and on Mars, I know that subjecting bare areas to winds causes dust clouds.	2017 Rubin et al Geology.pdf
Ward	Linda	N/A	Vegetation	BLM must prohibit mechanical treatments of sagebrush, pinyon pine and juniper, and other vegetation. This includes chaining, mastication, harrowing, and other heavy-machinery removal methods that, as recognized in the original Monument Management Plan, have too much potential to harm monument objects. For this same reason, BLM must only use native species when restoring and reseeded areas within the Monument, including after wildfire.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Kisko	Michael	N/A	Vegetation	I am most concerned about the mechanical treatments of sagebrush, pinyon pine, juniper, and other vegetation. These treatments could lead to erosion of what little soil is present. And reseeding with non-native plant species could add to the damage. I would like to see these practices prohibited and leave the natural sagebrush, pinyon pine and juniper ecosystem intact. Also, only native species should be used for restoration and post-fire seeding.	N/A
LeFevre	Mason	N/A	Vegetation	Since the area was declared a monument, a much more hands-off approach to management has been adopted. The Chainings and Re-seeds have not been maintained nor have any new vegetative treatments been implemented. Within a period of 15 years the decline in wildlife in the area was perceptible. Many of the chained areas are no longer recognizable due to the amount of Juniper encroachment. Areas that were not treated historically are now mostly a monoculture of Juniper, what understory there was is choked out and decadent. Erosion has accelerated and water tables have dropped.	N/A
Not Provided	Not Provided	N/A	Vegetation	Protect narrow canyons. Canyon bottoms are home to sensitive plants. Cattle trample them and foul streams and creeks.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Vegetation	Terrestrial Habitat, and Vegetation Resilience and Conservation: We understand that climate change will have an effect on the sustainability of restoration projects and the viability of certain native ecosystems, so we would like to see a balanced management schema that is responsive to climate change and retains important native plants. We will work to compile a list of culturally important plants to guide these types of management activities.	N/A
Corbato	Steve	Oregonians For Wild Utah	Vegetation	o To protect unique Monument resources and values like relic vegetative communities, old-growth pinyon pine and juniper forest, and biological soil crust, BLM must prohibit mechanical treatments of sagebrush, pinyon pine and juniper, and other vegetation.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Vegetation	There were wild berries, potatoes, sego lilies, watercress, and wild onions which have not been given proper care, and managers dismissed the idea of the work involved to get there without vehicle-safe roads!	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Vegetation	Additionally, the BLM should evaluate the need to remove some vegetation (nonnative as well as native but encroaching), and the need to introduce other vegetation (both native and nonnative but desirable species) to restore and protect wildlife habitat	GSENM RMP Scoping Comments 27SEPT2022.pdf
Campbell	Todd	University of Tampa	Vegetation	There are 855,700 total acres of woodlands within GSENM. The 2020 RMP allows commercial and noncommercial fuelwood harvesting, post cutting, and Christmas-tree cutting in most areas except designated wilderness study areas. The two dominant woodland types are Colorado Plateau Pinyon-Juniper and Colorado Plateau Pinyon-Juniper Shrubland. Harvesting a low amount of wood can be good to reduce the high fuel loads that affect wildfires. The Pinyon-Juniper has expanded the most due to grazing, changes in fire regimes and climate change. Since this plant is woody, it dominates and out-competes the shorter shrubs and brush species. Due to a decline in precipitation, some vegetation that is essential for larger animals that feed off of them (such as the elk) would have to go somewhere else. This shift in diversity leads to many issues such as poor soils, vegetation structure, carbon storage and wildlife biodiversity to name a few.	N/A
Popejoy	Mike	Grand Canyon Trust	Noxious weeds and invasive nonnative plants	Cheatgrass: The AMS cites the annual herbaceous species layer (Cheatgrass - Rangeland Analysis Platform) created by Maestas et al. 2020 18 to support their position that cheatgrass is extensive on GSENM, so fire risk is increasing and should be managed with fuel reduction treatments ("cover greater than 1 percent of invasive annual grasses translates to higher fire frequency" p. 5-13). However, the map shows that the cover of herbaceous annual vegetation on most Monument rangelands is 0-10%, which the authors characterize as "low." Additionally, the map shows all annual herbaceous coverage, native and non-native, because the model assumes that total herbaceous cover is a good surrogate for cheatgrass cover. The AMS presents a similar coverage map (Fig. 5-3) based on this model that shows that cheatgrass cover over most of the Monument's non-forested rangelands is 0-5%. Other data sets also show that although cheatgrass is present throughout much of GSENM, cover has remained low. 19 Research from the Great Basin also shows that fire risk can best be predicted by the amount of fine fuels, and that trees and shrubs by themselves do not increase the probability of wildfire.20 18 Maestas, J., M. Jones, N. J. Pastick, M. B. Rigge, B. K. Wylie, L. Garner, M. Crist, et al. (2020) Annual Herbaceous Cover across Rangelands of the Sagebrush Biome: U.S. Geological Survey data release, Annual Herbaceous Cover across Rangelands of the Sagebrush Biome - ScienceBase-Catalog 19 Stohlgren, T.J., Y. Otsuki, C.A. Villa, M. Lee, and J. Belnap. (2001) Patterns of plant invasions: a case example in native species hotspots and rare habitats. Biological Invasions 3:37-50. 20 Smith, Joseph T., Brady W. Allred, Chad S. Boyd, Kirk W. Davies, Matthew O. Jones, Andrew R. Kleinhesselink, Jeremy D. Maestas, David E. Naugle. (2022) Where There's Smoke, There's Fuel: Dynamic Vegetation Data Improve Predictions of Wildfire Hazard in the Great Basin. Rangeland Ecology & Management. In press. <a href="https://doi.org/10.1016/j.rama.2022.07.005">https://doi.org/10.1016/j.rama.2022.07.005</a> Further, Maestas et al. 21 qualify that "this data product is best suited to highlight patterns of invasive annuals where they are known to be widely distributed." The model may not be "best suited" for GSENM where cheatgrass has relatively low cover over most of the Monument. It is noteworthy that the model excludes forested areas, which is the dominant vegetation type on over half of GSENM. In other words, there is no information from this model on the presence of cheatgrass where most fuels reduction treatments are proposed. 21 Maestas, J., M. Jones, N. J. Pastick, M. B. Rigge, B. K. Wylie, L. Garner, M. Crist, et al. (2020) Annual Herbaceous Cover across Rangelands of the Sagebrush Biome: U.S. Geological Survey data release, Annual Herbaceous Cover across Rangelands of the Sagebrush Biome - ScienceBase-Catalog That's not to say cheatgrass is not a concern. But the AMS has not made the case that the risks from wildfire are greater than the risk of cheatgrass invasion. Before any more areas on the Monument are treated, it is vital to know whether the surface disturbance of a vegetation treatment would exacerbate cheatgrass spread and actually increase fire risk. Research indicates that if cheatgrass is present before a treatment it will return afterwards, especially on warm, dry sites.22 Implementing a fuels treatment that facilitates expansion of cheatgrass would be a disastrous outcome that might exacerbate rather than reduce risk of wildfire. 22 Maestas, J., M. Jones, N. J. Pastick, M. B. Rigge, B. K. Wylie, L. Garner, M. Crist, et al. 2020. Annual Herbaceous Cover across Rangelands of the Sagebrush Biome: U.S. Geological Survey data release, <a href="https://doi.org/10.5066/P9VL3LD5">https://doi.org/10.5066/P9VL3LD5</a> .	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Noxious weeds and invasive nonnative plants	In addition, the Paria River system is in need of an inventory of woody invasive species so that a treatment plan can be developed. No work to date has been done to quantify or map the location or level of infestation of Russian olive and/or tamarisk in the Paria watershed, and BLM should make it a priority to conduct the necessary surveys (or support partner organizations to do so) such that its ecological, economic, and recreational value is preserved in a condition consistent with its status as a designated Monument object.	Appendix B - RNA Proposals.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Noxious weeds and invasive nonnative plants	Non-native plants may be used in limited, emergency situations to protect Monument resources by stabilizing soils, displacing noxious weeds, and safeguarding site productivity only when it can be proven that native species are inadequate to respond to this situation. Degraded vegetation with functional groups that have an extreme degree of departure from expected conditions are not emergencies qualifying for the use of non-native seed. An emergency is a condition in which negative impacts to natural resources would result in the immediate, catastrophic degradation of soil, hydrology, or biotic conditions (e.g., drought or fire). These impacts would hinder re-establishment of native communities, and remedial action must be taken as soon as possible to prevent further resource degradation. In these situations, the restoration plants selected will be short-lived nurse crop species that are not competitive with natives, will not persist longer than a few years, and are unlikely to spread from the project site. In addition, they will be combined with native species to facilitate the ultimate establishment of native communities.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Noxious weeds and invasive nonnative plants	The AMS states that "No federally designated noxious weeds are known to occur in the planning area" (sec. 5.2.1), but the federal noxious weed list is not very meaningful since it does not include many noxious weeds of Utah. It would be more appropriate to use the Utah State noxious weed list ( <a href="https://ag.utah.gov/farmers/plants-industry/noxious-weed-control-resources/state-of-utah-noxious-weed-list/">https://ag.utah.gov/farmers/plants-industry/noxious-weed-control-resources/state-of-utah-noxious-weed-list/</a> ). The 2000 MMP directs the Monument to control noxious weeds according to State policies and directives. The State list of noxious weeds includes the following plants that are probably (those we have observed in the Monument are marked with (*)): - Bermudagrass (Cynodon dactylon) - Canada thistle (Cirsium arvense) - Field bindweed (Convolvulus arvensis) - Hoary cress or whitetop (Cardaria draba)* - Houndstongue (Cynoglossum officianale) - Johnsongrass (Sorghum halepense)* - Leafy spurge (Euphorbia esula) - Poison hemlock (Conium maculatum) - Puncturevine or goathead (Tribulus terrestris)* - Quackgrass (Elymus repens) - Ravenna grass (Saccharum ravennae)* - Russian knapweed (Acroptilon repens)* - Russian olive (Elaeagnus angustifolia)* - Scotch thistle (Onopordum acanthium)* - Tamarisk or salt cedar (Tamarix ramosissima)* Other weeds of concern that we have observed in the Monument include bull thistle (Cirsium vulgare), cheatgrass (Bromus tectorum), and prickly Russian thistle (Salsola tragus).	Appendix C - ACECs.pdf
Berry	Scott	N/A	Noxious weeds and invasive nonnative plants	i.Adopt and implement the Resistance-Acceptance-Direction model for understanding and responding to noxious weed and invasive plant issues and concerns at GSENM. Management Foundations for Navigating Ecological Transformation by Resisting, Accepting or Directing Social-Ecological Change , Magness, et. al. In addition, incorporate the best high quality climate science into the R-A-D model. The goal of adopting this model should be to improve the present understanding of the extent to which noxious weed and invasive plant expansion is subject to climate change factors.	RAD Management (2).pdf
Sjogren	Morgan	N/A	Noxious weeds and invasive nonnative plants	Noxious and Invasive Nonnative Plants The presence of noxious and invasive nonnative plants is an unpleasant and discouraging aspect of hiking in the monument. Not only do many of these stick to your socks or pierce your skin, but each time also they do, it is a reminder of how much the native flora are being forced to compete with invasive plants. The AMS says that no noxious and invasive plants exist in the planning area, but that is untrue. I frequently encounter the following noxious weeds of Utah while hiking and camping in the monument: Bermudagrass (Cynodon dactylon), Canada thistle (Cirsium arvense), Puncturevine or goathead (Tribulus terrestris), Ravenna grass (Saccharum ravennae), Russian olive (Elaeagnus angustifolia), Tamarisk or salt cedar (Tamarix ramosissima), prickly Russian thistle (Salsola tragus). Cheatgrass has a major impact on native plant species and is abundant in the monument. These noxious invasive weeds need to be the focus of eradication efforts, which needs to include limiting the activities that help them spread such as grazing cattle. Both the Escalante and Paria Rivers are affected by several species of noxious and invasive non-native plants which impacts the sensitive riparian ecosystems. The BLM needs to take over the previous efforts of the Escalante River Watershed Project to continue work implementing treatments to remove tamarisk and Russian olive in these watersheds. I often hike with a former Escalante River Watershed Project employee who shows me where new Russian olive growth is occurring. Past eradication efforts will have been futile if this is not maintained. The Paria River needs to be surveyed to determine and plan for efforts to eradicate woody invasive species as well.	40 Mile Gulch _ 2 May 2020.pdf
Alderson	George and Frances	N/A	Noxious weeds and invasive nonnative plants	Vegetation management: We favor restoration projects such as removal of non-native russian olive and tamarisk.	N/A
J	A	N/A	Noxious weeds and invasive nonnative plants	I'd like to see specifics about how you will prioritize invasive species removal (plant and wildlife) in areas where SS and T&E species exist. Do not narrow the definition of invasive to just those species that have been declared noxious. Be proactive. Chaining as a veg treatment should only be allowable for fire-related or SS/T&E species-related purposes.	GSENM_20220923.docx
Weaver	Brad	N/A	Noxious weeds and invasive nonnative plants	Intentional or accidental Introduction of non-native plants inside the GSENM should be prohibited. Rules to prevent accidental introduction of non-native plants by horses and livestock should be established and enforced.	GSENM Scoping Comments.pdf
Berry	Scott	N/A	Noxious weeds and invasive nonnative plants	Investigate, analyze and quantify the contribution of the recognized ground disturbing factors (grazing, vegetation management, road construction, etc. ) contributing to the expansion of noxious weeds and non-native plants, and propose alternatives for the management of these factors;	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Sutter	Eileen	N/A	Noxious weeds and invasive nonnative plants	There should be a high priority given to maintaining and increasing native plant communities. On a recent visit to Lower Calf Creek Falls, I saw the parts of the streambed were overrun with non-native invasive phragmites. The Management Plan should include steps to reduce invasive species like phragmites, and replace, through a program of seeding, with plants native to this part of the Colorado Plateau.	Comments for 2022729 GSENM RMP FR Notice of Intenet 2022.docx
Slovak	Mark	N/A	Noxious weeds and invasive nonnative plants	Any vegetation management should be focused on removal of invasive species to include russian olive or tamarisk	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Noxious weeds and invasive nonnative plants	Noxious Weeds and Invasive Nonnative Plants: As much as possible we encourage the use of careful and targeted use of herbicides especially around springs and other water sources. Types of herbicides and their appropriate uses should be evaluated in the NEPA process. Cattle grazing and ORV uses are recognized to contribute to the spread of invasives so limiting these activities will be an effective tool in management.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Noxious weeds and invasive nonnative plants	Table 5-8 and Figure 5-3, Appendix B Re-seeding of Little Valleys with crested wheatgrass and Russian wild rye has not increased the number of AUMS, and has necessitated prescribed fire and chemical treatment! We were particularly disturbed by 5.1.2 Trends. "Community conversion has also occurred because of invasive plant spread." We wish to remind the reader that it was BLM employee, Jimmy Gatherum who introduced Russian Olive to the streambeds, and under Donald Gipe of the Kanab Office that Kosha Weed, Goat Heads, and cheat grass were introduced.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Noxious weeds and invasive nonnative plants	Noxious Weeds and Invasive Nonnative Plants The BLM has identified invasive non-native species as an issue for consideration but fails to identify encroaching or invasive native species such as Pinyon-Juniper trees. The BLM needs to look at the negative impacts of invasive and encroaching native plants such as Pinon and Juniper trees. The treatment and removal of encroaching pinyon-juniper and other vegetative species provide substantial benefits to wildlife habitat, vegetative health, and rangeland. The removal of pinyon-juniper encroachment is vital to invigorate perennial forbs and grasses, sagebrush-steppe communities, and other forest communities. The detrimental effects of encroachment on vegetative communities includes pinyon-junipers consuming large amounts of moisture and nutrients,(36) blocking sunlight from reaching non-shade tolerant vegetation, increased percentages of bare ground,(37) increased levels of runoff and erosion,(38) and reduced sagebrush cover, plant diversity, and native tree species.(39) These same negative effects harm the ability of sagebrush-steppe communities to provide forage for domestic livestock and wildlife grazing.(40,41) Active management and removal of encroaching pinyon-junipers will benefit native plant communities, wildlife habitat,(42,43) and domestic livestock grazing.(44,45,46) Additionally, reseeding after encroachment removal is vital to ensure that native vegetation is re-established in previously encroached areas rather than invasive plants such as cheatgrass.(47) The BLM should consider the use of desirable non-native species alongside native species during the reseeding process to improve forage resiliency, prevent erosion, and combat invasive species establishment.(48) Improved native plant communities result in a higher quality of wildlife habitat, thus increasing tourism and hunting-related income. (36) Roundy, B. A., Young, K., Cline, N., Hulet, A., Miller, R. F., Tausch, R. J., Chambers, J. C., and Rau, B. 2014. Pinon-Juniper Reduction Increases Soil Water Availability of the Resource Growth Pool. Rangeland Ecology and Management 67 (5): 495-505. (37) Petersen, S. L., Stringham, T. K., Roundy, B. A. 2009. A Process-Based Application of State-and-Transition Models: A Case Study of Wester Juniper (Juniperus occidentalis) Encroachment. Rangeland Ecology Management 62:186-192. (38) Pierson, F. B., Williams, J. C., Kormos, P. R., Hardegree, S. P., Clark, P. E., Rau, B. M. 2010. Hydrologic Vulnerability of Sagebrush Steppe Following Pinyon and Juniper Encroachment. Rangeland Ecology Management 63:614-629. (39) Miller, R. F., Svejcar, T. J., and Rose, J. A. 2000. Impacts of Western Juniper on Plant and Community Composition and Structure. Journal of Range Management 53 (6): 574-585. (40) Bates, J. D., Miller, R. F., and Svejcar, T. J. 2000. Understory Dynamics in Cut and Uncut Western Juniper Woodlands. Journal or Range Management 53: 119-126. (41) Coultrap, D. E., Fulgham, K. O., Lancaster, D. L., Gustafson, J., Lile, D. F., George, M. R. 2008. Relationships Between Western Juniper (Juniperus Occidentalis) and Understory Vegetation. Invasive Plant Science Management 1 (1): 3-11. (42) Cheng, E. and Ritchie, M. E. 2006. Impacts of Simulated Livestock Grazing on Utah Prairie Dogs (Cynomy Parvidens) in a Low Productivity Ecosystem. Oecologia 147 (3): 546-555. (43) Dyke, F. V. and Darragh, J. A. 2006. Short and Long-Term Changes in Elk Use and Forage Production in Sagebrush Communities Following Prescribed Burning. Biodiversity and Conservation 15 (14): 4375-4398. (44) Bates, J. D., Miller, R. F., and Svejcar, T. J. 2000. Understory Dynamics in Cut and Uncut Western Juniper Woodlands. Journal or Range Management 53: 119-126. (45) Clary W. P. and Jameson, D. A. 1981. Herbage Production Following Tree and Shrub Removal in the Pinyon-Juniper Type of Arizona. Journal of Range Management 34 (2): 109-113. (46) Coultrap, D. E., Fulgham, K. O., Lancaster, D. L., Gustafson, J., Lile, D. F., George, M. R. 2008. Relationships Between Western Juniper (Juniperus Occidentalis) and Understory Vegetation. Invasive Plant Science Management 1 (1): 3-11. (47) Coultrap, D. E., Fulgham, K. O., Lancaster, D. L., Gustafson, J., Lile, D. F., George, M. R. 2008. Relationships Between Western Juniper (Juniperus Occidentalis) and Understory Vegetation. Invasive Plant Science Management 1 (1): 3-11. (48) Bybee, J., Roundy, R. A., Young, K. R., Hulet, A., Round, D. B., Crook, L., Aanderud, Z Z., Eggett, D. L., Cline, N. L. 2016. Vegetation Response to Pinon and Juniper Tree Shredding. Rangeland Ecology and Management 69: 224-234. The benefits of actively managing pinyon-juniper encroachment in Utah are well documented and should not be ignored. The BLM must disclose the beneficial impacts of pinyon-juniper treatment and the negative impacts on the land if these treatments are not authorized.	GSENM RMP Scoping Comments 27SEPT2022.pdf
McCoy	Melissa	U.S. EPA Region 8	Noxious weeds and invasive nonnative plants	Invasive Species In the Draft EIS, we recommend including measures that are consistent with Executive Order 13112 on Invasive Species. We suggest including any existing BLM direction for noxious weed management, a description of current conditions, and BMPs which will be utilized to prevent, detect, and control invasives in the planning area. Discuss measures that would be implemented to reduce the likelihood of introduction and spread of invasive species within the proposed planning area. We encourage BLM to promote integrated weed management, with prioritization of management techniques that focus on non-chemical treatments first, and mitigation to avoid herbicide transport to surface or ground waters. Early recognition and control of new infestations is critical to stop the spread of the infestation and avoid wider future use of herbicides, which could correspondingly have more adverse impacts on biodiversity, water quality and fisheries.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf
Campbell	Todd	University of Tampa	Noxious weeds and invasive nonnative plants	Alternatives that reduce the amount of human recreation, especially vehicles that can disrupt soil crusts and increase the spread of invasive species, would be best for preventing the spread of cheatgrass and uncharacteristic wildfires in GSENM. This is also applicable to alternatives that reduce grazing for the same reasons. The best alternative would be E reducing both grazing and recreation. There would also need to be additional resources put towards documenting trends in the special status species of plants.	N/A

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Campbell	Todd	University of Tampa	Noxious weeds and invasive nonnative plants	Invasive plants are species that have a high potential to hurt the ecology, economy, or human health. These plants are easily distributed and spread quickly. There are numerous vectors of introduction of invasive species including rivers, vehicle use, wind, wildlife, livestock, and humans. Once established, factors that increase the spread are disturbed soil and existing invasive species nearby. The threat of invasive species is increased with human activity. The management plans that would increase ground disturbance such as human visitation, continued livestock grazing, and routine GSENM operations all increase the potential spread of invasive plants. Climate change can also increase the spread of invasive species by widening their ecological niche range. Rapid Ecoregional Assessment predicted an 85 percent increase in invasive species distribution within the region including the decision area by 2025. Invasive grasses are of a high concern in the GSENM designated area. The most predominant invasive grass species is Bromus tectorum widely known as cheatgrass. Rangeland health assessment from 2000 to 2003 found cheatgrass at 32% of riparian sites and 54% in upland sites. This grass alters ecosystem processes such as fire regimes (Bradley et al. 2018). Cheatgrass is associated with lower abundance and richness of small animals and reduces the habitat for the Sage Grouse (Bradley et al. 2018). GSENM had about 16% of monitored plots with over 1% invasive grass cover putting GSENM at high risk of catastrophic fire. Post-burn areas where fire disturbed the soil and displaced native plants have a high level of cheatgrass invasion. Grazing increases the risk of cheatgrass because it disrupts the biological soil crust cover and the native perennial herbaceous cover. Without these, the invasive plant is left with an opening to spread and increase its cover. Then with the increased covering of cheatgrass, fire is more likely to continue more frequently, disturbing more soil. This creates a feedback loop of more cheatgrass and more fire. Fire frequency probability is the same at low and high levels of cheatgrass cover so even small amounts of cheatgrass increase the risk of fire (Bradley et al. 2018). Bradley, B.A., Curtis, C.A., Fusco, E.J. et al. Cheatgrass (Bromus tectorum) distribution in the intermountain Western United States and its relationship to fire frequency, seasonality, and ignitions. 2018. Biol Invasions 20, 1493-1506.	N/A
King	Catherine	Utah Native Plant Society	Noxious weeds and invasive nonnative plants	UNPS opposes any mechanical or chemical vegetation treatments in GSENM. Those mechanical treatments disturb the soil and can facilitate invasion of cheatgrass and other weeds. We oppose any seedings of species that are not native to Utah in GSENM.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Noxious weeds and invasive nonnative plants	Thousands of acres of GSENM have been "treated" over the past half century including removal of much pinyon, juniper and sagebrush. Many of those treatments were followed by seeding of non-native grasses and other forage species for livestock. This has resulted in a shift from native to non-native species, which we oppose. Pinyon-juniper woodlands in GSENM include many old-growth trees that are valuable for a host of ecological services that are not provided by younger mature trees. They may harbor superior genotypes that have allowed them to survive environmental stress, including episodes of prolonged drought and elevated temperatures, over hundreds of years.	UNPS on GSENM 2022 (1).docx
Pollock	Leland	Garfield County Commission	Noxious weeds and invasive nonnative plants	Garfield County supports the control of noxious weeds and invasive non-native plants. We encourage all federal agencies to identify and map areas of noxious weed infestations as soon as possible. We encourage increased efforts to eradicate noxious weeds and replace them with desirable native or non-native desirable plant communities.	
Popejoy	Mike	Grand Canyon Trust	Special status plant species	In addition, a number of rare plant observations have been made on the Wiggle Rim Pasture of the Cottonwood Allotment. Reduced or no livestock grazing on the Wiggle Rim Pasture could greatly benefit these documented rare plants: Tropic goldeneye (Heliomeris soliceps), Higgins' spring-parsley (Cymopterus acaulis var. higginsii), Kodachrome peppergrass (Lepidium montana var. stellae) and Paria spurge (Euphorbia nephradenia).	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Special status plant species	Monitoring data are needed for all the rare plants known from GSENM, including the 15 BLM Utah Sensitive species, those plants on the Utah Natural Heritage Program/ Utah Native Plant Society lists. In particular additional surveys are needed for the federally listed T&E species, Welsh's milkweed (Asclepias welshii) and Navajo sedge (Carex specuicola) that may be discovered within GSENM boundaries (J. Spence, personal communication, January 2021). Monument biologists need to determine if populations of rare and special status plants are stable, increasing, or declining, and if adequate recruitment is occurring to replace individuals as they die. Population viability data, derived from demographic monitoring, may be needed for species at high risk of extirpation. If Monument biologists are not able to do this monitoring, the BLM should partner with other agency or academic researchers for these field surveys.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Special status plant species	The AMS notes that 50 percent of the rare flora of Utah are found in the Monument. This reiterates how important it is to protect intact vegetation communities that still exist in the monument. The AMS includes 18 species that are federally listed or BLM sensitive plants that have been documented or have the potential to occur in the Monument. Beyond the 21 species noted in Proclamation 10286 or the AMS, we are aware of 17 additional rare plants that have been documented in the Monument (from SEINet herbarium records primarily and a few other sources) and a few other species that could be in the Monument (Appendix A, Table 1). These species occur throughout GSENM, but are often associated with unusual geologic substrata such as deep sand dunes, Moenkopi clay flats, Chinle badlands, Claron rims, Kaiparowits exposures, and springs or riparian habitats. 6 6 Fertig, W. F. (2005) Overview of the vegetation of Grand Staircase-Escalante National Monument. Moenave Botanical Consulting, Kanab, UT. 31 pp.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Special status plant species	Proclamation 10286 lists six rare or endemic plants , which are all described as "imperiled" or "critically imperiled" species or varieties by NatureServe (explorer.natureserve.org). Three of those species are listed in the AMS. It is not clear why the AMS does not list the other three. All the rare plants discussed in this section are in Table 1 of Appendix A.	Appendix A - Figures & Tables.pdf
Jackson	Thomas and Marilyn	Star Ranch LLC	Special status plant species	Special Status Species and Forecasts. This conclusion is highly questionable: "A range of threats, including habitat degradation from improper livestock grazing, trampling, unauthorized or cross-country off-highway vehicle (OHV) use, weed spread, and pinyon-juniper expansion, MAY affect individual species in different ways. " We suggest ADDING: Inappropriate Management by inexperienced people; bar-ditching of stream channels, lack of care of watersheds and water sources, lack of support for reservoirs and ponds, over-emphasis on deer and elk herds without comment for their overgrazing and competition with cattle grazing; lack of designated OHV areas and trails, lack of consideration of drought, flooding, and erosion control; lack of maintaining roads and trails to oversee problems, which also contribute to the failures of BLM to adequate manage the lands under their control. It is therefore, a valid conclusion that adding back additional acreage will not correct these named threats. We can accurately predict that adding the additional acreage back into GSENM management will cut access and private business presently enjoyed.	N/A



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Campbell	Todd	University of Tampa	Special status plant species	GSENM also supports 125 species of plant that are endemic to Utah or on the Colorado Plateau. This is due to the five life zones that are supported in the region, diverse soils as well as the substantial elevation gradient (the white house, 2021). The BLM has identified 18 species (threatened or endangered) that are either known to occur or have the potential to occur in the area. The main threat to these plants is vegetation community conversion which could be attributed to woodlands expanding into shrub/brush dominant communities. Other than vegetation community conversion, recreational use, improper livestock grazing and climate change (warming temperatures, drought etc) are also large threats to the common and rare plant species found in this area. There is little effort put towards documenting trends, habitat conditions and population size of these BLM sensitive species but predictions point to a decrease in evergreen trees and evergreen shrubs with an increase in grasslands.	N/A
King	Catherine	Utah Native Plant Society	Special status plant species	- Chinle badlands support Gumbo milkvetch (Astragalus ampullarius), Murdock's evening primrose (Oenothera murdockii), Chinle chia (Salvia columbariae var. argillacea), and Kanab thelypody (Thelypodiopsis ambigua). - Moenkopi clay flats support Kane breadroot (Pediomelum megalanthum var. epipsulum), Meager camissonia (Camissonia exilis) and Atwood's pretty phacelia (Phacelia pulchella var. sabulorum). - Navajo sand dunes support Escarpment milkvetch (Astragalus striatiflorus) and sandloving penstemon (Penstemon ammophilus). - Buckskin Mountain supports the only extensive outcrops of limestone on the monument. This represents the northernmost extension of the Grand Canyon Plateau's floristic element (i.e., plants with a similar distribution pattern) and is the northern range of several species that barely enter GSENM, including Chestnut milkvetch (Astragalus castaneiformis), Darrow's buckwheat (Eriogonum darrovii), and Jones false cloakfern (Argyrochosma jonesii). More populations will likely be discovered with additional surveys. - The higher elevations of GSENM (Skutumpah Terrace, White Cliffs, Canaan and Boulder Mountains) support MacDougal's aletes (Aletes maddougali), Zion draba (Draba asprella var. zionensis), Canaan daisy (Erigeron canaani), Zion daisy (Erigeron sionis), Panguitch buckwheat (Eriogonum panguicense), Paria breadroot (Pediomelum parienne), and Smooth penstemon (Penstemon laevis). - Many rare or endemic species are associated with the seeps, springs and hanging gardens that occur on some geological landforms in the monument.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Special status plant species	Ute ladies'-tresses (Spiranthes diluvialis), a Threatened species under the Endangered Species Act, occur in two of the above places: along Deer Creek from the Deer Creek Campground south to the narrows of Deer Creek Canyon, and along Henrieville Creek near the confluence of Shurtz Bush Creek. Proper protection of this Threatened species is an additional reason to allocate these areas as unavailable for grazing. Lick Wash contains an astonishing number of rare plants within its short 3.5 miles, including Paria breadroot (Pediomelum parienne), Lori's columbine (Aquilegia loriae), Zion fleabane (Erigeron sionis), Broadleaf gilia (Aliciella latifolia ssp. imperialis), Sand-loving penstemon (Penstemon ammophilus), Stella's evening-primrose (Oenothera cespitosa var. stellae), Canaan daisy (Erigeron canaani), and Kodachrome bladderpod (Physaria tumulosa), the last of which is listed as Threatened on the Endangered Species list. Proper protection of these species is an additional reason to allocate Lick Wash as unavailable for grazing.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Special status plant species	There are numerous rare or endemic plants in GSENM. We list over 40 rare plants in Appendix I that need to be monitored and protected. The diverse geomorphological regions and unique soil types of GSENM support various vegetation communities and endemic species in the monument (Fertig 2005). Some of the local endemics restricted to specific geologic formations are described below. (I) Fertig, V. F. (2005) Overview of the vegetation of Grand Staircase-Escalante National Monument. Moenave Botanical Consulting, Kanab, UT. 31 pp.	UNPS on GSENM 2022 (1).docx
Alderson	George and Frances	N/A	Paleontology and geology	Paleontological values: We compliment BLM on the attention given to paleontological values in GSENM, and we want to see that continue, with research and educational outreach to local communities as well as national and international levels.	N/A
Not Provided	Not Provided	N/A	Paleontology and geology	Touching on archaeological resources, BLM should identify a suite of sites stable enough for future visitation and stabilization. Threatened and sensitive sites should be protected to maintain the integrity of both. This is a perfect nexus for discussions with the tribes and collaborative discussions about solutions.	GSENM NOI Response.docx
Dissel	Scott	N/A	Paleontology and geology	Paleontological resources such as dinosaur, plant, insect or any other fossils should be protected by special designations whenever possible, with similar physical, signage, or legal enforcement as necessary.	Grand Staircase Escalante Management Plan comments 9.27.2022.pdf
J	A	N/A	Paleontology and geology	GEO/PALEO: I want to see explicit language in this plan addressing paleo resources - casual and commercial collection of paleo and geologic resources should be discouraged. Same goes for petrified wood. Just look at how many iron concretions (moki marbles) have been removed in certain areas of GSENM. Humans can not be trusted, so please provide extensive protections - any collection should require a permit and detailed documentation. Day use permits or other protection measures may be necessary at places like the Toadstools, Devil's Garden, Wahweap Hoodoos, and the Cockscomb.	GSENM_20220923.docx
Cox	Steven	N/A	Paleontology and geology	Hundreds of scientific and projects have been conducted on the monument with spectacular findings. More than 600 species of bees have been documented as well as a wealth of paleontological specimens unearthed. One of the world's best and most continuous records of late Cretaceous terrestrial life is found here. New discoveries are likely within the boundaries.	Comments on the Management Plan for the Grand Staircase Escalante National Monument.docx
Shelton	Carolyn	N/A	Paleontology and geology	Paleontological resources should be protected to the greatest extent, while allowing for research and excavation.	N/A
Smith	Latimer	N/A	Paleontology and geology	The paleontological resources contained within the monument are second to none the world over and have vastly expanded our knowledge of dinosaurs over the past few decades since the monument was first designated.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Paleontology and geology	Paleontological Resources and Geology: We would like to be involved in related scientific endeavors through consultation and possible partnerships with tribal members. The Navajo Nation has many geologic and paleontological analogues within its borders, so maintaining an awareness of this scholarship can help inform tribal members and support tribal management activities.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Paleontology and geology	We recommend that ALL species of dinosaurs, paleontology, archeology uncovered and deemed desirable to display, be kept in Garfield and Kane Counties at local museums and heritage sites.	N/A

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Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Paleontology and geology	Increased visitation is the single most significant threat to archaeological and paleontological resources. Since the designation of the GSENM, Garfield and Kane Counties have turned into magnets for "new-to-nature visitors." These visitors, usually through ignorance, mistreat archaeological and paleontological resources they encounter. Visitation has long been recognized as a primary driver of damage to archaeological sites.(49) All three Monument designations have caused a dramatic increase in the occurrence of corrosion, defacement, theft, vandalism, and desecration of archaeological and paleontological resources within the GSENM. Monument-generated visitors touch rock art panels, remove rock art panels with chisels and saws, collect pieces of ceramic vessels or stones, trample items, litter, defecate, and behave inappropriately. The frequency of these harms corresponds directly to the formal recognition conferred by the presidential proclamations. In 2015, GSENM reported 1,400 cases of vandalism. In that same year, the land now known as Bears Ears National Monument, a land far richer in archeological resources but undesignated as a monument, only experienced 5 cases of vandalism. Likely because it was unknown and not yet made a recognized attraction for visitors. (49) Larvris, A Perfect Pothunting Day (2007),	GSENM RMP Scoping Comments 27SEPT2022.pdf
Campbell	Todd	University of Tampa	Paleontology and geology	Major impacts and issues for the Paleontological zones within the GSENM are human impacts. These impacts include the disturbance of fossils through recreational vehicles, public ability to collect fossils, theft, and vandalism. The biggest of these impacts is the casual collection of fossils by the public. The issues created by humans are important because these areas are very fragile environments that contain important fossils to our earth's history. The GSENM houses some of the best found fossils in the world, many of the largest fully intact organisms found on earth were located here. In the GSENM the best shown differentiation in the layers of the paleontological time periods are located here showing some of the best preserved cretaceous environments. These environments provide scientific knowledge into the past worlds of dinosaurs and other organisms within these habitats which can give rise to investigations of the environments of earth's past as well as information into these organisms' physical attributes. There have been some soft tissues found within these sediments which can provide numerous scientific research findings into genetic and molecular levels of paleobiology (Senter, 2021). According to the National Parks Service they classify fossils as "non-renewable" meaning that once they are taken from their location they cannot be replaced and the information around them cannot be looked at (NPS, 2020). Finding fossils is a multi step process that requires many different tests and investigations such as the specific location, the rock it has been found in, the layer which it is located, different fossils near it, and the position of the fossil itself (NPS,2020). Each of these elements help tell paleontologists the information needed to understand more about these creatures. If the organisms are disturbed by human impacts, scientists can lose this valuable information when conducting research. National Parks Service, 2020; Significance Fossils and Paleontology. <a href="https://www.nps.gov/subjects/fossils/significance.htm">https://www.nps.gov/subjects/fossils/significance.htm</a> Philip J. Senter, 2021; Preservation of Soft Tissues in Dinosaur Fossils: Compatibility With an Age of Million of years. BioOne; The American Biology Teacher, 83(5):298-302 (2021). <a href="https://doi-org.esearch.ut.edu/10.1525/abt.2021.83.5.298">https://doi-org.esearch.ut.edu/10.1525/abt.2021.83.5.298</a> The preferred alternative for this specific area is alternative B. Within this alternative there is no use of OHV in open areas and they could only be used in specific designated areas. This designation would keep the paleo sites from being damaged by unauthorized vehicle access. Another factor is that all casual collection of fossils and minerals would be prohibited within the entire monument. With these regulations in place the paleo zones would be protected better from human impacts, which is the major impact on them.	N/A
Pollock	Leland	Garfield County Commission	Paleontology and geology	There are potentially thousands of paleontological resources within the County. Some are of greater value, and some are of lesser value. Those of lesser value need to be treated in accordance with law and in a manner that permits multiple use/sustained yields of lands located in the County. Those that are determined to meet a standard of significance need to be either protected in place or developed to provide for interpretive opportunities, use, and the enjoyment of current and future generations. Special land use designations should only occur in those situations where the paleontological resource is of such quality and value that it warrants special treatment. Recognizing that the monument has limited the use of the lands and ways that the County may receive revenue, we recognize paleontological resources as having some tourism value which may offset our reduced revenue. Because of this, we have a “no net loss of paleontological resource value” policy. We encourage the monument to retain these paleontological resources within the county and develop sites where the public and scientific community may come together to enjoy and learn from the resource. In situations where it is impossible to retain a paleontological resource in the County, an equal/adequate social, cultural, and/or economic compensation needs to be provided to the County. Such compensation may be in the form of educational opportunities, interpretive development, increased facilities, paleontological programs, and/or monetary contributions.	Garfield County Commission.pdf
Painter	Michael J.	Californians for Western Wilderness	Rangeland health and livestock grazing management	No new grazing permits should be issued, and those lands which are not being currently grazed should not be considered for permits, including areas retired previously. The benefits here are numerous, including preservation of biological crusts, prevention of pollution of streams and rivers and streambank erosion, preservation of springs, native vegetation restoration, and interference with wildlife.	N/A
Meisenbach	Dan	Canyonlands Conservation District	Rangeland health and livestock grazing management	The conservation district strongly encourages maintaining historical grazing pennits (AUMs) that are protected under the original monument designation of 1996. Livestock grazing is a vital resource management tool that is culturally and economically important to our district, county, and region. A rich livestock ranching heritage is a critical component and attribute to the original GSENM declaration and mission.	N/A
Meisenbach	Dan	Canyonlands Conservation District	Rangeland health and livestock grazing management	The district recommends active watershed improvements within the monument boundaries and maintaining grazing permits (AUMs) and projects that will benefit livestock and wildlife and improve water quality and quantity. The district also recommends that our local roads within Kane and Garfield counties stay open and maintained for public and land users within the monument.	N/A
Popejoy	Mike	Grand Canyon Trust	Rangeland health and livestock grazing management	30% utilization may allow grazing operations to occur during a drought without destroying important components of the landscape. The BLM should analyze a 30% utilization limit for upland herbaceous species (native grasses and forbs) to be applied to grazing across the Monument. A 30% utilization limit is a reasonable proposal, and thus should be included in the draft EIS. The BLM's Land Use Planning Handbook H-1601-1 provides that the land use plan needs to identify guidelines and criteria for future allotment adjustments in the amount of forage available for livestock, season of use, or other grazing management practices. The Land Management Plan should include a provision that any allotment over 30% utilization will trigger review of the allotment management plan, and that the Agency must review whether reduction in AUMs or other management actions are necessary to conform with rangeland health standards and to ensure grazing is consistent with the proper care and management of Monument objects.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Rangeland health and livestock grazing management	BLM last assessed capability over 40 years ago. <sup>54</sup> This earlier analysis based on sustained yield and forage production fails to consider wider ecological needs and the need to protect Monument objects. We are also aware of an effort to reassess capability as part of the Livestock Grazing EIS process initiated in 2013. However, even since that time conditions have changed. Temperatures have risen, precipitation patterns have changed, and drought has intensified. These trends are expected to continue into the future. Thus, an analysis done even 5-10 years ago is likely to not be appropriate for current conditions or for conditions extending a decade or two into the future. To be consistent with today's conditions and policies, and to be appropriate into the future, a new capability analysis is called for. 54 BLM. (2015). Grand Staircase-Escalante National Monument. Livestock Grazing Plan Amendment, Environmental Impact Statement. Analysis of the Management Situation.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Rangeland health and livestock grazing management	Issue 4: BLM Rangeland Health Assessment Practices fail to Identify All Impaired Monument Objects This Monument's Analysis of the Management Situation describes how BLM depends largely on the Agency's assessment of the condition of objects and values in the Monument using the monitoring and assessment practices for rangeland health standards. Many ecological and cultural objects in the Monument are impaired and few of these are noted in rangeland health assessment results. Described in detail later, the Monument's biological soil crust section is a good example that demonstrates problems found for a number of Monument objects. The remedy needed in the plan is for an independent objective scientific validation of Agency assessment methods and their practices to determine their adequacy in assessing the condition of Monument objects and values.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Rangeland health and livestock grazing management	Permit Renewal Since Congress amended section 402(c)(2) of the Federal Lands Policy and Management Act, all of the allotments in the Monument have been renewed without NEPA, many more than once. The FLPMA rider, as it is known, was intended to be a temporary reprieve to allow BLM to catch up on expiring permits. Using the FLPMA rider to renew permits indefinitely without rangeland health assessments or public involvement contravenes the intent of the legislation. We urge BLM to discontinue this practice and instead develop a schedule of permit renewals for which an analysis under NEPA will be completed.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Rangeland health and livestock grazing management	Range Infrastructure Voluntary relinquishments will inevitably raise a question about managing infrastructure on the relinquished lands, and we believe the RMP is a proper venue to provide direction on that question. To carry out Proclamation 10286, we believe BLM should establish planning direction that calls for removal of infrastructure on relinquished lands unless BLM determines that the infrastructure serves an active grazing operation (like a boundary fence between allotments) or that the infrastructure will protect or restore Monument objects, as Proclamation 10286 directs. Establishing this presumption in favor of removing infrastructure, especially dysfunctional infrastructure, would align not only with Proclamation 10286, but with BLM's regulations, which provide that "[r]ange improvements shall be installed, used, maintained, and/or modified on the public lands, or removed from these lands, in a manner consistent with multiple-use management." 43 C.F.R. § 4120.3-1(a). It is only logical that infrastructure that was built to serve grazing as a multiple use should be removed when that use of the public lands is discontinued, absent a valid reason for maintaining the infrastructure consistent with the law governing the lands in question, viz. Proclamation 10286. BLM's Handbook on Grazing Management, H-4120-1, likewise recognizes that "[r]ange improvements ... which are no longer helping to achieve land-use plans or allotment goals and objectives should be removed from the public lands." <sup>60</sup> This particular policy in favor of removing disused range improvements also comports with FLPMA and a widespread goal by BLM to rehabilitate surface disturbance after a particular use of the public lands (like oil-and-gas leasing or rights-of-way or mining) cease. Furthermore, we believe that removing obsolete infrastructure is likely to further the purposes of Proclamations 6920 and 10286 by benefiting Monument objects. For instance, removal of old fencing would benefit wildlife in the Monument. 60 BLM Grazing Management Handbook, H-4120-1 .36.B., p. 9 (1984).	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Rangeland health and livestock grazing management	We propose that range infrastructure be required to be maintained, and fences up and functional, before yearly turnout is permitted. In addition, we propose that any new fencing utilize the most up-to-date wildlife friendly specifications. As we observed above in the section concerning voluntary relinquishments of grazing permits, dysfunctional range infrastructure should not remain on Monument lands, for infrastructure that is dysfunctional cannot serve grazing operations as a use of the Monument (see 43 C.F.R. § 4120.3-1(a)), nor can it serve to protect or restore Monument objects. Removal of obsolete infrastructure is likely to benefit Monument objects. This is as true on lands for which grazing permits have not been relinquished as on lands covered by a permit relinquishment. As a result, we propose that the BLM establish a general directive in the Monument plan calling for removal of range infrastructure that is dysfunctional and not scheduled to be returned to use.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Rangeland health and livestock grazing management	In addition to determining which lands are available for grazing, BLM must determine which lands are capable of supporting grazing. Capability is mostly focused on the area being able to provide enough forage capable of supporting grazing of a specified number of AUMs within the ecological limits of the area. In order to determine capability, BLM must assess existing forage available (expressed in animal unit months) for specific allotments that can support grazing "while maintaining a thriving natural ecological balance." <sup>52</sup> 52 BLM Land Use Planning Handbook, H-1601-1 (2005); 43 C.F.R. §. 4130.3-1.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Rangeland health and livestock grazing management	Proclamation 10286 states: "The Secretary shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above and in Proclamation 6920." The NLCS focus on science directs the BLM to develop a grazing management program that protects natural and cultural resources. Cattle grazing is appropriate as long as it does not adversely affect the objects for which the Monument was designated. Grazing must be clearly and carefully evaluated, monitored, and annually adjusted in range operating plans. Monument livestock grazing and ecosystem range management must strive towards landscape health and sustainability first. 43 C.F.R. § § 4100.0-2, 4180.1.	Appendix B - RNA Proposals.pdf

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Popejoy	Mike	Grand Canyon Trust	Rangeland health and livestock grazing management	Proclamations 6920 and 10286 list many objects with the potential to be negatively impacted by grazing, including unusual and diverse soils that support communities of mosses, lichens, and cyanobacteria, Escalante Canyons seeps and springs, the Fiftymile Bench sagebrush steppe ecosystem, the upper Paria Canyon system and associated riparian vegetation and wildlife, pollinators (bees specifically), and cultural resources. The BLM should undertake a systematic review of the consistency of authorized grazing with the proper protection of Monument objects. Proclamation 10286 provides that "the Secretary shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above and in Proclamation 6920." Proclamation 10286 contains many new objects that were not included in previous proclamations. Further, the language directing grazing be managed consistent with the care and management of objects is new. It was not contained in either Proclamation 692061 or Proclamation 968262, and requires the Agency to conduct an assessment of grazing compatibility with the proper care and management of Monument objects. The Agency has not previously assessed whether individual grazing permits are consistent with the proper care and management of the objects identified in both Proclamation 6920 and Proclamation 10286. Since 1996, BLM has renewed all the grazing permits multiple times without environmental analysis and at a permitted number of AUMS significantly higher than actually can be grazed. <sup>63</sup> Even at lower numbers of AUMs, many of the Monument allotments have one or more sites that have objects and values that are impaired. In many places, current grazing management is inconsistent with protection of Monument objects, which should take precedence over grazing as a discretionary use. 61 Proclamation 6920, "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." 62 Proclamation 9682, "Nothing in this proclamation shall be deemed to affect authorizations for livestock grazing, or administration thereof, on Federal lands within the monument. Livestock grazing within the monument shall continue to be governed by laws and regulations other than this proclamation." 63 Wild Utah Project, Western Watersheds Project, Southern Utah Wilderness Alliance, Yellowstone to Uintas Connection, Sierra Club, Grand Canyon Wildlands Council, Wild Earth Guardians and Center for Biological Diversity. (2008). These comments present a critique of, and recommendations for, the Bureau of Land Management's Draft Environmental Impact Statement for grazing management in Grand Staircase-Escalante National Monument.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Rangeland health and livestock grazing management	The 2000 MMP states: "No allotments will be converted from cows and horses to domestic sheep within at least a 9 mile buffer of bighorn sheep habitat, except where topographic features or other barriers prevent physical contact. This is in order to prevent the spread of disease from domestic sheep to desert bighorn sheep" (p. 42). We believe that this guidance is consistent with Proclamation 10286 and remains relevant to the management of the Monument and also follows BLM Manual MS 1730 Rel. No. 1-1771 - Management of Domestic Sheep and Goats to Sustain Wild Sheep which provides the BLM's policy to achieve effective separation of BLM authorized domestic sheep or goats from wild sheep on BLM lands. We propose that this guidance be considered for inclusion in the new RMP.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Rangeland health and livestock grazing management	The Hall Ranch, Last Chance, Mollies Nipple, Rock Creek-Mudholes, School Section, and South Fork Allotments all have a year-round season of use (AMS Table 5-13, pp. 5-27 to 5-30). It is unclear whether all of these allotments include a pasture rotation system such that any particular pasture is not grazed year-round. We request clarification on this point. Year-round grazing of the same pasture (or of an entire allotment) is likely to result in significant degradation, particularly in the dryland ecosystems of the Monument, and has the potential to degrade Monument objects. If any pastures are grazed year-round, a consistency analysis should be undertaken to determine whether the authorized grazing is compatible and consistent with the proper care and management of Monument objects.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Rangeland health and livestock grazing management	There are at least two additional questions about voluntary retirements that it would be helpful for BLM to address in the RMP. One is about how to handle voluntary relinquishments on allotments that are run in common by multiple permittees or, similarly, on allotments that are only partially within the Monument boundaries. The other is about how to manage range infrastructure following a voluntary relinquishment.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Rangeland health and livestock grazing management	We propose that the BLM should utilize Annual Operating Instructions for grazing management. This would provide both for documentation of yearly plans for an allotment and increased public transparency regarding management of the Monument, which would hopefully result in improved conditions on the ground.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Rangeland health and livestock grazing management	When relinquishments are made on common or partial allotments, the task facing BLM will be to effectuate the directive in Proclamation 10286 to "retire from livestock grazing the lands covered by such permits...." We submit that the approach that best comports with that instruction would be to retire from grazing entire pastures or other discrete areas of an allotment whenever possible. We believe that this would be the most beneficial approach for the proper protection of Monument objects, such as biological soil crusts or sensitive plants. We recognize, however, that permit relinquishments on allotments grazed in common may implicate the interests of permittees on the allotment who have not chosen to relinquish their grazing privileges. Under Proclamation 10286, grazing retirements are intended to be voluntary, and as such, we believe it is important to establish direction to ensure that relinquishments are accomplished in a way that guards against involuntary impairment of another permittee's authorized operations. To that end, we encourage BLM to establish directives along the following lines: Common Allotments - If all permittees on an allotment grazed in common consent, a voluntary relinquishment may be effectuated by retiring from grazing agreed-upon pastures or lands supplying forage in an amount that is commensurate to the preference relinquished. The intent of this option would be to allow permittees to voluntarily reach agreement on how to accomplish a relinquishment in a manner that is most effective for their operations. - If all permittees on an allotment grazed in common have not otherwise reached agreement, when a grazing preference is relinquished by a permittee whose use of one or more pastures is exclusive, the pastures corresponding to the relinquished preference should be retired from grazing, provided that existing or new range infrastructure allows for the pastures' closure without impairing other permittees' operations. - If all permittees on an allotment grazed in common have not otherwise reached agreement, when a grazing preference is relinquished by a permittee whose use of one or more pastures is not exclusive, the relinquishment should result in a reduction of the active and permitted number of AUMs on the allotment as a whole in an amount equivalent to the preference relinquished. Partial Allotments - When a grazing preference is relinquished by a permittee on an allotment that is only partially within the Monument, the Monument lands corresponding to the relinquished preference should be retired from grazing if existing or new range infrastructure allows for the closure without impairing any other permittees' operations. - In all other circumstances on allotments that are only partially within the Monument, relinquishment of a preference by one permittee should result in a reduction of the active and permitted number of AUMs on the allotment as a whole in an amount equivalent to the preference relinquished. Under all of these scenarios for common and partial allotments, forage should not be reallocated on the allotment in a manner that impairs the relinquishment absent a finding by BLM under Proclamation 10286 "that such reallocation will advance the purposes of this proclamation and Proclamation 6920."	Appendix A - Figures & Tables.pdf
Poe	Noel	High Desert Backcountry Horsemen	Rangeland health and livestock grazing management	Another controversial issue that needs to be addressed in the RMP is the use of corrals and water developments if the permittees are not using them. Equestrians don't stay overnight unless their trailer is carrying water for the horses. Corrals are convenient and safer for horses, if properly constructed. Are 2-float shut-downs available for storage tanks to (1) limit the amount for horses, (2) limit the amount for cattle use, but continue to allow water service for native wildlife? We believe that the BLM assists the permittee by providing Federal funds for livestock facilities, water developments and often times even labor from the BLM staff. The money may come from the fund that the District or Field Office has available from the pennittee's payment of Animal Unit Months (AUMs) or other sources. If there is government money going directly into corrals or water development, then equestrians visiting the National Monument should be able to put their horse(s) in that corral if facilities are empty.	N/A
Shu	Lyn	Highway 84 LLC	Rangeland health and livestock grazing management	Documentation shows there is an additional 35,500 acres within the Decision Area, available for livestock grazing, but are not being grazed. Grazing is completely compatible with Monument values. With the added acreage, cattlemen should be given the opportunity to utilize this acreage and provide great range-fed beef to America. We have welcomed seeing cow trails as they have led us back to reality! With the data collected, GSENM should put a cap on the number of competitive animals the Division of Wildlife Resources and Fish and Game are allowed to graze in each of the allotments. Likewise, DWR should budget and plan for predatory control.	N/A
Shu	Lyn	Highway 84 LLC	Rangeland health and livestock grazing management	Reading Table 5-14 shows an overwhelming goal to remove cattlemen from GSENM. This was the primary reason the area was settled and should be supported and strengthened with opening new areas to grazing to keep a good supply of range-fed, organic beef an America's markets. The goal at Collet is 'increased use supervision to control unauthorized livestock;' we would recommend increasing predator control and competitive species of bears, antelope, deer, big horn sheep, etc.	N/A
Cutler	Clayton	Kane County Utah	Rangeland health and livestock grazing management	Additionally, Kane County asserts that citizens who hold grazing permits on the Grand Staircase-Escalante National Monument have an inchoate, contingent right that federal courts have recognized. Because of the important role livestock grazing is to Kane County's economy, even more policy has been adopted by the County addressing the decision to reduce or eliminate grazing: "Grazing allotments on the Monument should not be closed or converted to grassbanks when they are voluntarily released by permittees for whatever reason. Any allotment that becomes vacant should be offered to other permittees unless there are compelling and documented reasons for leaving the allotment vacant. Whoever obtains a grazing permit should be required to run a reasonable number of livestock on it, unless there are reasonable and documented resource concerns or personal issues that require a temporary reduction."12 12 Kane County Resource Management Plan p. 99.	Scoping Letter GSENM -signed.pdf
Todd	Robin	Maryland Ornithological Society	Rangeland health and livestock grazing management	Livestock Grazing: Riparian vegetation in the canyons provides essential habitat for both resident and migrant birds. Grazing by domestic livestock impairs that value of the monument. Grazing in riparian areas has been studied by range scientists and wildlife biologists over many years. Their findings tell us that livestock congregate along watercourses to seek forage, water and shade, resulting in intense grazing and trampling and the destruction of riparian vegetation. The plan should provide for reductions in grazing to bring back native ecosystems and also provide for removing feral or escaped cattle from the canyons. BLM should honor all previous retirements of grazing permits. No new grazing should be contemplated.	MOSltrr_GrandStaircaseScopingSep2022.pdf
Allison	Robert	N/A	Rangeland health and livestock grazing management	GSENM is characterized by tensions between grazing stakeholders and conservation stakeholders who argue that a reduction in grazing is necessary to reduce environmental impact and maximize the maintenance of natural processes in the monument. The tensions created by increased recreational use is of concern to both grazing and conservation stakeholders.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Sorenson	Craig	N/A	Rangeland health and livestock grazing management	<p>- Having been a career BLM employee for 31 years with a resource education and background spanning Wyoming and Utah, I can't help but recognize the potential of the land and the need for improved management on sensitive lands, streams and springs. The best available science shows that the land is healthier and grazing economics stronger when cattle eat no more than 30 percent of available key species. There are many areas where this is being exceeded every season. Compiled with drought conditions the result is poor range conditions, starved livestock and a sick land. I can list several areas where improvements are needed: The Gulch has the potential to look like Steep Creek or Calf Creek and although BLM range staff claim it meets minimal riparian standard it is a sham. The benches should be restored at least to a condition of those that have been reclaimed along the Escalante River. That is what they could and should look like. Calf Creek is another example of that happened with overgrazing and got its name from weaned calves being corralled there prior to the 1960's until there was no viable vegetation and it was denuded like the Gulch is today. Lower Calf Creek was closed to grazing when the Campground was built. It is in a climax condition today with all the glory nature can muster. It is a wildlife haven and meets the full potential of the land. Canyon bottoms are home to sensitive plants. Livestock grazing on any riparian areas and sensitive lands should be the highest priority for land health.</p>	GSENM Management Plan Comments.pdf
Sorenson	Craig	N/A	Rangeland health and livestock grazing management	<p>- Voluntary grazing retirements on the Escalante River and other sensitive lands that were retired from grazing should remain closed to cattle grazing. Taking cattle off the Escalante River and these bench areas resolved several serious problems: 1.It was dangerous for the permittee to manage and herd livestock along an icy river corridor. Monitoring put BLM staff at risk as well. 2.The permittee was continually getting complaints from recreation users about the cattle and conflicts when people were having confrontations while cornering cattle in narrow canyons. The visitor registers were full of visitor complaints especially where the livestock would congregate at the trailheads. 3.Cattle were being hit by cars at the Highway 12 bridge and along Highway 12 on Phipps Pasture especially at dusk and night. I witnessed one of these incidents in 1997 about the time the permittee decided he had had enough and approached Grand Canyon Trust to buy his permit. A cow was hit by a truck and killed on the bridge and the starved calf later fell off a cliff to its demise. It was costly to the permittee besides being a serious traffic hazard. 4.Livestock caused numerous social trails and denuded the benches to nothing but tumble weeds and cheat grass. It was impressive how these impacts are remedied after livestock grazing being removed. 5.The water quality was seriously fouled by the cattle especially in all of the side canyons and the Escalante River above Death Hollow where water was scarce and the cattle wallowed and trampled in what water sources were available. On several occasions the only option available for backpackers and the Boulder Outdoor Survival School was to try and filter the green cow shit water. 6.All of the accessible alcoves, overhangs and many were archeological sites had been impacted and continued to be bedding grounds for cattle and earlier sheep flocks. The feces petrified and piled up in these beautiful features in perpetuity until volunteers were able to clean them out and return the sandy bottoms to pristine. 7.Providing water for livestock on these dry benches is not feasible if not impossible. 8.The months of May and June on the Escalante River from the town of Escalante to the Glen Canyon National Recreation Area were essentially off limits to hikers because of the 'cow' flies. The biting flies went away after the cattle were removed. 9.It is critical to honor grazing relinquishments. It is the best insurance a permittee has to recoup their investments especially when climate change and other economic hardships threaten their very existence.</p>	GSENM Management Plan Comments.pdf
Allison	Robert	N/A	Rangeland health and livestock grazing management	<p>1.A dialogue process to reduce and transform conflict between grazing and conservation on GSENM. This could also include and involve aspects of conflict over restoration. 2.Exploration of novel approaches to create incentives for ranchers to contribute to land restoration and conservation, drawing on examples from elsewhere in the world.</p>	N/A
Pollack	Lonnie	N/A	Rangeland health and livestock grazing management	<p>3.Traditional uses that support local communities need to remain. The economy of the local communities depend on these uses. 4.Protection and multiple use can co-exist. Along with protection, land conservation practices need to be implemented. 5.It is my desire as a life long resident and public lands rancher that these traditions continue. I believe with a common sense approach to the RMP this can be accomplished the satisfaction of all parties.</p>	N/A
Not Provided	Not Provided	N/A	Rangeland health and livestock grazing management	<p>Anglo/European settler heritage should be protected as well, which includes traditional land and resource uses in the area that local residents have long valued including grazing, wood gathering, and road access including minor roads and trails. Grazing on monument lands can be managed within scientific and professional decision making norms. This is a deep rooted part of the local heritage and has its place on these wild lands, and is also an important economic piece to residents of the counties and communities within monument and Glen Canyon boundaries. Local interests need to be protected and prioritized above those of outside influences. There should be a duty in drafting this plan to not damage local economies, businesses, and traditional ways of life for local residents, and to in fact benefit all aspects of local communities and economies.</p>	N/A
Jorgensen	Helene	N/A	Rangeland health and livestock grazing management	<p>Cattle grazing Many areas of the grand staircase is currently grossly over-grazed by cattle. The density of grazing is unsustainable and is causing widespread destruction of the habitat. Cattle destroy native plants, turn large areas into sandy desert with little vegetation growth, and erode stream beds. Cattle grazing should be the ended in most areas in the GSENM.</p>	N/A
Carlin	Charles	N/A	Rangeland health and livestock grazing management	<p>Cattle grazing is largely incompatible with management of the Monument as a living scientific laboratory and as a place of solace for low impact visitors. Cattle have an outsized impact on native plant communities, harm water quality, and negatively impact the backcountry user experience.</p>	Carlin_Grand staircase comments.pdf
Alderson	George and Frances	N/A	Rangeland health and livestock grazing management	<p>Cattle management: We urge BLM to provide for reducing the impacts of cattle in GSENM. Livestock should be strictly barred from the Escalante Canyons, and any remaining feral cattle should be removed. Throughout the monument the plan should provide for re-evaluating any existing grazing permits and either eliminating the grazing use or reducing the stocking rates or seasons of use. Where sensitive areas were voluntarily retired from grazing, those areas should again be closed to cattle. We favor limiting grazing to the removal of no more than 30 percent of vegetation</p>	N/A
Lish	Christopher	N/A	Rangeland health and livestock grazing management	<p>Cattle must be excluded from canyon bottoms where they inevitably trample sensitive plants and foul streams and creeks. Please only permit cows to eat 30 percent of vegetation, maximum. The best available science shows that the land is healthier and grazing economics stronger when cattle eat only 30 percent of plants. And please honor previous grazing retirements. Sensitive lands that were voluntarily retired from grazing should again be closed to cows.</p>	220926_doi-blm-ut-p010-2022-0006-rmp-eis_grand_staircase-escalante.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Murray	Danielle	N/A	Rangeland health and livestock grazing management	d) Grazing- The proclamation states that livestock grazing be managed "consistent with the care and management" of monument objects. As with recreation, grazing is a discretionary use and cattle grazing is appropriate as long as it does not impact the objects and values for which the monument was designated. In general, we recommend previously relinquished allotments remain unavailable and not to allow grazing in areas that impact monument objects and values. We would like to highlight the specific recommendations outlined in the group comments led by Grand Canyon Trust and Grand Staircase Escalante Partners.	Scoping Comments GSENM- Conservation Lands Foundation.pdf
Plummer	Richard	N/A	Rangeland health and livestock grazing management	Existing grazing rights being preserved (as per the proclamations), nonetheless the BLM should prohibit mechanical treatments, and should NOT use non-native species for restorations and post-fire treatments.	N/A
Veranth	John	N/A	Rangeland health and livestock grazing management	Fiftymile Mountain is a archaeology-rich plateau, and if one hikes to the south end offers an incongruous view into Arizona (less shocking now that the Page power plant is closed). Water supply is a major constraint on backpacking here. The recent drought has dried up many of the springs and cattle trampling has made other water sources unusable. A specific management recommendation would be to fence major springs and restore the pipes to troughs.	Veranth Scoping 926.pdf
Ormond	Annette	N/A	Rangeland health and livestock grazing management	I believe the ranchers are good stewards of the public lands because their livelihood depends on it. This community is a small rural community that depends on ranching and farming, and they depend on the public lands use. The cows keep the underbrush and grasses cleaned up, which reduces the risk of wildfires in our deserts and our mountains and reduces the need for controlled burns. The BLM and Forest Service would have to hire a lot of people to keep the lands clean and safe from wildfires and the resources would just be wasted. It seems that controlled burns are the most popular way of maintaining the undergrowth and some of those end up out of control. These controlled burns have a huge negative effect on our air quality and they cost a lot to facilitate and maintain each year. We have to breathe the smoke, which is unhealthy for us, and a lot of trees and habitats get burned up, which is devastating to wildlife and wasteful of the resources. I totally support our ranchers and maintaining the grazing permits. Retiring the grazing permits would be devastating to our ranchers and our community. It will be a similar devastation as the sawmill closing was. It will also make the community more dependent on tourism, which isn't all good.	Letter to GSENM 2022.pdf
Trimble	Stephen	N/A	Rangeland health and livestock grazing management	I'm particularly concerned about favoring grazing over conservation. I know the Biden proclamation allows grazing permits to continue, but these permits should be much more closely monitored. As an example, I frequently hike in Deer Creek, walking downstream from the Deer Creek Campground on the Burr Trail. Cows trample and denude the riparian areas along the creek, and the benches are churned into sterile piles of sand by the cows. All this in an area dense with cultural remains-remarkably abundant lithics and debitage. Whatever biological soil crust once stabilized these soils is long gone. Deer Creek is clearly an area where grazing has not been managed well and restoration is desperately needed. As we have on the Escalante River, we need to remove cows from Monument riparian areas. The BLM should permanently retire all currently un-grazed and restored areas within the Monument from future livestock use. Whenever a permit isn't renewed, that permit should be retired. Grazing has consistently negative impacts on monument values and contributes little to the local economy. In Garfield and Kane counties-which contain all of the Monument-farming and ranching account for just 5 percent of jobs and less than 1 percent of annual income for the less than 8,000 people who live in these 9,000 square miles.	GSE RMP comments 9-2022.pdf
Sjogren	Morgan	N/A	Rangeland health and livestock grazing management	In several allotment areas where grazing rights were relinquished, the relinquishments were reversed in 2020, but no reason was given by the BLM. The BLM needs to explain this. Canyon bottoms and water sources are also a monument object, and the following grazing allotment areas. I have witnessed grazing impacts firsthand in canyon bottoms and waterways, and I have hiked in the following canyons where I do not think grazing is appropriate to protect them as monument objects: The lower Gulch to the Escalante River, The Gulch from the Burr Trail north to access from the Circle Cliffs, Deer Creek from the Burr Trail south to the Escalante River, Boulder Creek from the monument boundary south to the Escalante River, Hackberry Canyon/Cottonwood Creek/Round Valley Draw narrows, Paria River and its tributaries canyons), Kitchen Canyon and Starlight Canyon from its head to Kitchen Canyon, Willis Creek and Sheep Creek, Bull Valley Gorge, Lick Wash, Buckskin Gulch from Hwy 89 to House Rock Valley Road. I am aware that the decisions made about grazing in GSENM also impact the planning/management in Glen Canyon NRA. Particular attention must be given to wetland and riparian areas, sensitive species and their habitats, water quality, and cultural resources." In 2020 I witnessed cows in 40-mile gulch in both the GSENM and Glen Canyon NRA portions. The cows were polluting the riparian waterways, and springs which were filled with cow pies and hoof prints. (Photos attached.) The spring at the first waterfall was particularly infiltrated by impacts and cows. The riparian plants were also being overgrazed. In 2018 I encountered a dead cow in the same canyon, within the narrow slot where no cows should be. (Photo attached.) The ranchers need to recover dead cows at a much quicker rate so that they do not pollute riparian areas and waterways. There were also cow pies and hoof prints in and around a cultural rock art site in 40-mile gulch. Glen Canyon NRA is not suitable for grazing, and it should not be permitted within the NRA lands adjacent to GSENM. In the meantime, I urge the BLM to enforce better management of livestock in the Forty Mile Ridge allotment.	40 Mile Gulch _ 2 May 2020.pdf
Beltran	Erin	N/A	Rangeland health and livestock grazing management	Just as important to me as travel management is cattle grazing. Just... why?! The agency isn't profiting substantially from this, and the activity provides almost zero employment locally... and of course it is horrendous for the land! Wildlife need the limited forage and water out there for themselves! Get people's slaughter beasts out of there! No recreator goes to public lands hoping to bump into herds of smelly domesticated livestock! We all go hoping to see eagles, antelope, and more. Maybe you could profit off hunting licenses some day if you gave the wildlife a chance.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Holland	Marsha	N/A	Rangeland health and livestock grazing management	Lastly, my concern focuses on continuing regional drought (grateful for 2022 Monsoon season!), the range managers must continue to make the tough decisions to protect and conserve what is left of the resources leased to permittees and their livestock. And retire allotments as possible. An exit plan should be developed and implemented as needed over the coming years. Respect the past and plan for future generations of all species. Until then: Conducting and completing NEPA analysis on grazing allotments should be an important first step- since the lands used for livestock grazing on Grand Staircase have not been subject to NEPA review, ever(?) NEPA has not been done, this is a missing component on the Monument and should be included in any future AMS. From the Analysis of the Management Situation (AMS): - How will the BLM manage retirement of grazing permits and leases, as provided for under Proclamation 10286? Please outline and make available to the public including allotment holders how allotments may be retired. It has occurred previously, there are guidelines. - Should supplementary adaptive management tools for rangeland health and grazing management be adopted under drought conditions? GSENM as an agricultural landscape: It is a tough place to conduct ag business, to be in "grazing" because the land is not suited to it, especially in the current weather conditions. A hundred years ago ranchers knew it, dealing with fickle weather, limited poor soil and a rugged landscape. What supplementary and adaptive management tools are being proposed and who will review their viability in drought conditions or any conditions? What are the limits on this action? Will it be more non-native species and (oops!) alfalfa seedings? Is it a waste of taxpayer money since there is no longer reliable moisture to grow seedings? Mastication of Indigenous sacred lands and plant species and manipulation of (also sacred) springs and rare riparian areas for the purpose of rangeland enhancement, for it is clearly not for wildlife habitat restoration, must be addressed and preferably abated. Is the success(es) of the previous mastication and seeding programs to date available to public? Although I can see the success or lack thereof on the Skutumpah Plateau area, nothing happened. - How will the BLM address climate change and seasonal drought effects on long-term vegetation community changes and forage? Livestock forage should not be the priority. These questions therefore should be addressed in the management plan. Native plant and animal communities should have priority. Their survival and adaptation links to human survival and adaptation Now is the time to Conserve and Protect what remains on this remarkable and outstanding landscape for future generations.	Comments for Scoping 2022.pdf
Jorgensen	Helene	N/A	Rangeland health and livestock grazing management	Little research has been conducted on the long-term effects of grazing in a high-desert habitat like the GSENM. However, the damaging effects are apparent to anyone visiting BLM lands in Southern Utah. The BLM should conduct detailed research on effects of cattle grazing and how the land recovers after cattle grazing is ended.	N/A
Spotts	Richard	N/A	Rangeland health and livestock grazing management	New range improvements should be prohibited because they simply spread grazing impacts to new areas without necessarily benefitting already degraded areas. Most BLM range specialists are hopelessly biased and too friendly with their rancher permittees. Their rangeland health assessments are often not objective or accurate. Their job is to administer grazing permits so they have an improper incentive to favor grazing and ranchers regardless of the deleterious effects on rangeland health. Their EPAPs need to be revised to link their annual job performance with the actual rangeland health trend of the allotments and permits that they administer. While they cannot control climate change and drought, they can and should suspend or reduce grazing pressure to stop or prevent any resource degradation.	N/A
Orr	Nancy	N/A	Rangeland health and livestock grazing management	Start the process of removing cattle grazing allotments from Monument boundaries. Cattle have been severely damaging riparian areas within the Monument boundaries for decades; I have seen firsthand the damage in the Coyote Gulch area, the Escalante River canyon and many of its side canyons since the 80's, and do not doubt that it existed long before. Native wildlife species have enough challenges without having to compete with cattle.	N/A
"Crockett' Dumans	Millard	N/A	Rangeland health and livestock grazing management	The cumulative impact on range vegetation loss and soil loss, along with the 140 yr old Head Cuts that are still active and eroding (such as the original Hole in the Rock Wagon Route), livestock trailing and use activities.	N/A
Eaton	Marietta	N/A	Rangeland health and livestock grazing management	What is the current ecological status of allotments and what rangeland parameters are currently in place to assess allotment health?	GSENM NOI Response.docx
Spotts	Richard	N/A	Rangeland health and livestock grazing management	While BLM cannot control climate change and erratic weather patterns or extended drought, it can compensate for or mitigate these impacts by eliminating or greatly reducing the human caused impacts that it can control. The best defense is to keep ecological systems as healthy and resilient as possible and to provide native species with the ability to move across the landscape as needed to survive. The best way to do this is to eliminate or greatly reduce the most ubiquitous and cumulatively harmful human use on the GSENM - livestock grazing. Among other things, this grazing erodes soils, kills crucial biological soil crusts, helps cheatgrass and other invasive plants expand (thereby increasing fire danger), degrades water quality, removes water that would otherwise be available for wildlife, destroys riparian habitats, and outcompetes native wildlife for limited forage. Ranchers also promote vegetation treatments to increase forage for their cattle but these treatments jeopardize monument objects and values. As such, the RMP DEIS should include and fully analyze one or more alternatives to make existing grazing allotments unavailable for future grazing and to retire those allotments. Voluntary permit buyouts may be part of the implementation, but this should not be a condition before allotments are retired. The two grazing related attachments provide some relevant information. Please review them and include them in this RMP planning file.	Climate Change and Livestock Use on Public Lands 2022.pdf
Kloetzel	Steven	N/A	Rangeland health and livestock grazing management	Allowing commercial grazing to proceed in thei national monument will only further degrade the monument and its valuable resources. All other uses on these important lands will be themselves degraded, and suffer, due to this one incompatible use.	GSENM RMP.EIS Comment Card_20220729_sk.pdf
Dissel	Scott	N/A	Rangeland health and livestock grazing management	Biological soil crusts (cryptogamic soils) and other erosive areas (virtually the entire Monument as it is literally made of sand) must be protected from the damage caused by cattle, off-road or off-trail ORV, ATV, motorcycle and UTV use. All motorized vehicles must be kept to existing, designated roads and trails only, and even then, minimized to the greatest extent possible. There are many "ways" that are simply undesignated tracks kept open by use that should be closed permanently to vehicles, regardless of any entity's assertion that they are "maintained routes". Physical barriers, signage, legal penalties (fines, impoundments) should be used to the greatest extent possible to enforce this management.	Grand Staircase Escalante Management Plan comments 9.27.2022.pdf
Isaly	Ellen	N/A	Rangeland health and livestock grazing management	Decisions BLM makes in this plan regarding grazing inside Glen Canyon must adhere to grazing management agreements with the National Park Service and ensure no resulting impairment to legally mandated park protection values.	N/A
Escalante resident	Not Provided	N/A	Rangeland health and livestock grazing management	Given the emphasis on science in GSENM, the BLM should use the best available range science to manage livestock grazing on GSENM. Better management could benefit permittees although they may initially be opposed to changes in their longstanding management practices and could also decrease the visual impacts and negative perceptions of livestock grazing on GSENM.	N/A



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Gorzalski	Christina	N/A	Rangeland health and livestock grazing management	Grazing-After a very long process, the Escalante River is now returning to a more natural floodplain habitat with Cottonwood trees regrowing. I would like to see the previous retirement of the grazing permit continue without corridors for cattle use. Cattle do not go far from water sources in the desert and the water quality downstream will be adversely effected by waste.	N/A
Spotts	Richard	N/A	Rangeland health and livestock grazing management	I believe that the most widespread human use on the GSENM is commercial livestock grazing. I also believe that BLM managers have failed to protect many GSENM objects and resources from the adverse impacts of this ongoing grazing. It is therefore crucial that this new GSENM RMP planning process honestly and courageously deal with these harmful grazing impacts and the need for much more effective object and resource protection. For example, this planning should identify and propose for permanent retirement those GSENM grazing allotments where objects and resources have been destroyed or degraded or where there is a reasonable risk of that occurring in the foreseeable future. Voluntary grazing permit buyouts should be encouraged for those allotments. But the allotments should be retired under the new RMP regardless of whether permit buyouts occur.	N/A
Sjogren	Morgan	N/A	Rangeland health and livestock grazing management	Proclamation 10286 lists the following as objects that can be negatively impacted by grazing: the Fifty-mile Bench sagebrush steppe ecosystem, the upper Paria Canyon system and associated riparian vegetation and wildlife, and cultural resources. I have hiked in portions of all of these areas and the effects of cattle grazing, including cow pies, polluted water sources, erosion and overgrazed vegetation. Renewed grazing permits should only be offered once allotment areas have been assessed to see whether they comply with Proclamation 10286. Public comments should be a part of this process. Tribes should also be consulted about grazing management in these areas. Pollinators like bees are also monument objects impacted by grazing. With bee populations under threat, it is so important to protect these populations in GSENM.	40 Mile Gulch May 2020.pdf
Dissel	Scott	N/A	Rangeland health and livestock grazing management	Streamsides, "riparian areas," springs, potholes, drainages, and other waterways and resources, including the entire length of the Escalante River, must be protected from cattle grazing. Cattle should not be allowed into the mainstem of the River, nor any of the side canyons that drain immediately into the River. All other areas of the Monument should be assessed and placed off limits to cattle as necessary. Grazing should be limited to the greatest extent possible, or eliminated altogether.	Grand Staircase Escalante Management Plan comments 9.27.2022.pdf
Escalante resident	Not Provided	N/A	Rangeland health and livestock grazing management	The BLM should consider how to manage the feral cattle in the Escalante River canyon and how to keep cattle on adjacent allotments from getting into the canyon. Garfield County's plan to hire someone to capture the cattle is reminiscent of the fiasco with feral cattle on Fiftymile Mountain. The cattle are dangerous, extremely difficult or impossible to catch, hold, drive, and there are few points where they could be driven out of the canyon if they are captured. The most sensible solution is to shoot them.	N/A
Kloetzel	Steven	N/A	Rangeland health and livestock grazing management	We were struck by the very apparent damage caused by the cattle grazing in fragile desert and near desert environments as found in Southern Utah. It is impossible for me to believe that BLM resource managers are taking a hard look at the long term impacts to native plant systems, water quality, and fragile archaeological sites at GSENM. I see no solution going forward, especially given the looming impacts of climate change, but for livestock grazing on GSENM to be terminated. I am certain there is ample evidence, if thoroughly and factually investigated, for the summary termination of leases (permits) die to negative environmental and archaeological impacts of public resources.	GSENM RMP.EIS Comment Card_20220729_sk.pdf
Sjogren	Morgan	N/A	Rangeland health and livestock grazing management	While the monument honors existing grazing permits, the proclamation states that grazing is appropriate as long as it does not adversely affect the objects for which the monument was designated, and therefore must aim towards landscape health and sustainability first. President Biden's proclamation specifies that livestock grazing be managed "consistent with the care and management" of monument objects. This is different from Proclamation 6920. I witness grazing impacts frequently within GSENM, including those that impact monument objects like endemic plans, biocrusts, water sources, specific land areas, and cultural sites. Areas where livestock grazing management cannot be adjusted to protect monument objects should be unavailable to livestock grazing. Period. It must be determined through an assessment how grazing impacts the environment, monument objects, and cultural objects. It is a FLPMA requirement that the BLM determine whether the benefits of grazing outweigh the costs. If grazing impacts the natural ecosystem, then it is disturbing the monument objects in need of protection by the monument proclamation and therefore is not suitable for that given area. The BLM must also determine if the lands are suitable to cattle grazing. The last time this happened was forty years ago according to the 2015 Grand Staircase-Escalante National Monument. Livestock Grazing Plan Amendment, Environmental Impact Statement. Livestock must be managed to protect culturally significant resources to Tribes like (archaeological resources, springs, and plants) which are present throughout the monument, not just in localized areas. Cultural sites need to be continually monitored for grazing impacts with input from the Tribes.	40 Mile Gulch May 2020.pdf
Not Provided	Not Provided	N/A	Rangeland health and livestock grazing management	Although considered controversial an extensive effort to conduct "Rangeland Health Assessments" on upland and riparian areas was completed by interdisciplinary teams across the entire monument. This rich baseline data could be mined for all allotments and compared to the current ecological conditions on the monument. Tensions between long term residents and the BLM has hindered the agency from making grazing decisions. How will BLM address this gridlock?	GSENM NOI Response.docx
Gorzalski	Christina	N/A	Rangeland health and livestock grazing management	At the scoping meeting in Kanab I was told that there is to be a feral cattle roundup on the river. What plan is in place to prevent this from happening again?	N/A
Berry	Scott	N/A	Rangeland health and livestock grazing management	Begin the collection and assembly of specific and geographically precise information from the grazing community about routes needed to functionally support current grazing levels, informing grazers that routes required for grazing activities will remain open to grazers via a Special Use Permit System (SUP), and described in the TAMS application.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Not Provided	Remove the GSENM cattle	N/A	Rangeland health and livestock grazing management	Cattle grazing causes damage to GSENM objects and values as well as other cultural and natural resources.	Climate Change and Livestock Use on Public Lands 2022.pdf
Berry	Scott	N/A	Rangeland health and livestock grazing management	Complete an investigation of potential ways to provide reasonable and fair financial inducements to grazers who voluntarily agree to permanently reduce active AUM's.	RAD Management (2).pdf
Berry	Scott	N/A	Rangeland health and livestock grazing management	Completion of an new high quality science assessment of the impacts of grazing on the health of the ecosystems within GSENM to include reliable information about the location and degree of impact in each location.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Lish	Christopher	N/A	Rangeland health and livestock grazing management	Decisions the BLM makes in this plan regarding grazing inside Glen Canyon must adhere to grazing management agreements with the National Park Service and ensure no resulting impairment to legally mandated park protection values.	220926_doi-blm-ut-p010-2022-0006-rmp-eis_grand_staircase-escalante.pdf

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Jorgensen	Helene	N/A	Rangeland health and livestock grazing management	Fencing should be removed as fencing is inconsistent with the mission of a national monument.	N/A
J	A	N/A	Rangeland health and livestock grazing management	Grazing activities should not degrade springs, threaten rare plants, damage cultural resources, or jeopardize riparian areas.	GSENM_20220923.pdf
Cox	Steven	N/A	Rangeland health and livestock grazing management	Grazing is an important historical use of monument lands. Due to climate change and the prolonged drought of many of the areas once suitable for grazing are now gone. A top priority for management is a better assessment of grazing conditions throughout the monument. This will require an increase in resource managers and range specialists. There are an increasing number of trespass cattle in fragile riparian areas. They are not only a threat to the ecosystems but to hikers. I have personally had an encounter with a dangerous feral bull in Choprock Canyon.	Comments on the Management Plan for the Grand Staircase Escalante National Monument.docx
Schwartz	Ephraim	N/A	Rangeland health and livestock grazing management	Grazing must be respectfully and reasonably decreased on areas within the Monument. In spite of my respect for the resilience and resources of the cattlemen, their impact upon the land worsens only increases the effects of the drought, adding to greater topsoil erosion and degradation of the native flora and fauna. It is time to shrink the area available for grazing, long past time to stop subsidizing an inefficient industry with tax dollars for water tanks, pipes, infrastructure, etc.	GSENM comments.docx
Weaver	Brad	N/A	Rangeland health and livestock grazing management	Grazing permittees should be required to provide water for their livestock away from perennial streams, seeps and springs to prevent water pollution of these fragile ecosystems by livestock. Unused grazing permits should be permanently retired, and current grazing permits should should generally not be renewed upon expiration or abandonment.	GSENM Scoping Comments.pdf
Berry	Scott	N/A	Rangeland health and livestock grazing management	Grazing. Specifically investigate, analyze and compare the role of grazing in GSENM in the spread of noxious weeds and invasive plants, using high quality science to quantify the grazing contribution, under each alternative, including an alternative that significantly reduces grazing loads in GSENM.	RAD Management (2).pdf
Rubin	David	N/A	Rangeland health and livestock grazing management	Grazing-Grazing damages cultural sites, vegetation, and microbial soils. Although grazing is permitted in GSENM, the impacts of grazing should be considered when reviewing individual grazing leases. Impacts of grazing include: (1) Cultural sites. As a geologist, I have worked with and published papers with archaeologists in Grand Canyon National Park, and I am familiar with how to detect cultural sites. I am disturbed wherever I see cattle tracks trampling across cultural sites containing charcoal, fire-cracked rocks, potsherds, and flakes. One such site occurs on Monument lands within walking distance of our house. (2) Since 2010, when we repaired the fence separating our property from GSENM lands, we have watched over the past decade as the vegetation on our cattle-excluded land has evolved to become more lush and less prickly. (3) Finally, visitors are instructed to avoid walking on microbial soil, so it is particularly troubling to walk for many miles away from any trailhead-seeing no human footprints-only to see widespread hoofprints deep into fragile microbial soils.	GSENM comments.pdf
Spotts	Richard	N/A	Rangeland health and livestock grazing management	Human uses like livestock grazing cannot continue if they may threaten or harm monument objects. BLM must not allow its multiple use and grazing biases to undermine object protection.	N/A
J	A	N/A	Rangeland health and livestock grazing management	I have concerns about cattle grazing in specific areas of the monument - Box Elder Canyon, Hackberry Canyon, Horse Canyon, Wolverine, other Escalante Canyons, Cottonwood Canyon, etc - but I've been told we have to wait until that specific lease is up for review before we can comment on potential changes to the timing or length of which these places are grazed.	GSENM_20220923.pdf
Berry	Scott	N/A	Rangeland health and livestock grazing management	Intermediate steps will be required. A good starting place would be a scientific determination through high quality science of exactly where traditional RHLG has the most deleterious impacts on the range of values (ROV's) within GSENM, combined with a creative exploration facilitated by the agency of how best to reduce or mitigate impacts in those specific locations. Diligent and good faith participation from all interested parties would be a necessity, with everyone operating with the understanding that the agency will act authoritatively if agreement cannot be reached.	RAD Management (2).pdf
Berry	Scott	N/A	Rangeland health and livestock grazing management	Investigation and analysis of this topic should not incorporate an assumption that grazing at its current scale will continue at GSENM. Rather, the initial assumption should be that grazing at current levels must satisfy a threshold consideration; whether and to what extent grazing at current levels is consistent with the protection and conservation mission described in Proclamation 10286.	RAD Management (2).pdf
Berry	Scott	N/A	Rangeland health and livestock grazing management	Investigation and analysis of this topic should reject an assumption that GSENM lands historically categorized as "available" for grazing must be managed to prioritize continued grazing. Any use of the traditional "availability" categorization should be reviewed for compliance with the conservation and science goals mandated in Proclamation 10286.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Spotts	Richard	N/A	Rangeland health and livestock grazing management	On livestock grazing, BLM must be honest about its past failure to properly manage monument grazing due to cowardice. BLM must recognize the need for long overdue grazing reforms including encouraging voluntary permit buyout and RMP allotment retirement. Cattle trample soils, help cheatgrass, destroy riparian habitats, and outcompete native wildlife for forage during an extreme drought. And past veg treatments improperly favored ranchers and hunters. BLM should apply conservation biology and landscape ecology science to the DEIS analysis. Potential impacts occur at different spatial and temporal scales. These are relevant in assessing direct, indirect, and cumulative effects.	N/A
Berry	Scott	N/A	Rangeland health and livestock grazing management	Replacement of current versions of forage and rangeland health standards and the adoption of new standards centered on quantifying ecosystem health in which forage production and availability are collateral components of measures of ecosystem health.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Berry	Scott	N/A	Rangeland health and livestock grazing management	Socio-Economic Considerations; The RMP process should recognize and address the socio-economic context in which RHLGM concerns arise; how can grazing lifeways in communities surrounding GSENM be supported in ways that are consistent with the conservation and science mission at GSENM?	RAD Management (2).pdf
Shelton	Carolyn	N/A	Rangeland health and livestock grazing management	Springs and water courses should be restored across the monument; no new waters should be established for grazing purposes; any existing grazing waters should specifically provide wildlife access.	N/A
Berry	Scott	N/A	Rangeland health and livestock grazing management	The adoption of new standards and procedures relating to the construction of range improvements (wells, ditches, water tanks, etc.) for grazing centered on mitigating impacts to ecosystem health and avoiding actions that simply distribute damaging impacts to unimpacted areas.	Berry GSENM RMP Scoping Comments 26 September 22.pdf

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Wallace	Katie	N/A	Rangeland health and livestock grazing management	The grazing management plan needs to take a significant look and consider discontinuation of “chaining” in creating forage regimes – in addition to creating poor forage, the lasting ecosystem effects are drastic, including the proliferation of invasive weeds and fire danger. There is strong research out there that chaining is a poor choice upon this landscape, and regulatory actions need to be taken so that the future of ranching and other ecosystems are ensured, as well as the fire safety of neighboring communities and roadways.	N/A
Sjogren	Morgan	N/A	Rangeland health and livestock grazing management	The grazing of livestock, which depends on far more water, must be managed, and revised according to these drought conditions. Likewise, all livestock should be kept out of springs and spring areas. Water is a precious resource in the desert, and increasingly so during this drought. The utmost care should be given to protect these areas. In places where livestock are permitted near springs, natural barriers should be implemented to keep them out of the source. Grazing areas should be managed with regard to drought conditions, this includes moving livestock or reducing the AUMs on an allotment.	40 Mile Gulch _ June 2018.pdf
Berry	Scott	N/A	Rangeland health and livestock grazing management	The implicit assumption that forage and rangeland health standards can serve as an adequate proxy for the evaluation of ecological system health should be discarded. These standards were developed to measure potential productivity of lands to produce livestock forage. Proxy measures for ecosystem health should focus on the components of those systems, including species distribution, community structure, population stability, and the effectiveness of water and carbon cycles. In the context of grazing, new standards analyzing impacts on ecosystem components should be developed and applied. For purposes of the RMP process, each alternative should center on how different grazing management alternatives will impact ecological health and the conservation of ROV's, and not on impacts to the continuation of grazing at current levels.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Spotts	Richard	N/A	Rangeland health and livestock grazing management	There is also growing recognition that things like biological soil crusts, pollinators, and unfragmented wildlife habitats are critically important to healthy ecosystems. Cattle grazing and related range improvements conflict with those things. All new or revised GSENM RMP grazing related decisions need to be specific enough so that tangible trends and outcomes can be accurately measured. The ability to measure decision effectiveness and implementation is essential to provide long overdue accountability.	N/A
Schwartz	Ephraim	N/A	Rangeland health and livestock grazing management	This naturally requires that you abandon chaining as a means of clearing land for cattle. The devastation to the flora and fauna is not justified by the financial return; these lands remain scarred for decades, further adding to the erosion of soils and terrain.	GSENM comments.docx
Allison	Robert	N/A	Rangeland health and livestock grazing management	1.A dialogue process to reduce and transform conflict between grazing and conservation on GSENM. This could also include and involve aspects of conflict over restoration. 2.Exploration of novel approaches to create incentives for ranchers to contribute to land restoration and conservation, drawing on examples from elsewhere in the world.	N/A
Fegely	Jen	N/A	Rangeland health and livestock grazing management	The presence of three rangeland management specialists and only one wildlife biologist on the BLM team is certainly concerning! It's beyond time to rethink that mindset. Grazing cattle in this area is completely ridiculous. The longstanding drought should make this a foregone conclusion, if not the beauty and fragility of this landscape under the best of conditions.	N/A
Harrington	Susie	N/A	Rangeland health and livestock grazing management	It is crucial to eliminate cows from the drainages of the Escalante. Gulch Canyon which I have previously hiked many times, has become in recent decades, completely destroyed. It looks and smells more like a feedlot than a wilderness canyon! This is not multiple use; this is failure. With the lack of vegetation in that canyon, the cows in more recent years have spilled onto the surrounding mesa, destroying those as well. The cows need to be completely removed from this area, both canyon and mesa top. It will take decades for the land to recover but the sooner the cows are removed, the sooner that can begin.	N/A
Not Provided	Not Provided	N/A	Rangeland health and livestock grazing management	Only permit cows to eat 30 percent of vegetation, maximum. The best available science shows that the land is healthier and grazing economics stronger when cattle eat only 30 percent of plants.	N/A
Not Provided	Utah citizen fed up with BLM corruption	N/A	Rangeland health and livestock grazing management	BLM has managed commercial livestock grazing in GSENM since its establishment many years ago the same or worse than non monument public domain lands. This demonstrates that BLM keeps violating the Antiquities Act and GSENM Proclamation by putting cattle and ranchers first. Why do a new GSENM RMP when BLM managers will ignore it? Where is the accountability when managers fail to protect monument objects? When will necessary grazing reforms be effectively addressed instead of repeatedly postponed?	N/A
Hartman	Bob	N/A	Rangeland health and livestock grazing management	Grazing allotments need to be subject to public hearings. Permittees need to make public all program payments made to them in addition to payments made to BLM for grazing. If a permittee wishes to sell an allotment the BLM should have the right of first refusal to purchase and retire the allotment. The ultimate goal should be to reduce the permitted grazing to the scientifically established capacity of the monument.	N/A
McCloy	Marjorie	N/A	Rangeland health and livestock grazing management	I would also like to comment on grazing. It is a horrible experience to come into a meadow full of ripe cow pies, or to walk a trail that has been hoofed into deep dust by cows, or a riparian area fouled by muddy holes and cow pies. Cows do not belong in riparian areas, full stop. As to the rest of the monument, let the number of cows match what is healthy for the land. I usually see cows scraping along the slickrock, crushing any nascent blade of grass they can find and leaving a landscape bereft of green but full of excrement. There are way too many cattle in the Monument. It's not good for the land, for the traveler, or for the cow.	N/A
Not Provided	BLM's grazing bias is wrong	N/A	Rangeland health and livestock grazing management	Cattle do not belong in GSENM. They are an alien, invasive species that cause substantial resource damage and harm GSENM objects and values. Their nominal private economic benefits do not outweigh their substantial adverse impacts on public resources.	N/A
Not Provided	Cattle grazing harms public lands	N/A	Rangeland health and livestock grazing management	BLM improperly manages some cattle grazing allotments within the NPS Glen Canyon National Recreation Area. This grazing violates some relevant NPS standards. BLM and NPS have been negligent in not enforcing these grazing standards. This is an important scoping issue that should be addressed during this current process. Thanks.	N/A
Not Provided	Frustrated at BLM cowardice	N/A	Rangeland health and livestock grazing management	Cattle grazing should be eliminated in the new GSENM RMP. Grazing causes many direct., indirect, and cumulative adverse impacts on the GSENM objects and values that BLM is required to protect. BLM has let its cowardice toward ranchers prevail in GSENM management. This must end. BLM's job is to protect monument objects and values in the GSENM. BLM managers need to start doing their job or else they should be fired.	N/A
Not Provided	I care about the GSENM	N/A	Rangeland health and livestock grazing management	Landscape scale analysis is also important on other issues. For example, to determine how continued private cattle grazing affects monument objects and values and other resources. This is relevant to whether the new RMP may designate monument areas as unavailable to future cattle grazing. This grazing poses significant impacts from causing soil erosion, destroying biological soil crusts, spreading invasive weeds, degrading water quality, harming riparian habitats, and competing with wildlife for drought stressed and limited forage.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Not Provided	Not Provided	N/A	Rangeland health and livestock grazing management	The science is clear that this grazing causes many adverse impacts on monument objects and other resources. But BLM managers do not follow the science. Instead they follow what is selfishly expedient for them.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Rangeland health and livestock grazing management	Rangeland Health and Livestock Grazing Management: As stated above, we support the retirement of grazing permits on a voluntary basis. This will help restore the heavily impacted grazed lands and protect native plant and animal species, as well as protect sensitive cultural sites from erosion, trampling, etc. With the goal of minimizing grazing activities, new range improvements should also be limited. The compounding effects of grazing on climate change related conditions should also be evaluated as a part the RMP and as a part of the science mission of GSENM. Rangeland and grazing management should be tied to the results of drought and climate studies and monitoring. Cultural resources (archeology, springs, and culturally important plants) should also be monitored for grazing impacts and protected accordingly.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Rangeland health and livestock grazing management	Paragraph between Diagram 5-1 and 5-2 is WRONG! Any person who observes cattle knows that they do not take out the roots of plants; especially grasses and woody species, only clip and fertilize. Sheep and cows prefer eating new growth on bushes over grasses. Cows do well on pinyon-juniper woodlands and often prune a tree as high as they can reach, leaving an umbrella-looking tree!	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Rangeland health and livestock grazing management	"Early explorers who passed through Escalante noted conditions favorable to the cattle industry. "On the Aquarius Plateau, there was another virgin range. As the second Powell expedition made its way from Kanab to the mouth of the Dirty Devil in the spring of 1872, the explorers observed that the country was covered with fine grass. Potato Valley was 'green with fresh June grass'I Frederick S. Dellenbaugh recorded that "all day we traveled over a rancher's paradise," and A. H. Thompson exuded over the "Best grass I have seen."2All in all, they judged the Aquarius Plateau as a perfect paradise for the rancher." (Frederick S. Dellenbaugh, "A Canyon Voyage," Yale University Press, New Haven, 1926, first printing 1908, Chapter 18" and account of the Trip from Kanab to the mouth of the Dirty Devil p 198. See also Almon Harris Thompson Diary, Utah Historical Quarterly Vol. VII, No. 1, 2, 3, 1939 edited by Herbert E. Gregor. 1 Frederick S. Dellenbaugh, "A Canyon Voyage," The narrative of the second Powell expedition down the Green-Colorado Rivers from Wyoming and the Exploration of the Lands in the Years 1871 and 1872 (Yale University Press, New Haven, 1926, first printing 1908) Chapter 18 "an account of the Trip from Kanab to the mouth of the Dirty Devil p 198 See also Almon Harris Thompson Diary, Utah Historical Quarterly Vol. VII, No 1, 2, 3 , 1939 edited by Herbert E. Gregor. 2 Thompson Diary, June 8, 1872	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Rangeland health and livestock grazing management	Table 5-6 ..."After European settlement, but before grazing became regulated with the passage of the Taylor Grazing Act in 1934, the area was LIKELY overgrazed by cattle and other forms of DOMESTIC livestock..." This statement is speculation and argumentative. It does not take into account drought, The Great Depression, and is a general conclusion not based on biographies and first-hand accounts.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Rangeland health and livestock grazing management	The same type of protection and safeguards given to endangered species should be given to promote a healthy habitat for range-fed beef, which have dwindled in number. New healthier and larger 'Beefmaster' and Bar Angus cattle have been introduced and proven superior. Cattle allotments should be managed to the fullest capacity and greatest benefit of the public. GSENM-BLM should contribute to mending fences, maintaining roads and bridges, corrals, water developments and supplying salt. Local cattlemen, at their own expense, built these services which have been enjoyed by BLM, too. Partnership with local government, Fish & Game and Forest Service employees should build and maintain pre-1996 access levels; if, in fact, the Monument is returned to original size.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Rangeland health and livestock grazing management	Clearly Tables show that competitive, transplanted species of herbivores are partly, if not wholly responsible, for any "overgrazing" occurring in GSENM. Drought and uncontrolled predators must also be factors, as well as the sheer numbers of bear, deer, elk, burros, pronghorn antelope, big horn sheep, wild mustangs, wild cattle, as well as small game. We recommend that numbers of competitive species be TRANSPLANTED to areas not within GSENM cattle allotments, or numbers of competitive species reduced to allow maximum sustainability of cattle AUMs originally issued when GSENM was proclaimed. Since this initiative is about including Bears Ears and Grand Staircase acreage as it was originally proclaimed with protecting cattle grazing, GSENM should, indeed, put their efforts into sustainability of cattle AUMS. In addition, cattlemen should be compensated by eliminating grazing fees as they are unfair if other competitive herbivores are not charged for consumption of salt, water development, road maintenance, predator control, and other services the cattlemen have been performing and also paying for.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Rangeland health and livestock grazing management	Since its inception, the Department of Interior employees assigned to Southern Utah have conducted scoping meetings, taken comments, and produced management plans which further prove declining numbers of private permits issued. A feeling of distrust and contention exists between BLM and long-standing citizens of the local communities. Cattlemen were promised that putting cattle allotments in Non-Use while there were re-seeding programs of crested wheat would produce better soils and result in more beef. Not true, within a few years, the land was suffering and the non-use was cancelled. It is noted with interest that some grazing allotments have been retired, but plants and vegetation numbers have not increased! Forest fires are the consequence of not managing the forest and removing dead and dying trees and excess underbrush. Since actual use levels averaged just over 41,000 AUMS over the past 20 years, figures should never be lower than this; and in fact to get the average, some years must be much higher. Introducing and planting the non-native Kochia Weed, Goat Heads, and Russian Olives Trees in the stream beds, crowded out the native grasses, but did little to reduce flooding or increase cattle permits, and ironically led to the inception of government-paid employees to remove them! History tells of the large forest fire near Bryce Canyon where timber growth is still lacking. Dixie National Forest and Kaibab have remained vibrant forests because of timber harvest, and this practice should be reopened and supported before skilled workmen are deceased.	N/A

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Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Rangeland health and livestock grazing management	<p>In 1934 congress passed the Taylor Grazing Act ("TGA") and created several grazing districts on the lands now designated as the GSENM.(69) The BLM had a statutory mandate to administer these lands for multiple uses including grazing.(70) Prior to the creation of the GSENM the Clinton administration pushed through regulatory grazing changes that allowed for permits to be acquired by individuals or entities that were not engaged in the livestock business and also authorized nonuse of the permits for conservation purposes.(71) Many people believe that these regulatory changes were a reflection of the conservation groups push to end grazing on public lands in the 1990's. This resulted in conservation groups paying ranchers to relinquish their grazing permits to the government to be permanently retired. (69) 43 U.S.C. section 315 (70) Federal Land Policy and Management Act, 43 U.S.C. § 1707 (71) See Karl n. Arruda &amp; Christopher Watson, The Rise and Fall of Grazing Reform, 32 LAND AND WATER L. REV. 413 (1997) In reviewing the Clinton era regulatory changes, the 10th circuit has said that the TGA, FLPMA, and the Public Rangeland Improvement Act (PRIA) "unambiguously reflect Congress's intent that the Secretary's authority to issue grazing permits be limited to permits issued for the purpose of grazing domestic livestock. None of these statutes authorized permits intended exclusively for conservation use."(72) Thus, the 10th circuit overturned the conservation-use provision of the Clinton grazing regulations. In contrast, the 10th circuit affirmed the expansion of permit eligible individuals and entities. This caused worry among the ranching community. However, in upholding the 10th circuit decision regarding the rule that applicants need not be involved in the livestock business to obtain a permit, the Supreme Court reassured ranchers that individuals could not obtain a permit for conservation purposes and mothball the permit, this would violate grazing regulations.(73) (72) Public Lands Council v. Babbitt, 154 F.3d 1160 (10th Cir. 1998) (73) Public lands Council v. Babbitt, 154 F.3d 1160 (10th Cir. 1998), Cert. granted, 528 U.S. 926, (1999), aff'd, 529 U.S. 728 (2000). (The Clinton Administration did not appeal the Tenth Circuit's ruling invalidating conservation use permits.) Despite these assurances, Grand Canyon Trust ("GCT") began to buy and trade grazing allotments in Glen Canyon National Recreation Area and the GSENM. GCT then relinquished the allotments to the BLM with the understanding that the BLM would perform an environmental assessment (EA) that would retire the allotment permanently. In 2002, Kane and Garfield Counties filed a formal protest of a proposed EA to retire certain allotments from grazing in the Monument. Around that same time, several local ranchers filed applications for grazing permits on the subject allotments. Shortly thereafter, GCT sent a letter to BLM withdrawing its offers to relinquish the permits. If the EA determined not to retire the allotments, the BLM would have reallocated those permits to other interested persons. To avoid losing permits for which GCT had paid money to obtain, the trust decided to become ranchers themselves. A year later, DOI issued a solicitor opinion concluding that before an allotment can be retired a land use plan decision/amendment must be made to determine that the lands are no longer chiefly valuable for grazing.(74) As a result of the formal protest, the DOI opinion, and GCT's rescission of their relinquishments, the BLM modified its EA decision to accept the relinquishment and put the allotments in temporary non-use until a grazing plan was completed that would amend the land use plan. However, by then most offers of relinquishment had been rescinded, and up until the new management plan was adopted in 2019, no allotments within the GSENM had been retired. (74) Solicitor's opinion M-37008 (May 3, 2003)</p>	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Rangeland health and livestock grazing management	<p>"The Secretary shall manage livestock grazing as authorized under existing permits or leases, and subject to appropriate terms and conditions in accordance with existing laws and regulations, consistent with the care and management of the objects identified above ... Should grazing permits or leases be voluntarily relinquished by existing holders, the Secretary shall retire from livestock grazing the lands covered by such permits or leases pursuant to the processes of applicable law. Forage shall not be reallocated for livestock grazing purposes unless the Secretary specifically finds that such reallocation will advance the purposes of this proclamation...."(68) (emphasis added). (68) Grand Staircase Proclamation at 57346; see also Bears Ears Proclamation at 57332-33 (Note that the language is slightly different in the two proclamations. Where the Bears Ears Proclamation references "Secretaries" the Grand Staircase Proclamation only states "Secretary", as Bears Ears National Monument is co-managed by both the Bureau of Land Management and the U.S. Forest Service, while the Grand Staircase-Escalante National Monument is managed solely by the Bureau of Land Management). This highlighted clause allowing for grazing permits or leases to be voluntarily relinquished and subsequently retired from livestock grazing (hereinafter referred to as the "Grazing Retirement Clause") is extremely concerning to the State, and the State opposes any land use planning decisions based on this clause. Before addressing each of the State's specific concerns with the Grazing Retirement Clause, it will be helpful to understand the introductory and background information set forth below, as this Clause is not the first attempt to retire grazing allotments within the GSENM region.</p>	GSENM RMP Scoping Comments 27SEPT2022.pdf

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Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Rangeland health and livestock grazing management	<p>12.6. Kane and Garfield CRMPs Kane County. It seems fitting that as the County with the bulk of the GSENM within its borders, that the Kane CRMP has adopted some of the most extensive findings and policy positions of the RMPs discussed herein. For example, discussing the rich livestock heritage of the County, the Kane CRMP begins the livestock discussion as follows: "The historical, cultural, educational and moral benefits of livestock grazing in the Escalante Region Multiple Use/Multiple Functions Grazing Zone are important to Kane County and its residents; and the loss of its rich historical culture that brings visitors to Kane County would cause irreparable harm to the economy and heritage. Kane County families have grazed and used the land for multiple generations, a loss of a portion of, or all of, its grazing rights would impact family economics and dynamics that cannot be replaced once lost. Kane County has depended on the livestock grazing industry throughout its history to provide economic stability to the county; therefore, livestock grazing must be protected to ensure the health, welfare, and safety of the citizens. The American legend of the "Cowboy" is found throughout the Escalante Region Grazing Zone and is part of the culture and history of Kane County's "Western Legends." This cultural legend is what brings the tourism and movie industries to the county and helps fuel the local economy. With livestock grazing being pushed out of the county by federal policies, this cultural icon, so identifiable with the persona of Kane County, is becoming endangered. Livestock grazing in Kane County has the greatest impact on county economics and needs to be protected at all costs. Kane County recognizes the impact and value livestock grazing provides and that the use of its public lands provides an economic benefit for all its residents and tourists. Kane County is sustained by a small population whose livelihoods have maintained the vast openness and natural beauty of the land treasured by visitors. All sources of economic support must be maintained at their highest possible level in order to sustain the economic stability of the County. To ensure this, the Kane County Board of Commissioners, the Land Use Authority, Resource Management Committee, and the Resource Steering Committee have dedicated themselves to a coordinated land use planning effort, which can hold the federal management agencies to standards set by Congress regarding continuation of multiple uses of federal lands. The Escalante Region Multiple Use/Multiple Functions Grazing Zone is intended to protect some of Kane County's most valuable assets, our families, our culture and our history that is unique to our area."(80) (80) Kane CRMP at 114.</p>	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Rangeland health and livestock grazing management	<p>Garfield County. Similarly, Livestock grazing plays an immensely important role in Garfield County. While the industry is important to the local economy, it is equally important to the local custom, culture, and heritage of its citizens. "Evaluations conducted by BLM, USDA Natural Resources Conservation Service, and Utah State University Extension independently concluded that for each Animal Unit Month ("AUM") of grazing permitted on the Monument, just under \$100 of economic activity is generated within the region through direct and indirect spending on goods and services."(91) In 2014, a Utah State University study concluded that "the economic sustainability of the Garfield County economic region is greatly weakened if GSENM livestock grazing allotments are lost by removing an industry, its supporting industries, and reducing the economic diversity of the region."(92) Additionally, livestock grazing in Garfield County has been designated a resource of cultural and historical significance.(93) It is protected by Garfield County's Protection of Cultural Resources Ordinance and is on the County Register of Cultural Resources.(94) Thus, it is a stated goal of Garfield County to "[p]reserve the history, culture, custom, and values of the grazing industry within the County."(95) (91) See Socio Economic Baseline Report for GSENM Grazing, 2015 p.38 (92) Id. (93) Garfield CRMP at 212 (94) Id. (95) Id. Recognizing the value of livestock grazing in the GSENM to Garfield County's economy, custom, culture, and heritage, and with knowledge of previous efforts made to retire grazing allotments within the Monument (analyzed infra), Garfield County codified an official position regarding allotment retirements. "Garfield County opposes grazing buyouts, and any other scheme to retire or reduce grazing AUMs and to prohibit their proper public use by qualified grazers. When grazing AUMs are given up by a public lands livestock grazer, those AUMs shall be made available for other qualified grazers to acquire and utilize."(96) It is the policy of the county that AUMs not be relinquished or retired in favor of conservation, wildlife, and/or other uses.(97) (96) Id. at 299 (97) Id. at 359 All three presidential proclamations on the GSENM (Clinton-6920; Trump-9682; and Biden-10286), agree that this landscape has played an important role in the settlement of the American West. Together they recognize the rich ranching history of Southern Utah.(98) They recognize the role of "latter day saint pioneers" as early settlers of the land. That descendant community still lives in the area today. Ranching and grazing on Monument lands is an important connection to their history and should not be severed from these lands. (98) See Proclamation 9682 - Modifying the Grand Staircase-Escalante National Monument "Historical use of the Kaiparowits area plays a very important part in the rich ranching history of southern Utah" See also,Proclamation 6920 - Establishment of the Grand Staircase-Escalante National Monument "Early Mormon Pioneers left many historic objects including... cowboy line camps."</p>	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Rangeland health and livestock grazing management	<p>In addition to the comments provided by PLPCO, the Utah Department of Agriculture and Food ("UDAF"), also provides its comments on livestock grazing as contained in Section 12.2. Utah has a rich history of agriculture and natural resources. Farming and ranching are iconic symbols of the west and an important part of Utah's cultural heritage. For many generations, livestock producers have worked diligently to conserve rangelands while also producing the needed food and fiber for people throughout the country. Proper livestock grazing is proven to beneficially contribute to healthy rangeland ecosystems. Additionally, more studies are showing that properly grazed landscapes act as a carbon sync and help store carbon. Catastrophic wildfires devastate forests and rangelands every year and result in hazardous air quality that spans hundreds of miles. Livestock grazing is an effective and cost-efficient way to reduce risk of catastrophic wildfires. Closing grazing allotments or restricting grazing does not help the rangeland. Restricting livestock grazing results in increased risk of catastrophic wildfire, lack of vegetative species diversity, and lack of wildlife species and habitat. It is also essential that rangeland improvement projects occur within the GSENM. Range improvement projects and vegetation treatments are needed management tools that help improve the long-term health and sustainability of the rangeland.</p>	GSENM RMP Scoping Comments 27SEPT2022.pdf

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Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Rangeland health and livestock grazing management	In recent years (and partially in response to land designations such as the Proclamations at issue), Kane County has seen a large increase in tourism and recreation. "Kane County supports the recreation industry, but not to the detriment of ranching and livestock grazing. Simple economic calculations show that recreation and tourism cannot replace the annual income that ranching and livestock generates for the county."(81) This statement is made clear when compared with an economic impact of livestock grazing in the GSENM study conducted by the Utah State University Extension and Economic Associates of Utah, Inc. The study, and data collected therefrom, made five very important showings, namely: (81) Id. at 91. "(i) Livestock grazing on GSENM is essential to the ranching industry in the region; (ii) Ranching is a highly valued culture in the region. It is the base of many community activities and traditions. It also provides social and cultural stability to communities in the region; (iii) Ranching is an important part of diversifying the economy of the region; (iv) Tourism cannot replace livestock grazing in the GSENM without substantial investments by GSENM, local governments, and the private sector into new tourist support infrastructures and services; and (v) GSENM is a multiple-use national monument with many defined missions in the Proclamation including, livestock grazing and science research, which can include rangeland restoration and range management research at an allotment scale."(82) (82) Id. at 108-109. As shown, the impact of grazing in Kane County (particularly within the GSENM) is not slight. In fact, "there are 90 allotments that are wholly or partially within the GSENM for a total of 1,855,600 acres. Within these allotments there are 76,957 active AUMs and Kane County is striving to activate the 29,000+ AUMs that are currently in suspended status throughout the County. (The actual number of 'cows on the ground' is closer to 40,000; the larger number [76,957] represents active permits on the books.)(83) As such, a "reduction or elimination of grazing on the Monument would cripple the livestock industry and have severe consequences for the people and economy of the county. Therefore, it is the position of Kane County...that livestock grazing continue on the Monument at levels consistent with the sustainability of the resource and the ranching industry. That includes increasing the levels of AUMs per allotment as the forage/utilization formulas support the increase."(84) (83) Id. at 75. (84) Id.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Rangeland health and livestock grazing management	Many people have a bias and inaccurate opinion of livestock grazing as a result of mere ignorance and lack of understanding how livestock grazing contributes to the overall welfare by providing sufficient food. In addition to produced food and various products from livestock, grazing animals can be an important factor in maintaining balanced and diverse ecosystems.	GSENM RMP Scoping Comments 27SEPT2022.pdf
King	Catherine	Utah Native Plant Society	Rangeland health and livestock grazing management	The BLM needs to better manage and limit livestock grazing in the monument with the objective of improved conditions on the ground. The current levels of grazing (utilization) have caused significant damage to native plants. UNPS urges a lower utilization than the current allowed level of 60% (which, in our observation, is often more than that). A more acceptable level would be 30% utilization which is ecologically superior to higher utilization levels and will allow forage to thrive for wildlife and possibly livestock.2 (2) Holecheck, J.L., Gomez, H., Molinar, F., & Galt, D. (1999). Grazing Studies: What We've Learned. Rangelands 21(2), 12-16; Carter, J. (2013). Utilization, Rest and Grazing Systems - A Review. 1-10; DeLong, D. (2015). Summary Basis for Building Wildlife Habitat-Needs & Protection into Forage Utilization Limits. 1-8.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Rangeland health and livestock grazing management	Livestock grazing is one of the most significant impacts to the native plants of GSENM. Cattle grazing should not adversely affect the objects for which the monument was designated. Grazing must be clearly and carefully evaluated, monitored, and annually adjusted in range operating plans.	UNPS on GSENM 2022 (1).docx
Pollock	Leland	Garfield County Commission	Rangeland health and livestock grazing management	As stated previously, we find that any alternatives that consider management of livestock grazing in the RMP to be outside of the scope of proclamation 6920. We encourage the BLM to continue to manage livestock grazing within the preexisting laws and that any changes to the levels of livestock grazing must be considered outside the scope of the monument. In managing livestock grazing on public and private lands, Garfield County's overall objective is to promote health, safety and welfare by ensuring the long-term health and productivity of a) public and private lands, b) the County's watersheds, c) the livestock industry, d) multiple social and environmental benefits that result from the custom, culture and heritage associated with the livestock industry, and e) cultural resources, ethnographic resources, and traditional uses associated with the livestock industry. Grazing is administered on public lands in accordance with the Taylor Grazing Act of 1934, and in so doing provides livestock-based economic opportunities in rural communities while contributing to the West's and America's social fabric and identity. Together, the County's public lands and private ranches maintain open spaces, provide habitat for wildlife, offer a myriad of recreational opportunities for public land users, and help preserve the custom, culture, heritage and character of the rural West. Livestock Grazing in Garfield County has been designated a resource of cultural and historic significance. Livestock Grazing is protected by Garfield County's Protection of Cultural Resources Ordinance No. 2013-1 and is on the County Register of Cultural Resources. In addition, the State of Utah has passed legislation recognizing the value of the livestock industry and outlining basic concepts to preserve its vigor. The American cowboy has been recognized by Congress and the President of the United States for his role in settling the West. Additionally, President Clinton recognized the rich human history of the area in the Grand Staircase-Escalante National Monument Proclamation. Livestock grazing is the last human endeavor of the American West that is shaped by nature. Livestock grazing continues to play a vital role in the health, welfare, custom, culture and heritage of Garfield County.	Garfield County Commission.pdf
Pollock	Leland	Garfield County Commission	Rangeland health and livestock grazing management	While we discourage any grazing management changes in association with this RMP, we do support healthy rangelands. We encourage the Monument to take an active role to manage vegetative and water resources to become as productive as feasible for livestock grazing. We recognize that a healthy and productive rangeland will not only benefit cattle but will also benefit wildlife, soils, and water quality and quantity. In regards to the grazing retirement clause identified in proclamation 10286, our codified official position is that we oppose grazing buyouts, and any other scheme to retire or reduce grazing AUM's and to prohibit their proper public use by qualified grazers. When grazing AUMs are given up by a public lands livestock grazer, those AUMs shall be made available for other qualified grazers to acquire and utilize. We do not support any retirement of AUMs in favor of conservation, wildlife, and/or other uses.	Garfield County Commission.pdf
Griffin	Simone	BlueRibbon Coalition	Recreation use and visitor services	Dispersed Camping We have already seen an increase in closing dispersed camping across public lands across the nation. The desire and need for outdoor recreation has grown tremendously the past few years with no end in sight.	GSENM Resource Management Plan Scoping.docx-2.pdf
Painter	Michael J.	Californians for Western Wilderness	Recreation use and visitor services	Dispersed sites should be monitored regularly to ensure that negative impacts to the surrounding areas are minimized	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Action Committee	CTVA	Capital Trail Vehicle Association	Recreation use and visitor services	The Grand Staircase-Escalante National Monument RMP project area should adequately address 19 significant issues associated with inadequate consideration of motorized recreational opportunities and the significant impacts on motorized recreationists that have occurred in the past 40 years. We strongly oppose the excessive closure of motorized access and motorized recreational opportunities.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Recreation use and visitor services	The agency should adequately consider that there are over 50,000,000 OHV recreationists in the United States and over 300,000 OHV recreationists in Utah plus a significant number of out-of-state OHV visitors.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Murray	Michael B.	Coalition to Protect America's National Parks	Recreation use and visitor services	As we stated in the section above, Longstanding Compatible Management of Grand Staircase-Escalante National Monument and National Parks, we encourage BLM to delineate management zones for the entire monument that emphasize certain types of management and experiences as it did in the original plan for Grand Staircase-Escalante - compatible with management goals and objects for adjacent national parks and Tribal recommendations and traditional uses, and consistent with protecting monument objects and values. Establishing desired future conditions for resource protection and recreation in management zones will help guide decisions on visitor use management including the appropriate number and flow of visitors, as well as areas with sensitive natural and cultural resources where access must be limited to protect objects and values.	NPCA & Coalition GSE RMP scoping FINAL.pdf
Murray	Michael B.	Coalition to Protect America's National Parks	Recreation use and visitor services	Visitor use and recreation monitoring, planning, implementation and adaptive management are time, resource and staff intensive, and we recognize that GSENM has limited staff resources to dedicate to this challenge. BLM can look to the adaptive visitor use management tools parks have put in place as models to manage the impact of visitors on resources, facilities and staff. Research measuring the impacts of visitors to ecosystems abounds as do frameworks for establishing and managing for desired conditions for visitor experience and resource integrity. 22 22 Interagency Visitor Use Management Framework available at <a href="https://visitorusemanagement.nps.gov/VUM/Framework">https://visitorusemanagement.nps.gov/VUM/Framework</a> and the story map for the Arches National Park Visitor Use, Access and Experience Planning Process available at <a href="https://storymaps.arcgis.com/stories/909991e9919f4722adf1700379074f99">https://storymaps.arcgis.com/stories/909991e9919f4722adf1700379074f99</a>	NPCA & Coalition GSE RMP scoping FINAL.pdf
McKay	Patrick	Colorado Offroad Trail Defenders	Recreation use and visitor services	Our primary interest in the new management planning process is ensuring that the new management plan continues to maintain existing high quality opportunities for motorized recreation within the monument.	Grand Staircase Escalante Scoping Comment .pdf
Gagner	Paul	Dreamland Safari Tours	Recreation use and visitor services	Front country users should be required to follow LNT principles, especially when it comes to waste management.	N/A
Popejoy	Mike	Grand Canyon Trust	Recreation use and visitor services	In designating SRMAs that include quiet recreation objectives alongside other recreation activities, we recommend BLM consider recreation management zones to protect quiet and non-motorized recreation and other resources. This provides a useful management tool to manage recreation resources in complex situations. When making divisions, each recreation management zone should have discrete objectives and provide guidance on specific present and future recreation opportunities.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Recreation use and visitor services	As an initial matter, and in keeping with the recommendations of the Recreation Report, we strongly believe BLM should consider delineating Management Zones for the entire Monument that emphasize certain types of management and experiences that would then be allocated for in the MMP. Precedent for this long-term and all-encompassing approach to recreation management comes from the Monument's original management plan, which then set the tone for other BLM-managed national Monuments and conservation lands, and was a successful approach in GSENM for twenty years prior to the 2020 plan revisions.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Recreation use and visitor services	As specified in the original Monument Management Plan, competitive events should not be permitted in Grand Staircase-Escalante National Monument. As discussed throughout these comments, BLM manages national monuments not under the FLPMA multiple use mandate, but rather under Presidential Proclamations, which established or restored the full size of Grand Staircase-Escalante National Monument. BLM must manage the Monument for the protection and preservation of its natural, cultural, historic and scientific values, and only allow uses other than those needed for protection of Monument objects when those uses do not conflict with its NLCS directives.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Recreation use and visitor services	The past decade has seen a rapid expansion of non-motorized recreation on Utah's public lands, and the COVID-19 pandemic has resulted in record numbers of visitors to Utah's unique landscapes, including to GSENM. This increased use has resulted in a correlated increase in adverse impacts to wilderness values, visitor experiences, natural and cultural resources, and wildlife. We know that the BLM recognizes and is also concerned about these impacts, but is overwhelmed and hindered by decreased funding and limited personnel, particularly for law enforcement, outreach, and education.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Recreation use and visitor services	We encourage the BLM to continue using special recreation management areas and similar designations for high-value or potential conflict areas for recreation on the Monument. Management focus for Special Recreation Management Areas (SRMA) is to "protect and enhance a targeted set of activities, experiences, benefits, and desired recreation setting characteristics," whereas Extensive Recreation Management Areas (ERMA) are managed to "support and sustain the principal recreation activities and the associated qualities and conditions of the ERMA." In SRMAs, recreation is typically the dominant use, and in ERMAs management is "commensurate with the management of other resources and resource uses." Whereas SRMAs are intended for more intensive management, ERMAs may be appropriate to designate for quiet-use, backcountry experiences and layer with other special designations that are compatible with quiet recreation, such as ACECs and lands with wilderness characteristics. Both SRMAs and ERMAs provide mechanisms for the BLM to actively manage different types of recreation to the benefit of users while meeting its primary obligation to protect Monument objects and values.	Appendix C - ACECs.pdf



Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Waggoner	Nathan	Grand Staircase Regional Guide Association	Recreation use and visitor services	SRMA (areas of increased visitation, and biological and historical significance) The Backcountry Zone should have SRMAs that are set aside to inform the public and guides of high impact areas. The goal of a SRMA should be to educate, not to limit public or commercial access. Just as guides have stipulations attached to their SRPs, so should the public abide by special regulations when entering a SRMA. Trails should be maintained within designated SRMAs to reduce social trail systems. SRMA regions should require free overnight camping permits and these special regulations should be issued with the permit. These stipulations should be location specific and they should inform the public of sensitive areas so the public and SRP holders can travel into these locations with informed impact and secure future use. Areas To be considered as SRMAs are as followed: 1)Escalante River Corridor 2)Upper and Lower Harris Wash 3)Egypt Slot Canyons and trailhead 4)Peek-a-boo and Spooky Slot Canyons 5)Horse Canyon 6)Little Death Hollow and Wolverine Loop 7)Upper Calf Creek 8)Bowington Trail 9)Mail Trail 10)Red Breaks 11)Cosmic Ashtray 12)Sand Creek 13)Boulder Creek Guides should play a positive and involved role in regions designated as SRMA to help reduce the impact of the public. Guiding in this region should be encouraged because local guides will be familiar with the trail systems and they would have prior knowledge of where sensitive areas are located. Guides can help limit social trails and provide interpretive information concerning items of antiquity and landscapes of cultural and biological significance.	Grand staircase regional Guide association scoping.docx
Waggoner	Nathan	Grand Staircase Regional Guide Association	Recreation use and visitor services	Zonal Management is what makes travel and exploration on this National Monument unique. It preserves the wilderness experience the public and our clientele seek. It is important to recognize that these adventures do not start at trail heads. But, rather it constitutes the entire experience from: accessing our gate-way communities, to traveling on the dirt roads used by the original pioneers and different tribal groups, to walking or riding packstock into a primitive wilderness. Taking part in all aspects of the Monument is paramount to the enjoyment and understanding of this unique landscape. As guides, we believe zonal management should be implemented, but we feel there is room for improvement. For starters, the zones should be simplified and their names should inform the public about the formalities involved in entering these zones. For example, The "Frontcountry" should be called the "Gateway Communities". The "Passage Zone" should be called the "Primitive Travel Zone". The "Outback Zone" should be incorporated in the "Primitive Zone" and it should be called the "Backcountry Zone".	Grand staircase regional Guide association scoping.docx
Waggoner	Nathan	Grand Staircase Regional Guide Association	Recreation use and visitor services	Therefore, we feel that education should always be the first step to addressing overutilized locations. If all the education possibilities are exhausted then the BLM should rely on visitor allocations such as limited permits. The guide community provides clients with practical, low-impact, backcountry leadership and deepens a visitor's understanding and appreciation of their environment through interpretive/educational components. We hope that the new management plan will rely on the guide community to continue to educate visitors in regions that see increased visitation to help them reduce their impact. Therefore, if access is limited to the public through a permitting system, we hope that we could have our own system of permitting outside the general public so we can continue to help educate and reduce impact in these delicate regions. What we don't want to see is guide services having to compete with the general public in online lotteries. We think systems akin to the Turweep permitting system would work better for GSENM. These permits allow a set number of people access to protected locations and have a separate percentage of guided trips available for those same locations during the same time.	Grand staircase regional Guide association scoping.docx
Poe	Noel	High Desert Backcountry Horsemen	Recreation use and visitor services	Within one year after signing the RMP, the District Manager should require separate booklets printed and made ready for distribution to the various GSENM user groups-hikers, bikers, equestrians, off highway vehicle owners, hunters, etc. You will find that HDBCH and the BCUtah officers will be interested in meeting with GSENM managers. We can help with writing a booklet for equestrian users in the National Monument. We think Kane County Tourism may also help and maybe even assist with funding these specific-user booklets. The Monument's domestic and international visitors need to be educated on how to "protect and respect" the cultural and natural resources. Consider a continuous video in your visitor centers that provides general information on "respecting and protecting" resources. We believe this step would be highly cost effective.	N/A
Poe	Noel	High Desert Backcountry Horsemen	Recreation use and visitor services	Continue to allow dispersed camping with horses in places that can accommodate them. However, BLM needs to educate equestrians in proper camping procedures. HDBCH recognizes that horses and riders may need to be limited and their use of sites must follow regulations and wise use. Please feel free to contact us for advice and input.	N/A
Poe	Noel	High Desert Backcountry Horsemen	Recreation use and visitor services	Continue to allow recreational horse and pack stock use within the National Monument. Day-Use by horse riders should not require a permit, unless the numbers of equestrians significantly increase. There may be a small number of unique, fragile locations where the numbers of horses need to be limited. If cattle are excluded from a site because of drought and/or sensitivity and there is no water or grass, the equestrians going on Day-Rides, should be informed but not prohibited.	N/A
Poe	Noel	High Desert Backcountry Horsemen	Recreation use and visitor services	Dogs (unless leashed) should be prohibited in the GSENM backcountry and Wilderness Study Areas (WSAs). A couple years ago, HDBCH started prohibiting dogs on the Chapter's monthly rides. That is something you should consider. Dogs that are not controlled are hard on wildlife, livestock and horses if not on a leash. It is difficult to control a dog on a leash from a horse. There can be an exception if the dog is trained and actively herding livestock with the permittee(s).	N/A
Poe	Noel	High Desert Backcountry Horsemen	Recreation use and visitor services	In the equestrian and other users' booklets mentioned above, please be sure to include a section about "Leave No Trace." for equestrians, as well as the other users.	N/A
Poe	Noel	High Desert Backcountry Horsemen	Recreation use and visitor services	Overnight use with pack horses and equestrian stock probably should be required to have permits to learn where they intend to camp overnight, how many nights and numbers in the party. This would also be an opportunity to pass out the booklet to equestrians that is discussed in Sections 4 & 5. This booklet for example, could encourage camping with horses at the trailheads where environmental impacts would be less. That means parking areas need to be increased in size, and guidelines posted and followed; i.e., horse manure needs to be cleaned up at trailheads. If the need develops to limit the group size for equestrians, do not set limits on the number of "heartbeats" but count number of riders. If the limit is 15 people in a hiking party, the limit for equestrian groups should also be 15.	N/A
Shu	Lyn	Highway 84 LLC	Recreation use and visitor services	Sanitary restrooms, trash removal, and shelter from storms should be available to the hikers and bicyclists, as well as motor-homes and Recreational vehicles. All-weather roads, maintained looped roads, and groomed trails, benefit everyone in the monument.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Not Provided	A Utah resident and BLM stakeholder	N/A	Recreation use and visitor services	For managing recreation, which is not a monument object or value but is an important consideration, the BLM should return to using management zones as it did for the original GSENM management plan, which can provide guidance for future recreation and travel management decisions while helping facilitate visitor experiences. This management tool worked well overall to protect the monument's objects and values for 20 years (before it was unlawfully reduced). In particular, the BLM must focus any growth and expansion of recreation use and facilities in front country areas where trails and facilities are already developed, while protecting and minimizing development of less-used backcountry areas (See attached report: Outdoor Recreation and Ecological Disturbance).	Recreation Report_Sept 2021.pdf
Weppner	William	N/A	Recreation use and visitor services	3.Currently, the Calf Creek campground is staffed with only a campground host who is poorly or inadequately trained on emergency responses. The increasing numbers of tourists visiting the Calf Creek location requires the area to be staffed by full time BLM staff properly educated in emergency response procedures and incident reporting. The campground host often fails to file an incident report to document the incident. If 911 is called and local first responders arrive on scene,GSENM management is obligated to assure that proper documentation of the incident and a review with first responder organizations occurs. 4.The Calf Creek Falls trail is dangerous, ADA non-compliant, and inadequately signed. Escalante Fire & Rescue and Garfield County EMS #506 have a rich history of responding to injured hikers on the Calf Creek Falls trail. Information provided by the BLM on the complexity and danger of this trail is misleading. Specific signage should be present at the beginning of the trail warning hikers of the length and dangers (protruding rocks, elevation changes, poor footing, off-camber slick rock, trip hazards, etc.). Signage at the beginning and on the trail should stress proper hydration and nutrition, effect of elevation, and exposure to low humidity. The actual trail needs to have hazards removed and be clearly marked or signed, including mileage markers. BLM staff should be available on the trail to assist struggling hikers. BLM literature, signs, websites, and social media should accurately reflect the dangers of the Calf Creek Falls trail and stress proper fitness and preparation of hikers. Contraindications for use of the trail should be properly and clearly stated (age, infirmity, cardiovascular disease, mobility problems, etc.). 5.Escalante Fire & Rescue and Garfield County EMS #506 have responded to numerous emergency incidents on the Calf Creek Falls trail requiring the victim to be carried out manually in a Stokes Basket. The trail is too dangerous and narrow to safely perform this response, yet we do it every time. This has been discussed with local BLM management to no avail. First Responders safety, their lives and livelihoods, are put at risk with no concern from the Monument management. For life threatening emergencies, a life flight landing zone needs to be established and maintained. In addition, an administrative access road paralleling the trail needs to be established for rescue UTV use. The safety of first responders is paramount and requires the use of every mechanical advantage possible.	N/A
Veranth	John	N/A	Recreation use and visitor services	6)A carsonite post with a "camp" symbol can be used to direct users to suitable sites screened from the main trail along popular canyon bottoms. 7)Likewise trailhead signs may be helpful at popular informal trails. 8)I can provide more detailed lists of informal trails if requested.	Veranth Scoping 926.pdf
Weppner	William	N/A	Recreation use and visitor services	7.Public safety and the safety of responding First Responders should NEVER be influenced by partisan politics or individual ideologies. The history and experience with emergencies and responses to Calf Creek since its management by the GSENM should be reviewed and used to make informed decisions.	N/A
Veranth	John	N/A	Recreation use and visitor services	A small parking area between Highway 12 and the power line is the start of a short downhill walk (First GPS digital cairn 37.8264, -111.41270) that goes downhill about 1/4 mile on a user-created trail to a viewpoint from which the lower falls are clearly visible about three-tenths of a mile away. It is possible to scramble north along the bench below the highway, and with some work a trail suitable for the general public could be marked to get visitors to an even closer viewpoint of the falls.	Veranth Scoping 926.pdf
Murray	Danielle	N/A	Recreation use and visitor services	a) Recreation- As stated clearly in the Grand Staircase Interim Management guidance, while recreation is "an important part of the user experience in Grand Staircase, these activities do not fall into the category of objects for which the monument was designated."17 Recreation is a discretionary use and must be managed to ensure protection of objects and values outlined in the proclamation. We recommend BLM take the following management actions: 17 <a href="https://www.blm.gov/sites/default/files/docs/2021-12/GSENM_Interim_Guidance_12_16_21_Final508_0.pdf">https://www.blm.gov/sites/default/files/docs/2021-12/GSENM_Interim_Guidance_12_16_21_Final508_0.pdf</a> - Establish recreation management areas emphasizing primitive and backcountry experiences consistent with the overall purpose of the national monument. - Disallow recreational activities, such as target shooting, motorized and mechanized recreation and rock climbing, in areas where harm may occur to the unit's objects and values. - Direct visitor uses to intensive visitor use zones and away from areas where there are potential conflicts with sensitive resources and/or primitive backcountry experience. - Develop clear standards for issuing special recreation permits, including managing group size, that are tied to protecting the unit's objects and values.	Scoping Comments GSENM- Conservation Lands Foundation.pdf
Veranth	John	N/A	Recreation use and visitor services	Backcountry information provided to visitors has a great effect on managing visitation and limiting visitor impacts. I find the current 2020-2022 GSENM website to be inferior to websites for other areas of comparable visitor interest. Much of the information and links are very generic and neither timely nor specific to local conditions. Occasionally I pose as a naive visitor when asking questions at a GSENM visitor center (most often the Escalante Multi-agency site). I usually find the desk staff friendly, but not particularly well informed. The backcountry patrol people know the ground, but if you want to talk to them you have to plan ahead and ask for a phone call back when they are available. Printed guidebooks, and even random websites, are usually much more detailed and comprehensive than the desk staff answers.	Veranth Scoping 926.pdf
John	Brandi	N/A	Recreation use and visitor services	BLM should not adopt standards for regulating organized events and group events on the monument that are arbitrary and capricious. They also should adopt standards in the RMP that don't curtail constitutionally protected rights. For example limiting group sizes to 50 "heartbeats" for a group event with a stated religious purpose is both arbitrary and capricious and a violation of religious freedom rights. BLM should adopt standards that allow for flexibility in permitted events with management practices that accommodate the vast majority of large groups that want to utilize the area.	N/A
Rudow	Rich	N/A	Recreation use and visitor services	Considering the long historic recreational use of these lands, CAC is staunchly supportive of continued recreational access to slot canyons within the monument. Recognizing that increased use can bring new challenges, we have a long history of working with public land managers to improve the conditions of the resource through public service projects, reduce resource impacts through thoughtful regulation, and facilitate public outreach to effect changes in behavior that benefit resource preservation. Because slot canyons are durable surfaces cleansed by frequent natural flooding, human impacts are generally not consequential and not permanent. We find closures of slot canyons to be an unnecessary management tool.	N/A

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Sjogren	Morgan	N/A	Recreation use and visitor services	Developed Recreation While increased visitation may warrant improved parking areas and pit toilets in some areas, these should remain minimally placed and as primitive as possible to preserve the frontier characteristics of GSENM. This is not a National Park and should not be paved over and sanitized as such. Areas that already have this recreation infrastructure should serve as primary focal sites.	40 Mile Gulch _ 2 May 2020.pdf
John	Brandi	N/A	Recreation use and visitor services	Dispersed camping is a popular recreational activity that also needs to be protected through these plans. Restricting use to designated sites or a specific number of sites is typically arbitrary and not based off best available science. Any user conflicts or possible resource damage can be solved through management solutions other than closure and the BLM needs to implement these practices first.	N/A
Sjogren	Morgan	N/A	Recreation use and visitor services	Focal Sites Designated focal sites steer visitors towards hikes most easily managed by the Bureau of Land Management for visitation, and therefore distract them from more sensitive cultural sites and landscapes. In my guidebooks, I made sure to direct hikers to more popular well-known hikes that are managed and monitored by the BLM. This was an effort in part to steer visitors away from more sensitive areas and sites.	40 Mile Gulch _ June 2018.pdf
Beltran	Erin	N/A	Recreation use and visitor services	GSENM is also in danger from so many of man's activities - including drought from climate change and habitat loss from (climate change and) excessive land use change by recreational motorized vehicles. Those vehicles are a downward spiral since they also pollute noise (negating wilderness quality for wildlife and quiet recreators) and carbon+ (exacerbating the greenhouse effect and global warming).	N/A
Veranth	John	N/A	Recreation use and visitor services	I have heard the agency objection that "we do not put new trails in WSAs" and similar. I disagree. I find nothing to support this position in the statutory language of the Wilderness Act nor in the monument proclamation. A lightly managed, hand-constructed trail causes no harm to wilderness values, but can greatly reduce resource impacts by directing travel along the least sensitive route and minimizing vegetation trampling and user-created alternative routes. A marked trail enhances the experience for visitors who are unfamiliar with the desert and improves public safety. Forest Service policy allows new trails in designated wilderness.	Veranth Scoping 926.pdf
Veranth	John	N/A	Recreation use and visitor services	I have observed greatly increased dispersed camping, especially on holiday weekends. In the 1990's one could find good sites on Friday of Memorial Day weekend, then the search had to be on Thursday, now even early in the week is problematic. Increased use of RVs and trailers has occurred in recent years.	Veranth Scoping 926.pdf
Ormond	Annette	N/A	Recreation use and visitor services	In the last 10 years or so, the tourism has exploded in this area, which I believe has had the largest negative impact on our lands. They come in driving their rental cars that they don't care about and they don't respect the land like the locals do. They drive fast and leave car parts scattered all over our dirt roads and trash and human waste everywhere. I think if there is anything that would improve the impact on our public lands, it would be putting a limit to the amount of people allowed in certain areas possibly by issuing use permits, but still allow the local community to utilize and care for the land. The installation of outhouses might help control some of the human waste issues.	Letter to GSENM 2022.pdf
Veranth	John	N/A	Recreation use and visitor services	Lower Calf Creek Falls is an example of a case where an alternative viewpoint could be valuable as a visitor experience. The 2021 Proclamation highlights the falls: "The area is distilled to its essence in Calf Creek Canyon, the home of towering Navajo Sandstone cliffs, lush vegetation, cultural sites, and a perennial stream with two waterfalls: a slender 88-foot plunge in the upper part of the canyon, and a 126-foot cascade farther downstream that is one of the more elegant waterfalls in the entire Southwest." A short access to a viewpoint may relieve demand on the canyon trail just as the lower viewpoint near the parking lot did for Delicate Arch in Arches NP.	Veranth Scoping 926.pdf
Orr	Nancy	N/A	Recreation use and visitor services	Manage visitation - all Utah parks and monuments have seen big increases in visitation, and it is getting ahead of management in places like Zions and Arches. With greater restrictions on visitation in our parks, the GSENM will see ever-increasing numbers of people who spill over from other places.	N/A
Veranth	John	N/A	Recreation use and visitor services	New trails are consistent with the 2021 proclamation which lists numerous sites that currently lack managed trail access. Quoting, "There are natural bridges and arches, such as Maverick Natural Bridge and Phipps Arch, the 130-foot tall Escalante Natural Bridge, and Bowington Arch; a large and unusual circular erosional sandstone formation that has sparked the public's imagination, as evidenced by its many names, including the Cosmic Navel."	Veranth Scoping 926.pdf
Sjogren	Morgan	N/A	Recreation use and visitor services	No camping within 1/2 mile of water sources. This is common camping etiquette and protects these waterways for wildlife. This needs to be made clear in education efforts. No camping within cultural sites or areas of known cultural resources or significance as specified by the Tribes. This needs to be made clear in education efforts and monitored.	40 Mile Gulch _ 2 May 2020.pdf
Dissel	Scott	N/A	Recreation use and visitor services	-Of course, human visitors should be allowed to experience the Monument, its unique solitude, silence, awe-inspiring landscape and especially its wilderness character. While I urge you to protect the resources to the greatest extent possible, I also urge you to use existing roads, campgrounds, camping areas (including disbursed camping areas) to allow for visitation rather than create new areas. These areas must be delineated, signed, and enforced as needed to prevent the damage caused by visitors who insist on finding, creating, or building new parking, camping, trails, routes, or recreational sites.	Grand Staircase Escalante Management Plan comments 9.27.2022.pdf
Lish	Christopher	N/A	Recreation use and visitor services	Protected public lands-like parks and monuments-cannot exist in isolation. Grand Staircase-Escalante plays a critical role in the region's interconnected natural, cultural, and recreational landscape. The federal government should return to managing the monument and the parks in an interconnected manner such that each unit serves as protection for its neighboring unit. To do this, the BLM should establish zones to manage recreation as it did in the original plan for Grand Staircase-Escalante- compatible with management goals and objects for adjacent federal land.	220926_doi-blm-ut-p010-2022-0006-rmp-eis_grand_staircase-escalante.pdf
Veranth	John	N/A	Recreation use and visitor services	Recommendations on Canyoneering 1) While the local trend is to avoid permanent bolts, there should be exceptions for situations where the safety benefit outweighs the intrusion. 2)The agency should work with the local canyoneering community regarding which routes should have semi-permanent anchors such as slings and buried rocks left in place. Dangerous situations can result when an under-equipped or inexperienced party finds that an expected anchor is no longer there because a purist removed it. 3)Commercial guiding in technical canyons is a way to allow a unique form of visitation and minimize resource damage. Commercial canyoneering guiding should be retained.	Veranth Scoping 926.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Veranth	John	N/A	Recreation use and visitor services	Recommendations on dispersed car camping: 1)Inventory current patterns of dispersed car-camping in all areas of the monument. Use differs between the Circle Cliffs and the lower Hole in the Rock Road. 2)Increase the number of existing sites physically marked with camping symbols, and also indicate "no camping" where needed to protect resources. 3)Identify already disturbed sites and "hard" slickrock sites that could be managed for camping in the future. 4)Plan for gradually increasing near-road camping demand over the plan duration due to increasing population, aging populations (backpackers becoming car campers), and more leisure time. 5)Base monument dispersed camping rules on the well-tested National Forest policies. I made this comment on the first monument management plan and repeat it again. 6)Consider additional fully developed (water, toilets, tables, fire rings) monument campgrounds as well as semi-primitive developed campgrounds (bring your own water, vault toilets).Deer Creek and Calf Creek are full nearly every day. Suitable sites for campgrounds exist throughout the monument. Designated campgrounds concentrates use and simplifies management. 7)Sooner Rocks is a delightful and popular but heavily impacted camping area that would benefit from formal designation (signs) and light-handed management. 8)There are many informal campsites along the Cottonwood Wash road that could be better managed. 9)The Lampstand road also has many sites suitable for designated dispersed camping.	Veranth Scoping 926.pdf
Veranth	John	N/A	Recreation use and visitor services	Recommendations on less visited places. 1)Stay the course, the less change the better for these areas. 2)Anticipate increased recreational interest and demand in coming years.	Veranth Scoping 926.pdf
Veranth	John	N/A	Recreation use and visitor services	Recommendations on new (informal) trails: i can provide GSENM staff with many examples of existing tracks on the ground that could be managed as trails if the issue of BLM trails in WSAs is resolved. For illustrative examples: 1)Consider managing the "Cream Cellar" route from Head of Rocks to the highway descent to the Escalante River as a designated trail. it is an easy 2-hour hike with a car shuttle, follows existing tracks, and has outstanding view all the way. 2)Phipps Wash, which runs alongside Highway 12 and the Sheffield Road has multiple access points (informal trailheads) ranging from a cattle trail to serious scrambles plus the entrance/exit at the river. Many alternatives, both one-way and loops, from a few hours to a full day are possible in this easily accessible drainage. The area is suitable for hiking any month of the year (yes, I hike there in December and January by staying on south-facing areas). I consider Phipps Wash one of the best places to bring friends unfamiliar with the Escalante Canyons because of its mix of slickrock, riparian areas, arches and bridges, archaeology, varied terrain, and views. I could easy map out a whole network of routes from easy to difficult in this one area. 3)The Circle Cliffs is full of old roads up onto mesas. One of my favorites is the old bladed track up onto Studhorse Peaks. Most of the way is wide bench cut in the hillside. With a sign located at a small parking area, a few trail arrow markers in the PJ at the bottom, and some repair work on one short washout this could be a popular hike from the Burr Trail. The views are fantastic. 4)Many other similar historic tracks have been hand-marked on BLM maps that I have seen, and other abandoned routes are on old topographic maps or are visible on aerial photos. An inventory of historic tracks that could be managed as informal hiking trails should be included in the management plan and could even be largely be an office exercise.	Veranth Scoping 926.pdf
Veranth	John	N/A	Recreation use and visitor services	Recommendations on Trash and Sanitation. 1) Have a long-range plan to increase the availability of toilets at high-use trailheads. Inventory the toilet paper behind the bushes to see where a need currently exists. 2) As a backcountry user and as a local taxpayer I advocate ongoing cooperation with the counties on trash collection and removal. 3) Public-private partnerships with businesses in gateway communities could increase the availability of toilets and trash dumpsters while bringing customers to the business location. 4)Encourage or require use of WAG bags to increase to protect water quality in popular backpacking canyon bottoms, but not in upland areas where human use is dispersed and grazing is active.	Veranth Scoping 926.pdf
Sjogren	Morgan	N/A	Recreation use and visitor services	Recreation Outdoor recreation, both motorized and human powered, has increased dramatically across the monument and especially in the last few years during the Covid-19 pandemic. As an avid outdoor recreator I am concerned that the impacts of recreational activities are not being managed properly to protect monument objects. I was inspired to write a hiking guidebook to Grand Staircase-Escalante National Monument and Bears Ears National Monument, in part to help educate the public about visiting these monuments respectfully and while leaving a minimal trace. These educational efforts need to increase as visitation increases, through public signage, increased ranger presence, online/social media education, and in some cases, permits.	40 Mile Gulch _ June 2018.pdf
Lish	Christopher	N/A	Recreation use and visitor services	Recreation permits and closure of off-road vehicle routes should be considered where necessary to preserve primitive experiences and sensitive historic, prehistoric and scientific resources.	220926_doi-blm-ut-p010-2022-0006-rmp-eis_grand_staircase-escalante.pdf
Eaton	Marietta	N/A	Recreation use and visitor services	Returning to a use of zones for recreation management will provide the public with information to curate individual experiences within each person's capabilities. With modifications from the first RMP areas with the most threatened ROVs must be identified internally by BLM and considered the highest priority for protection. On the other hand, visitation would then be focused on less sensitive areas where impacts can be minimized. How will the analysis identify areas for protection and/or recreation? What other mechanisms will BLM use to address deteriorating conditions at locations such as Calf Cek Falls, Hackberry Canyon, Lick Wash, Deer Creek, Escalante River tributaries and Dancehall Rock, to mention a few?	GSENM NOI Response.docx
Rubin	David	N/A	Recreation use and visitor services	Similarly, new campsites keep appearing along Old Sheffield Rd. Despite the fact that my wife and I are now 71, and my wife has two replaced hips and one replaced knee, we still love the wildness and undeveloped nature of the land. We are still able to hike cross-country to undiscovered destinations, even if the hikes are shorter than when we were younger. And even though our hiking distance is now limited by age and joints, I would rather have limited access to these still-wild places than have access by road to places that are no longer wild.	2017 Rubin et al Geology.pdf
Not Provided	A Utah resident and BLM stakeholder	N/A	Recreation use and visitor services	Special Recreation Permits and group size limits should prioritize the protection of monument resources. Again, the primary purpose of the monument is to protect the landscape and its scientific, natural, scenic, and cultural resources, not to facilitate expansive recreation, which has a high potential to harm these monument values.	Recreation Report_Sept 2021.pdf
Eaton	Marietta	N/A	Recreation use and visitor services	Specific locales will require use allocations to protect sensitive and threatened resources while facilitating a quality experience. What strategies would BLM envision to accomplish long term protections? BLM ought to develop thresholds that trigger actions that avoid impact to areas with sensitive ROVs and track the rates of change. In rare cases, developed facilities in the front country, such as bathrooms and trash collection, may also be necessary for public safety, health, and protection of ROVs. GSENM is not an amusement park, and it should not be managed as such. This plan must go beyond the present and focus an eye to future generations, not be reactive only to present conditions and concerns.	GSENM NOI Response.docx

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Plummer	Richard	N/A	Recreation use and visitor services	The BLMs management plan should prioritize the protection of monument resources - cultural and natural., scenic and scientific. Thus the BLM should adopt Group size limits and carefully manage special recreation permits. Large-scale recreation (especially commercial recreational events) risks damage the environment of this special place.	N/A
Veranth	John	N/A	Recreation use and visitor services	The current system of pack-it-out to the county dumpsters works. It is not unreasonable to ask visitors to bring their trash to dumpsters located adjacent to paved highways. But, more capacity is needed. The dumpsters in Boulder overfill every week during the tourist season	Veranth Scoping 926.pdf
Veranth	John	N/A	Recreation use and visitor services	The existing management of human waste and visitor garbage is sort of working, but improvements are needed. Although I consider the new toilets at the Spooky / Peek-a-boo trailhead a visual intrusion after driving a hour on a primitive road I fully support this type of sanitation measure. The Burr Trail - Circle Cliffs - Wolverine Loop is seriously lacking in sanitation facilities. The portable toilet at the top of the Burr Trail switchbacks is long gone. The sanitation management challenge will be funding for initial construction and the ongoing cost of the pump-out trucks.	Veranth Scoping 926.pdf
Veranth	John	N/A	Recreation use and visitor services	The GSENM has many areas where new trails could be officially recognized to diversify the visitor experience. Opportunities exist for both high-standard developed trails (see "New viewpoints and short trails" below as well as informal or primitive trails consisting only of a line on a map and cairns maintained by an occasional backcountry patrol. Many historic cattle driveways, pioneer roads, and uranium exploration roads already exist on the ground and make great hikes for a seasoned explorer. Add a trailhead sign and a few cairns and it these routes could be recommended to the general public by visitor center staff.	Veranth Scoping 926.pdf
Trimble	Stephen	N/A	Recreation use and visitor services	The Monument proclamation designates spectacular geologic, ecosystem, visual, historic, paleontological, and cultural resources for protection. It was not designated as a recreation-focused Monument, and should not be managed in a way that provides for promotion and expansion of recreation at the expense of the resources and values the BLM is obligated to protect. The "opportunity to experience a remote landscape rich with opportunities for adventure and self-discovery" is an "object" described in the proclamation. This is the BLM's challenge-to provide these experiences but to maintain their quality and feeling of remoteness. BLM must and should take a proactive and planned approach to managing recreation and can't just respond to pressures as they happen. BLM should use the recreation management principles in the Monz Recreation Report and provide a zoned approach that concentrates recreation and visitor use in frontcountry locations and protects primitive backcountry experiences throughout most of the Monument. In particular, the BLM must focus any growth and expansion of recreation use and facilities in frontcountry areas where trails and facilities are already developed, while protecting and minimizing development of less-used backcountry areas. Special Recreation Permits and group size limits should prioritize the protection of monument resources. Again, the primary purpose of the monument is to protect the landscape and its scientific, natural, scenic, and cultural resources, not to facilitate expansive recreation, which has a high potential to harm these monument values. Critical parts of this primitive backcountry experience include the quiet soundscape and dark night skies. GSENM is the quietest and darkest place in the lower 48 states. The BLM must preserve these increasingly rare resources. One way to do this is to proactively plan for increased helicopter use and set clear, strong guidance to protect natural soundscapes, sensitive wildlife, and the visitor experience of quiet.	GSE RMP comments 9-2022.pdf
Gedeon	Tomas	N/A	Recreation use and visitor services	The most disturbing sights I encountered were (1) sounds of motorized users that disturb quiet solitude, but also make permanent scars in the sensitive desert, and (2) desert destroyed by hoofs of the cattle. Sensitive crypto soils are trampled and this destruction is long lasting. Only by visiting remote places in the canyons I realized how much destruction cattle and motorized used brought to Escalante desert.	N/A
Veranth	John	N/A	Recreation use and visitor services	There is a serious need for better management of dispersed camping near roads. The previous management plan was inconsistent. Designated campsites were mention, but few were ever designated, even at well-used popular places. Camping was prohibited at trailheads even though this is the logical place to crash pad camp at the beginning or end of a backpack. Camping near corrals is nominally prohibited even though these disturbed areas make excellent campsites.	Veranth Scoping 926.pdf
Not Provided	Not Provided	N/A	Recreation use and visitor services	There should be no further consideration of lottery permit systems to visit public lands in this area! It has been rumored that this is being considered for the slot canyons of Dry Fork and Coyote gulch. Please do not implement restrictions to visitation to our public lands.	N/A
Grimm	Paul	N/A	Recreation use and visitor services	Very briefly, future management plans should implement quotas for visitation to both specific point locations (say, Lower Calf Creek Falls, Peekaboo-Spooky Slots, and/or Cosmic Vortex) or entire geographic zones (say, specific canyon systems, or other regions like Escalante Canyons at-large, or Kaiparowitz at-large, or Grand Staircase at-large) on either basis: Daily quotas with individual special recreation permits (ie, day hiking fees) for specific locations; or Overall quotas for guiding companies for given geographic zones. It's not clear to me what is considered "land use planning" versus "implementation-level planning" but I hope the concept of quotas in some form is concerned for certain areas to maximize safety, limit resource damage and improve/maintain a good visitor experience.	N/A
Not Provided	Jaden	N/A	Recreation use and visitor services	3. Return to using management zones.	N/A
Not Provided	Jaden	N/A	Recreation use and visitor services	4. Any growth and expansion of recreation use and facilities should happen in areas with developed trails and facilities while minimizing the development of less-used backcountry areas.	N/A
Veranth	John	N/A	Recreation use and visitor services	More roadside view areas and short trails of a mile or less would greatly enhance casual visitor experience. Visitation to the GSENM today is far different from the limited backpacker focused pattern of 1970s and 1980s, but the inventory of designated and maintained sites is essentially what existed before the monument. Now many visitors are passing through on a loop of the Mighty Five and spend only a few hours in the monument. Other visitors are staying in lodging in the gateway cities and want to do day trips visiting multiple sites rather than doing a single, strenuous all-day hike. I often see tourists stop at the Escalante River bridge, walk from the trailhead register to the stream, stand a while in the shade, then return to the cars.	Veranth Scoping 926.pdf

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Sjogren	Morgan	N/A	Recreation use and visitor services	Provide and emphasize visitor education services in collaboration with the Tribes. Information and interpretation should also be included in this. Frequently visiting hikers ask the same questions, often to fellow hikers like me, when they are starting out their hikes. The BLM needs to assess and address the visitor experience to improve visitor access to educational information (especially safety, visiting cultural sites with respect, and Leave No Trace) BEFORE visitors arrive at Trailheads. Improved signage is warranted in some areas. Directing Visitors once annually to watch an educational video and go over protocol with rangers as is done in Grand Gulch would also be helpful for visitors to the most popular areas (Calf Cree, Peek-a-Boo/Spooky, Zebra, and the Escalante River).	40 Mile Gulch _ 2 May 2020.pdf
Veranth	John	N/A	Recreation use and visitor services	Recommendations on guides and guidebooks. 1) Establish public-private partnerships to create documents that enhance visitor experience and resource protection. 2) Continue to issue permits for all types of private guiding in the GSENM ranging from nature guiding from a vehicle to extreme backcountry adventures.	Veranth Scoping 926.pdf
Isaly	Ellen	N/A	Recreation use and visitor services	Recreation permits and closure of off-road vehicle routes should be considered where necessary to preserve primitive experiences and sensitive historic, prehistoric and scientific resources.	N/A
Eaton	Marietta	N/A	Recreation use and visitor services	Since 1996, recreation has burgeoned beyond BLM's current staffing capacity. The current proclamation identifies it as a value to the public. How will BLM address this in the plan in a way that prioritizes conservation? If the current trends continue the aspirational desires identified in the Notice of Intent (NOI) will remain only that.	GSENM NOI Response.docx
Veranth	John	N/A	Recreation use and visitor services	Some preservation advocates and agency staff have recommended excessive restrictions on canyoneering. I presume canyoneering advocacy organizations will provide appropriate comments regarding technical descents of canyons in the GSENM. Canyoneering is a recreational activity explicitly mentioned in the 2021 proclamation and should be managed lightly.	Veranth Scoping 926.pdf
Veranth	John	N/A	Recreation use and visitor services	The ability to camp far from town out in the monument is a major value. The 2021 Proclamation stated: "The Grand Staircase-Escalante's large, isolated, and, at times, impenetrable landscape is one of the most naturally dark outdoor spaces left in America, providing views of the cosmos that are nearly unrivaled in the contiguous United States, and an opportunity for visitors to encounter a landscape at night, undisturbed by electric lights, in the same way people have experienced the West for most of America's history."	Veranth Scoping 926.pdf
Escalante resident	Not Provided	N/A	Recreation use and visitor services	The BLM should consider how to manage base jumping in GSENM. Although it is allowed on BLM lands, not all sites are appropriate: for example, sites where the landing is near Native American rock art of structures, is frequented by other visitors, or is near raptor nesting or other critical wildlife habitat. The BLM in Moab is beginning to develop this kind of management.	N/A
Carroll	Lynn	N/A	Recreation use and visitor services	The original Grand Staircase-Escalante management plan used management zones to allow for quality visitor experiences while protecting the monument's values and objects. This approach reportedly worked well, so it should be reinstated in the new management plan.	N/A
Clayson	Dirk	N/A	Recreation use and visitor services	Add motorized recreation, jeeping, UTV, motorcycle riding to the description of recreation activities. The reality is that almost all forms of recreation, ie: hiking, hunting, canyoneering, etc also include an element of motorized transportation to get to the point that these activities start. I would guess that at any time, if you could see the human interaction on the lands, that 90% would be involved in some type of motorized transportation. This has been the case from the mid 1900s to now. It simply seems odd and deliberate that these activities are not clarified and included in managing the future of these lands. Some day, maybe we will access lands with Star Wars type hover crafts, but for now we access lands with motorized vehicles, gas, diesel, or electric	N/A
Not Provided	Not Provided	N/A	Recreation use and visitor services	Aside from the visitor centers, recreational infrastructure is insufficient, aside from a handful of campground and few developed trailheads. There needs to be more information available including maps, viewpoints, etc. to guide visitors.	N/A
Weaver	Brad	N/A	Recreation use and visitor services	Campgrounds should be constructed and maintained along GSENM boundaries, along major travel routes inside the GSENM and adjacent to popular points of interest frequented by visitors. These campgrounds should have at least one pit toilet and a spigoted source for potable water, if available. These campgrounds should include numbered slips for multiple small groups. Each slip should be equipped with a constructed fire ring, parking for 2 vehicles and space for 2 or 3 tents. Camping for large groups or large RVs seeking amenities should not be supported or encouraged inside the GSENM.	GSENM Scoping Comments.pdf
Weaver	Brad	N/A	Recreation use and visitor services	Camping inside the GSENM should continue to be allowed. A "leave no trace" policy should govern camping inside the GSENM. Existing primitive campsites in the GSENM should remain open and accessible to visitors by current means of access. Campsites established inside the GSENM over past generations of Americans should be preserved and remain available for use by current and future visitors. These old "cowboy camps" should be included among GSENM historic resources and managed as such for ongoing use as campsites for individuals, couples, families and for small groups of similar size under a "leave no trace" policy. Locations for these ancestral campsites should not be widely published.	GSENM Scoping Comments.pdf
Not Provided	Not Provided	N/A	Recreation use and visitor services	Camping restrictions/group size limitations especially in proximity to main travel routes such as the Hole-in the Rock road should NOT be limited in numbers! These were pre-monument traditional uses that should not have been manage and impacted in such a way.	N/A
Veranth	John	N/A	Recreation use and visitor services	Clear visitor suggestions along the line of "What to do if you have a few hours / a half day / all day / several days" should be highly visible on the GSENM website, on signboards, and in handouts at visitor centers.	Veranth Scoping 926.pdf
Berry	Scott	N/A	Recreation use and visitor services	Communicate to the public in effective ways that recreational visitation in GSENM will be subject to limits that ensure conservation of the ROV's present in GSENM; that recreational visitation, while important and valued, is a conditional use at GSENM.	RAD Management (2).pdf
Schwartz	Ephraim	N/A	Recreation use and visitor services	Concentrate the traffic in the front country as a way to preserve the backcountry. The advent of social media has made it possible for anyone to easily learn about features that were once protected by their inaccessibility. Through the permitting process these backcountry areas can be protected.	GSENM comments.docx
Veranth	John	N/A	Recreation use and visitor services	Concentrating use in a few areas facilitates ranger patrol and visitor contact by resource staff. Current management is concentrating visitation reasonably well, but at the expense of parking congestion and intense visitation at a few sites like Lower Calf Creek Falls. The vast majority of trails suggested at visitor centers, described in guidebooks, and shown on maps like Trails Illustrated are in the canyon bottom corridors. The canyon bottoms have the advantages of occasional drinking water, and ease of navigation, but are the most sensitive area for flora and fauna, and the concentrated human use leads to campsite degradation and sanitation problems.	Veranth Scoping 926.pdf

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Berry	Scott	N/A	Recreation use and visitor services	Develop and implement a new on-line mapping product /app for public distribution that will clearly delineate various categories of recreational zones, including the activities permitted therein, and limitations on numbers of visitors where appropriate.	RAD Management (2).pdf
Berry	Scott	N/A	Recreation use and visitor services	Discard the approach that suggests that the optimal way to address increasing visitation is to increase visitor facilities lock step with increasing visitation. Visitor facilities should be designed and administered in such a way as to ensure that visitation does not exceed carrying capacity.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Orr	Nancy	N/A	Recreation use and visitor services	Do not allow any motorized events - Moab is suffering the consequences of allowing too much motor-intensive recreation, and we are unable to rewind that bad decision. GSENM management should be more restrictive than most BLM lands management, and emphasis should be placed on human-powered visitation, in order to protect the Monument for the benefit of all species, not just motorized homo sapiens.	N/A
J	A	N/A	Recreation use and visitor services	HEAVY VISITATION: Include explicit language about how you plan to address increased visitation in certain areas, as well as increased visitation overall. For example, what thresholds would cause you to require permits at the Peekaboo/Spooky/Dry Fork TH? Or make you consider expansion of a parking lot? No new campgrounds without public scoping, no new air strips, no cross-country competitive events, and ABSOLUTELY NO MOTORIZED EVENTS. If you can manage the people, you can protect the land for future generations. Much of the uses allowable on other BLM lands should not be allowed in GSENM.	GSENM_20220923.pdf
Veranth	John	N/A	Recreation use and visitor services	I recommend having better backcountry trail information available to visitor center staff for occasions where a person specifically asks about a place, but continue the current practice of letting most of this information be provided by private sources (websites and guidebooks).	Veranth Scoping 926.pdf
Clayson	Dirk	N/A	Recreation use and visitor services	I would like to see plans for management of recreation and users, such as trail heads, restrooms, trash, other items so that the use in the areas can be managed rather than trying to artificially reduce the demand.	N/A
Berry	Scott	N/A	Recreation use and visitor services	Identify and precisely describe the most commonly used dispersed roadside camping sites. Those sites which can be used with the least risk of detrimental impact to adjacent ROV's will be identified (Best Use Sites (BUS)). Simple camp site boundary markers will be placed along the borders and corners of BUS to inform users of permitted camp boundaries. (Similar to the system used in Canyonlands National Park). The BUS sites will be monitored for over a two year period, so that use can eventually be used to coordinate with other visitor management features of the TAMS.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Berry	Scott	N/A	Recreation use and visitor services	Investigate what methods of visitor management could be used to ensure that visitation remains within carrying capacity limits, including consideration of the type of impacts associated with different types of recreation.	RAD Management (2).pdf
Rudow	Rich	N/A	Recreation use and visitor services	Mindful of our impact inside technical slot canyons with rope grooves and fixed anchors, considerable development has been conducted to enable technical descents of slot canyons with new techniques that don't rely on fixed anchors and don't leave rope grooves in soft rock. These new tools, such as the fiddle stick, water trap, and sand trap demonstrate our commitment to low impact visitation. With that said, there are still times where fixed anchors (bolts) are necessary for safety and we fully support a balanced management philosophy that allows the continued use of fixed anchors.	N/A
Shakespeare	Dave	N/A	Recreation use and visitor services	One thing I have noticed that is missing from the GSENM is the recreational component of mountain biking trails. I have been part of and noticed a huge trend with Mountain biking in outdoor recreation. I see more and more vehicles with a mountain bike strapped to the back of a vehicle driving through Kanab, but they don't have a reason to stay here because there aren't very many options for places to ride. So, they drive on to other destinations that have the mountain bike trails. Nearby communities have noticed and accommodated to this recreational trend. St. George, Hurricane and Cedar City have excellent riding trails, that MTBProject.com calls "world class". I feel the BLM's example in these nearby communities could benefit the GSENM. I am not a geologist or wildlife biologist or a hydrologist (although my brother who loves mountain biking and works for the forest service out of Cedar City is a hydrologist), but I am a recreationist who has found the enjoyment of mountain biking and can see the great potential near Kanab. There is a lot of sand near Kanab which is difficult to bike in but there are plenty of areas that would still work just fine for a mountain biking trail. I think the example to look at is the Gooseberry Mesa area by Hurricane, UT. My limited geology understanding is that Gooseberry Mesa is part of the Shinarump conglomerate which extends through Kanab into the GSENM. This is a world class destination near Hurricane and an excellent mountain biking area with little sand. I feel we could have similar mountain biking here by Kanab and am very pleased to hear of the tilted mesa mountain biking trail currently being built south of Johnson canyon on this shinarump formation. I believe it will be an excellent destination for mountain bikers and I support and encourage more mountain biking trails like this. I have ridden my bike on many old dirt roads near Kanab and there are many areas that are fit for mountain biking, but there are no trails made for or allow mountain biking (the cottonwood trail west of Kanab only allows horses and hiking, but this would be an excellent mountain bike trail; and it's already built!). I have noticed going east towards Page has many miles of potential good land for mountain biking, I have ridden old roads underneath the vermillion cliffs, such as the Seamans wash and Fin little roads that not far off highway 89 look like good mountain biking areas to me. I asked my brother who lives in cedar City about how he felt about the mountain biking trails near Cedar City, UT. He said "Creating thoughtfully placed trails have enhanced the publics opportunity to enjoy these lands in meaningful and minimally impacting ways. For example, the Southview trail system south of Cedar City provides many miles of single-track biking trails in a pinyon-juniper woodland that otherwise provided little recreational opportunities. At the same time, these trails caused minimal ecosystem disturbance as they required a negligible amount of tree cutting and loss of soil productivity to generate a popular yet relatively quiet, use by both bikers and hikers alike. The local community perception of these trails has been largely positive as evidenced by their involvement in not only helping build the trails but also maintaining them." I feel mountain bike trails are great because they are single track that blend in and are not as disruptive to the landscape as 2 track roads (many mountain bike trails are unseen and unknown without the help from MTB Project and Alltrails app). They can utilize areas that are otherwise not being used have minimal disturbance. Providing a trail would keep people on the trail instead of making their own. The mountain biking locals and tourists are here, but they just don't have many places to ride. So, if my two cents are worth anything, I would like to support and encourage the current and future use of mountain biking in the GSENM.	Dear GSENM RMP Project Manager.docx
Veranth	John	N/A	Recreation use and visitor services	Population growth must be acknowledged in the planning process. Utah and the world are growing rapidly and the monument will see increasing visitation by local residents, people from the Wasatch Front, United States visitors, and international visitors.	Veranth Scoping 926.pdf
Carroll	Lynn	N/A	Recreation use and visitor services	Special Recreation Permits and group size limits should be used to protect the landscape. By limiting growth of recreation use and facilities to areas that are already developed, further harm to wildlife habitats and monument values can be minimized.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Lish	Christopher	N/A	Recreation use and visitor services	The agency should focus any growth and expansion of recreation use and facilities in frontcountry	220926_doi-blm-ut-p010-2022-0006-rmp-eis_grand_staircase-escalante.pdf
Jorgensen	Helene	N/A	Recreation use and visitor services	The BLM needs to build more bathrooms facilities and better maintain bathrooms at parking areas and popular sights in the National Monument.	N/A
Stacey	Craig	N/A	Recreation use and visitor services	The monument was created to protect, conserve, and preserve the resources of this wonderful land. Don't yield to the forces of Industrialized/Commercialized tourism. Numbers need to be controlled.	l45l.jpg
WARD	EVERETT	N/A	Recreation use and visitor services	The Monument was originally designated to protect geologic, ecosystem, visual, historic, paleontological, and cultural resources and was not designated as a recreation-focused Monument. The promotion and expansion of recreation at the expense of the resources and values the BLM is obligated to protect should not happen. I encourage BLM to take a proactive and planned approach to managing recreation and not just respond to pressures as they happen or they will quickly be overrun by the ATV enthusiasts	N/A
J	A	N/A	Recreation use and visitor services	The original plan dictated any development would only occur outside of the monument in gateway communities - which not only protects water resources and visitor experience, but supports economic development vital to community sustainability. Aside from a pit toilet here and there and minimal features at popular rec sites to discourage excessive impacts, there should be no new development in GSENM.	GSENM_20220923.pdf
Cox	Steven	N/A	Recreation use and visitor services	Tourism within the monument has increased sharply. Better access to the GSENM attracts additional visitors and increases economic benefit to gateway communities. Additional restrooms need to be provided.	Comments on the Management Plan for the Grand Staircase Escalante National Monument.docx
Weaver	Brad	N/A	Recreation use and visitor services	Trash collection points should be constructed at all entrances to the GSENM. Visitors should be strongly encouraged to carry all trash out for deposit at these collection points.	GSENM Scoping Comments.pdf
Berry	Scott	N/A	Recreation use and visitor services	Using the best available high quality science determine and specify the operational visitation carrying capacity for the ecounits of GSENM designed to ensure minimizing detrimental visitor caused impacts to the ROV's present at GSENM. The sideboards for the visitor experience at GSENM must be protection and conservation of the ROV's present therein.	RAD Management (2).pdf
Sjogren	Morgan	N/A	Recreation use and visitor services	Whenever I encounter larger groups of hikers/backpackers the increased impacts are immediately obvious: vegetation becomes trampled in riparian areas, campsites become more lived in, any steps off trail begin to form new social trails/impact biocrusts. Likewise, large groups of people at front country areas bottleneck already popular and congested areas.	40 Mile Gulch _ June 2018.pdf
Downing	Dee	N/A	Recreation use and visitor services	Big groups: No longer let large groups string together the maximum party county and permit on the same day. I was camping at the bend across from Jacob Hamblin arch a few years ago and down canyon a girl scout troop of 30 people were camped. In the middle of the night, they started a rockslide under the arch. Also, the impact of that many people moving through the canyon is too high. The person permitting them must have known the 3 permits was one big group. They had 3 men "leading" the women troop leaders with all the young girls who didn't have a clue about desert safety and light backcountry impact.	N/A
Hartman	Bob	N/A	Recreation use and visitor services	Recreational use on the monument should have the same permitting requirements as the adjoining Glen Canyon National Recreation Area. Groups should be limited to no more than ten individuals. Commercial guides need to have a ratio of nine to one. No commercial permittee should have more than twenty paying guests at any one time.	N/A
Nielsen(I do not want offers)	Delena (please do not share)	N/A	Recreation use and visitor services	A few years ago I was canyoneering in escalante and someone had defaced some petroglyphs. I'm still angry about it. I've done hackberry canyon backpacking numerous times and one time some ATV person had scraped up the creek bed black in clearly untouched rock. I'm still angry about it. To me there is only one way to protect fragile landscapes and allow access and that is to limit it to a reserved access only, where visitors each and everyone has to do leave no trace tests. Charging fees limits the lame from desecrating. You cannot allow mass number of visitors into escalante. Too many people would just ruin its fragile nature.	N/A
Vildzius	Matthew	N/A	Recreation use and visitor services	Also consider a forest service style motor vehicle use map that allows dispersed camping in some areas and prohibits it in other areas as appropriate. For more sensitive areas, consider making them day-use only, or implementing a permit system to limit the number of visitors. You also need education and enforcement to keep people on existing trails and roads.	N/A
Vildzius	Matthew	N/A	Recreation use and visitor services	I enjoy visiting the GSENM area, and I think you should balance recreation and conservation. The number of people visiting public land has grown in recent years, and you should find a way to let people visit and enjoy this beautiful area while limiting impacts. For example, you should develop primitive campgrounds in places like hole-in-the-rock road so there isn't so much need for dispersed camping (which has dispersed impacts). And build sustainable hiking trails so people don't form their own by wandering through the desert.	N/A
Chalfant	Brad	N/A	Recreation use and visitor services	While motorized recreation is inevitable, recreational access should prioritize non-motorized usage as a means to limit impacts and protect core wildlife areas, culturally sensitive sites and in fact, the ecological function of the landscape. To appropriately manage recreation, it's critical that management agencies establish detailed current ecological data to establish a baseline in order to gauge ecological impacts. Where recreation, whether motorized or non-motorized, demonstrates or is likely to produce significant impacts to sensitive resources, managing agencies must be prepared to adequately restrict and/or reduce recreation in order to mitigate those impacts. Recreation on the GSENM can provide significant economic benefit to adjacent communities, but must not be allowed to compromise the ecological health of the monument or the protection of cultural or scientific resources within the monument.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Recreation use and visitor services	Recreation Use and Visitor Services: Recreational activities have the potential to impact tribal resources through vandalism, looting, trampling, erosion, and social trailing. ORV/OHV use can be particularly damaging and are known to increase impacts to cultural resources exponentially when compared to hikers, backpackers, or other visitors. The RMP must consider the impacts of recreation, not just impacts to recreation from management activities.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Recreation use and visitor services	Table 5-1i7 Missing from the table is the cost and fee amount of the 142 permits issued.	N/A



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Jackson	Thomas and Marilyn	Star Ranch LLC	Recreation use and visitor services	Electrical charging stations, cell towers and Wi-Fi along well-travelled, advertised, corridors should be built and routinely maintained. Modern Recreationalists depend on PCs to guide drones and keep in touch with members of their families and friends, as well as emergency services. Adequate connections should be installed and maintained for the recreational tourists who are the focus of this decision. Airplane tracking stations may be necessary when more drones and private planes become more frequent. With CAD, this not only assists County law enforcement, but also aids tourists and recreationists who have been lured in with GPS and BT.	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Recreation use and visitor services	The GSENM consists of 1.87 million acres of public land. Within the DWR Southern Region the majority of wildlife recreation, such as hunting and fishing, occurs on public land. This type of recreation is an important heritage to the citizens of Utah and a major contributor to the local economy.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Recreation use and visitor services	While the State will not devote as much of this letter to recreation as it did to grazing, the importance of outdoor recreation on the local economies of Kane and Garfield Counties cannot be overstated.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Goreham	Dennis	Wasatch Mountain Club	Recreation use and visitor services	As more visitors discover the Monument, garbage must be addressed. The current practice of carrying out everything you bring in works well. We suggest that dumpsters be placed at various access points to the Monument however. The practice of Leave No Trace will continue to work for many visitors but the BIM should make it easy for all users.	N/A
Goreham	Dennis	Wasatch Mountain Club	Recreation use and visitor services	As more visitors discover the Monument, garbage must be addressed. The current practice of carrying out everything you bring in works well. We suggest that dumpsters be placed at various access points to the Monument however. The practice of Leave No Trace will continue to work for many visitors but the BLM should make it easy for all users.	GSENM WMC comment 09182022.doc
Goreham	Dennis	Wasatch Mountain Club	Recreation use and visitor services	Camping: The current situation is not sustainable in the long run. During midweek and non-peak weekend periods there are few problems at present. However, there are popular times where campers are overwhelming the existing sites. Traffic in an around these areas becomes a safety issue. Noise, lights, and too many people can cause conflicts. As areas require further development, plans should include making some camping areas generator free. Some popular camp sites may require reservations at some point soon. Some areas, could accommodate more camping than is in current use and should be developed and encouraged. There should be more designated dispersed camping areas especially at already disturbed sites. Backcountry campsites should be better managed and concentrated in already disturbed sites along popular backpacking routes. No new undeveloped informal sites should be allowed to be created by users. This should be a planned and managed activity.	N/A
Goreham	Dennis	Wasatch Mountain Club	Recreation use and visitor services	Permanent toilets should be constructed at heavily used common areas and temporary porta-potties should be placed in high-use areas during peak visitor periods.	GSENM WMC comment 09182022.doc
Goreham	Dennis	Wasatch Mountain Club	Recreation use and visitor services	Visitor Capacity: The RMP and EIS must address how much sustainable activity the Monument can reasonably accommodate. Some areas and some uses may already be at full capacity. Others have room for growth. This must be determined now and plans developed accordingly. This Monument, and public lands in general, should be accessible to all users and this RMP should do nothing to discourage equitable use, just manage it. We encourage the BLM to develop an approach that concentrates visitor use in easily accessible and front country areas and protects backcountry areas throughout the Monument. That probably means the development of some new destinations, viewpoints and short trails in the front country areas near existing roads. This will meet the needs of many first-time and one-time visitors. The plan must address this now and develop a Visitor Use Management Plan as part of the process. The BLM should not be afraid to set limits in some areas if and when the time comes.	GSENM WMC comment 09182022.doc
Woerner	Chad	Wichita 4x4 club	Recreation use and visitor services	I travel from Kansas to Utah every year do trails that is allot of tourism dollars- Ihave a club that goes there as well- about 10-20 different families that go just for the trails. If there are no trails for four wheeling then we will go someplace else.	N/A
Pollock	Leland	Garfield County Commission	Recreation use and visitor services	In the last few years, recreation has increased significantly across the County. We encourage the monument to develop appropriate facilities to manage these activities. Establishment of fee sites shall be avoided whenever possible. Fee sites shall only be established when they are a) necessary to maintain developed sites and amenities and b) approved by the County Commission.	Garfield County Commission.pdf
Griffin	Simone	BlueRibbon Coalition	Travel, transportation, and access management	Inchworm Arch Road, for instance, can no longer be used for commercial, organized rides. Dispersed Camping Access Alliance also has the potential to be hindered. This project is being steadily undermined by the restrictions already imposed by the Monument, and could be more undermined by potential restrictions -trail closures, land-use rules, off-roading limitations, and hardened primitive sites. Our members' ability to experience dispersed camping is in jeopardy.	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Travel, transportation, and access management	As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and nonmotorized recreation use often overlap as OHV's often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc.	GSENM Resource Management Plan Scoping.docx-2.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Travel, transportation, and access management	.The agency should adequately recognize the issue associated with the statistic that a motorized route closed by the agency has never been re-opened even when needs and conditions have changed.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Travel, transportation, and access management	The agency should adequately consider that by assigning equal impacts to single-track motorcycle/e-bike trails versus ATV trails versus gravel roads versus highways that the road density criteria is flawed and should not be used.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Travel, transportation, and access management	The agency should adequately consider that the continual closure of motorized access and motorized recreation on lands managed demonstrates the intent to eliminate motorized access and motorized recreation without adequately disclosure of that intent.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Travel, transportation, and access management	The agency should adequately disclose the miles of existing trails closed to OHV use.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Travel, transportation, and access management	The agency should adequately recognize that motorized recreationists are the only ones to lose opportunities in this planning action and every other planning action and the justice issues associated with that trend.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Travel, transportation, and access management	The lack of high-quality motorized trails including motorized singletrack in the project area are significant issues. The closing of any motorized routes or the conversion to non-motorized is contrary to the needs of the public and is a significant issue.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Murray	Michael B.	Coalition to Protect America's National Parks	Travel, transportation, and access management	OHV use diminishes the natural soundscape, generates emissions from both vehicle exhaust and the generation of increased particulates in the air (dust), can result in direct injury and/or mortality of big game species through collision, and can have direct and indirect adverse impacts on biological soil crusts, vegetation and water resources (especially surface-disturbing illegal off-road trespass).	NPCA & Coalition GSE RMP scoping FINAL.pdf
Murray	Michael B.	Coalition to Protect America's National Parks	Travel, transportation, and access management	Therefore, we continue to urge the BLM to consider appropriate levels of OHV use both within the GSENM and adjacent to national park units, particularly roads that cross jurisdictions or are near park boundaries. We have significant concerns about increased pressure on our public land managers to expand OHV use, particularly nearer to our national parks. With literally thousands of miles of designated OHV routes, we maintain that allowing for increased use within and adjacent to protected landscapes risks resource damage.	NPCA & Coalition GSE RMP scoping FINAL.pdf
Popejoy	Mike	Grand Canyon Trust	Travel, transportation, and access management	As part of comprehensive travel management planning, BLM must produce route maps to illustrate a base travel network, to generate various route designation proposals, and for purposes of receiving public comments. In these contexts, it is vital that the Agency clearly mark on all maps or proposed maps areas with existing restrictions on motorized use, such as wilderness areas, WSAs, primitive non-motorized designations and ACECs - and, in this case, the Proclamation requirement that motorized use be restricted to designated roads. Depicting existing restrictions will ensure that public comments are informed by the knowledge that off-road motorized travel will not be permitted in the Monument and that additional designated routes should be extremely limited. Further, maps should indicate resources that could be affected by motorized use, such as wilderness characteristics and wildlife habitat. Public comments will then be informed by the potential resource conflicts and the best opportunities for designating areas for non-motorized recreation.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Travel, transportation, and access management	In the immediacy, as part of the current plan revision process, BLM should close two new open motorized routes that were designated as "open" in the 2020 Monument Management Plan: routes referred to as "The V-Road" and "Inchworm Arch Road," as well as an OHV Open Area also designated in the 2020 MMP known as the "Little Desert OHV Area." These recent motorized designations contravene the Agency's obligation to minimize impacts from OHV area and route designations, and do not conform to BLM policy for monuments and conservation areas which states that roads should be limited to the minimum network necessary for management. The new motorized routes and open area have multiple conflicts with Monument objects and values, including cultural sites, <sup>71</sup> and should be closed immediately to prevent further impairment. <sup>71</sup> See TWVS et al. Protest, GSENM and KEPA FEIS and Proposed Management Plans (Sept. 23, 2019).	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Travel, transportation, and access management	As discussed previously in these comments, national monuments are held to a higher standard of protection as units of the National Conservation Lands. Proclamation No. 6920 identifies a wide range of resources and values to be protected as Monument objects, including cultural, archaeological, geologic, ecological, historical, and scientific resources. Proclamation 10286, restoring the original boundaries of the Monument, does the same. These values can be adversely affected by motorized and mechanized travel. BLM should limit these uses within the Monument to protect the aforementioned resources and provide opportunities for quiet, backcountry recreation experiences.	Appendix C - ACECs.pdf
Shu	Lyn	Highway 84 LLC	Travel, transportation, and access management	Our freight company is often called a 'product relocation distribution specialist,' as we transport oversize machinery, over-long windmill blades and telephone poles. We didn't see any place in the Analysis for accommodating large equipment, which aids in road repair, flood control, or re-seeding, and clean wind-generated electrical power.	N/A
Todd	Robin	Maryland Ornithological Society	Travel, transportation, and access management	Off-road Vehicles: Off-road vehicles should be restricted to routes already designated for their use. No "free play" areas for ORVs should be designated, as they destroy wildlife habitat and leave longlasting scars on the landscape. The plan should establish a process for reviewing existing ORV routes and identifying any that are creating impacts against bird and wildlife habitat, cultural sites, or fossil sites. Such impacts are problematic especially where ORVs travel in riparian habitat, where vehicles cross streams or washes, or where they travel along a streambed. Any such routes should be closed and rehabilitated to restore the damaged habitat.	MOSltrr_GrandStaircaseScopingSep2022.pdf
Rubin	David	N/A	Travel, transportation, and access management	Our property is located 1 mile from Hole in the Rock Road. On December 4, 2017, President Trump's proclamation purportedly removed this road and land surrounding it from the Monument, and two days later U.S. Representative Stewart introduced to Congress the "Grand Staircase Escalante Enhancement Act," which would transfer Hole-in-the-Rock-Road to the State of Utah. The Salt Lake Tribune wrote on December 23, 2017 that Garfield County had funds to improve the road, but that paving was prohibited in the Monument. The Utah State Legislature instructed the State Parks manager to look into developing a heritage park near the Road, and the State Parks Director said they are "absolutely, 100% committed to making something fantastic happen at Hole in the Rock." Thus, in 2017, Garfield County had funds for road improvements, the State of Utah legislature and Parks Department were investigating plans for a park accessible from Hole in the Rock Road, President Trump's proclamation removed this route from the Monument (thereby removing the main obstacle to paving), and Utah Representative Stewart introduced a bill in Congress to transfer the Road to the State of Utah. Taken together, these events suggest that removing Monument protection was part of a plan for road construction and/or state park development. In particular, I suspect that paving Hole in the Rock Road is the ultimate goal of all this activity, because that is the action that was disallowed when the Road was in the Monument.	2017 Rubin et al Geology.pdf
John	Brandi	N/A	Travel, transportation, and access management	I am opposed to any closure and reclamation of routes. Those routes exist because there is a purpose and need for them and a history of use. Many of the routes throughout the monument were created by long time settlers, ranchers and farmers and the history and cultural importance should be recognized. Any environmental damage identified due to routes should be first addressed with management solutions such as re-routing, signage, and education materials. Closure is not management. Through different management strategies and proper education, negative impacts can be properly mitigated without closures. I believe the Little Desert OHV open area, the V-Road and Inchworm Arch Road need to stay open to public use. They have a purpose and need as well as a strong history of use.	N/A
Marienfeld	Joyce	N/A	Travel, transportation, and access management	Please do not allow in the plan, additional future roads. I have personally seen numerous times how this routinely encourages an exaggerated form of 'dispersed camping' (driving/camping anywhere/everywhere to find the 'right' spot) by recreating enthusiasts who mean no harm, I am certain, however, continue to permanently destroy areas - adding human feces, litter, lights (in designated 'dark skies' areas) and motorized noise, which, unfortunately, stretches for miles, destroying one of the most precious qualities of this monument... quiet.	N/A
Escalante resident	Not Provided	N/A	Travel, transportation, and access management	The BLM should consider how to manage the impact of commercial helicopter landing in GSENM. I have seen a helicopter land in the Vee near what is variously called the Cosmic Ashtray, the Volcano, etc. If helicopter tours begin to land clients near Monument features that require hiking and route-finding skills it will destroy the experience of discovery and solitude.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Not Provided	Not Provided	N/A	Travel, transportation, and access management	- Aircraft noise is insignificant, temporary and transient in nature, as an aircraft transitions the airspace. Any noise during take-off or landing occurs during a 30-second period. Research suggests that noise from small aircraft is not an environmental issue and may be more of a societal issue with only a small percentage of recreationists.	N/A
Not Provided	Not Provided	N/A	Travel, transportation, and access management	- Airstrips are situated on natural flat land features, such as open meadows or valleys, with little occurrence of soil disturbance or erosion.	N/A
Not Provided	Not Provided	N/A	Travel, transportation, and access management	- Airstrips can provide vital access to aid Search and Rescue, emergency response, and firefighting operations, as well as enabling BLM management of the GSENM.	N/A
Not Provided	Not Provided	N/A	Travel, transportation, and access management	- Aviation allows access for people to enjoy the backcountry and public lands that would not otherwise be able to do.	N/A
Not Provided	Not Provided	N/A	Travel, transportation, and access management	- Aviation leaves a very small footprint on the environment. An airstrip does not require a network of roads or trails to be able to access it or use it. An aircraft never goes “off trail” once it has landed and stays put until preparing for flight. Aircraft do not have powered wheels.	N/A
Not Provided	Not Provided	N/A	Travel, transportation, and access management	- Backcountry airstrips offer a certain measure of safety to pilots confronted with airplane mechanical issues or inclement weather.	N/A
Weppner	William	N/A	Travel, transportation, and access management	1.The entrance to the Calf Creek facility is located on one of the most dangerous curves on UT State Highway 12 between Boulder, UT and Escalante, UT. There is little signage warning of the entrance and poor design of the entrance allowing too much opportunity around the entrance for illegal parking and foot traffic. While Utah Department of Transportation is responsible for design and maintenance of Highway 12, the BLM decision to bring Wilderness designation up to the highway asphalt has complicated highway maintenance and redesign. Stopping or parking on that stretch of Highway 12 should be illegal and clear signage should be posted by the GSENM on both sides of the entrance. 2.The Calf Creek facility obviously has an inadequate parking lot. Not for the number of spaces available for tourists, but because it is inadequate for emergency vehicles. Dedicated space for emergency vehicles (ambulances and rescue vehicles) must be marked and reserved, with ample room for ingress and egress. There are federal and state guidelines that must be followed, and GSENM managements should meet with ALL local first responder organizations to get input and approval of the design. The proposed expansion of this recreation site will only bring more tourists, and potentially more incidents.	N/A
Murray	Danielle	N/A	Travel, transportation, and access management	b) Transportation and Roads- The management plan should implement a minimization criterion to designated roads and trails. This minimization criteria would aim to curtail irresponsible OHV use, prevent degradation to soil, air and water quality and protect threatened wildlife and sensitive cultural resources. It would also help balance forms of recreational uses, allowing the majority of users to enjoy an unimpaired natural landscape. Currently, over half of the national monument is less than 1 mile from a road AND the entire monument is less than 6 miles from a designated road. Due to the sensitive resources found throughout the original Grand Staircase, BLM should not designate or develop additional routes or roads within the planning area. The agency should assess the current road system throughout the monument based on the minimization criteria and close existing roads.	Scoping Comments GSENM- Conservation Lands Foundation.pdf
Trimble	Stephen	N/A	Travel, transportation, and access management	BLM must manage airstrips and landing locations as they would other motorized travel routes, and must not permit the establishment or use of airstrips or landing locations in Wilderness Study Areas and other wilderness-quality Monument lands.	GSE RMP comments 9-2022.pdf
Not Provided	Not Provided	N/A	Travel, transportation, and access management	I understand that aircraft are considered OHVs, in the same way as ATVs and motorbikes. There are a few important differences that I encourage the BLM to consider as the routes and limitations are developed for the travel portion of the GSENM RMP. I hope the following points will show that aircraft can be considered separately from other OHVs, or as a separate subset of OHV, rather than lumping all OHVs under the same limitations. - Aircraft do not require a network of roads and trails to access backcountry airstrips. The environmental impact of an airstrip is far less than a network of trails. - There are far fewer aviation users than other OHV users, also leading to less impact to the environment, objects and values in the GSENM. - There is much less noise from aircraft use of the backcountry, since aircraft take off, land, or transition the area much more quickly than other OHVs that are on trails. Likewise, aircraft are in more dispersed groups compared to OHVs travelling on trails. - Aircraft don’t go “off trail” once they have landed. - Airstrips are never located on steep hillsides, ravines, or other areas where tire tracks could result in soil erosion. Aircraft do not have powered wheels.	N/A
Veranth	John	N/A	Travel, transportation, and access management	Many popular destinations lack adequate parking leading to vehicle tracks in the vegetation along secondary roads and dangerous traffic conditions on Highway 12. The team who worked on scenic Highway 12 did a nice job with slow vehicle turnouts, but did nothing to address trailhead parking for popular, but informal trails. My advocacy fell on deaf ears then, so I will repeat it now. A prime example of dangerous conditions is the current parking on slickrock along Highway 12 where it crosses the upper arms of Phipps Wash. Examples of inadequate backroad parking at backcountry locations include the tiny parking area for highly popular Big Horn Wash, the confused parking situation for the Egypt canyons, and the lack of parking where North Fork of Silver Falls crosses the loop road. In reality only a few informal trails have adequate parking and in many cases this parking was the result of the county road crew initiative, and not the GSENM management plan.	Veranth Scoping 926.pdf
Beltran	Erin	N/A	Travel, transportation, and access management	One thing I surprisingly like about GSENM is that there is a paved road through it already for accessibility. Actually, there are two, including the one that was not supposed to get paved decades ago and does not proceed through Capitol Reef. I believe strongly in the right of all Americans, regardless of age or ability, to be able to enjoy our public landscapes. In my family alone, we are multi-abled over four generations and could not all access these types of landscapes without at least a few Monuments+ having a bit of scenic pavement. Better said, we would not all choose to access them altogether because we'd never leave out our family members with different needs. However, two such roads, and the two major unpaved roads with trailhead access, are enough already! Utah already has the Mighty 5 National Parks with their reliable balance of paved ADA accessibility to beautiful vistas and educational interpretation and opportunities with the natural world. Stop encouraging more motor vehicles, please, to cut up the land (poor cryptosoil! poor bunnies!) and landscape (excessive and visually scarring!) for high speed adrenaline kicks.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Veranth	John	N/A	Travel, transportation, and access management	Recommendations on Roads 1) I do not agree with "Administrative Roads" open to grazing permittees but closed to the public. A road should be either open to all or totally closed (except for possible emergency use). 2) The management plan should retain all existing agency-recognized roads.They exist on the ground and are being used for recreational access. 3)The Chimney Rock road provides important access to Coyote Gulch. 4) The Vee road is lightly used beyond the sand dunes which forms a natural barrier unless the county addresses the problem. Parking along the Vee road is problematic because of WSA boundaries, but the alternative is informal roadside parking. Parking should be designated at at least two points along the east side of Red Breaks, just before the sand dunes, at the logical start of the hike to the Cosmic Navel, and farther out near the end of the road where one can start hiking toward the sand dune route to the river. 5) Horse Canyon should be designated as open to the public down to the line shack. It makes no sense for the BLM to sign the road as being closed while the county is maintaining it. This road was cherry stemmed in the wilderness inventory because it has been used for decades. 6) The branch of the Sheffield / Spencer Flats road on the north side of Red Breaks should be open to the WSA boundary. The track exists on the ground. 7) The spur road from Highway 12 to the Death Hollow overlook and Micro Death Hollow trailhead should be kept open as an important recreational access. Likewise the road branch west along the power line which continues to an Escalante River overlook should be kept open. 8) The north and south roads up onto Fiftymile Bench should be kept open for recreational access.	Veranth Scoping 926.pdf
Veranth	John	N/A	Travel, transportation, and access management	The existing on-the-ground road network needs to be explicitly addressed as part both recreation and resource management. Roads are a contentious issue, but cannot be ignored.	Veranth Scoping 926.pdf
Johns	Keith	N/A	Travel, transportation, and access management	These airstrips are situated on natural flat land features, such as level, open meadows with little occurrence of soil disturbance or erosion. Aviation has a very small environmental footprint, the lightest footprint form of access to these lands. Airstrips do not have driving wheels and once landed, do not go "off trail." They transcend the need for roads and offer widely dispersed recreation activities. Noise from aircraft is transient and of short duration. Peer-reviewed research substantiates that small aircraft noise has no detrimental impact on wildlife. Aviators are non-motorized recreationists, participating in hiking, camping and other low-impact activities. These airstrips also provide vital access to aid Search and Rescue, emergency response, and firefighting, and offer possible life-saving options when small aircraft encounter mechanical problems or deteriorating weather conditions while flying over the relatively hostile terrain in southern Utah. Backcountry airstrips offer recreational access to the disabled and those with limited mobility and without the need for strenuous physical activity to enjoy our public lands. Lastly, they also offer a positive economic impact, with aviation fuel sales, food and lodging, sale of provisions and supplies, and other tourist-related support for the surrounding communities.	N/A
Holtry	Rita	N/A	Travel, transportation, and access management	We own property in Kenab so we enjoy riding our side by side on the mnay trails in the area including the GSENM. We use the trails and appreciate the Utah and Arizona trail riding group development. We belong to the Northern Utah ATV riding group and we support club rules out of respect for the land, staying on the trails packing out any refuse. I am 75 years old and cannot hike as much as I used to. This is the way I can enjoy the beautiful nature and there is so much of it here-	N/A
Plummer	Richard	N/A	Travel, transportation, and access management	While the plan should recognize long-used motorized travel routes, providing governance for their maintenance, advancing motorized recreational travel should not be a principal management goal. The BLM should consider limits, even closure, of those routes where motorized travel can lead to harming monument objects	N/A
Lish	Christopher	N/A	Travel, transportation, and access management	With regard to travel management, off-road vehicle use should be allowed only on designated routes, and no additional routes should be designated in the planning area. All motorized travel routes within the planning area that were closed or limited under the 2000 monument management plan must continue to be managed pursuant to that plan. Motorized recreation can be very damaging to ecological resources and is hard to control, so the BLM must close routes that harm monument object that the proclamation was designed to protect, including paleontological sites and rare and diverse populations of plants and animals.	220926_doi-blm-ut-p010-2022-0006-rmp-eis_grand_staircase-escalante.pdf
Veranth	John	N/A	Travel, transportation, and access management	1)Have resource staff monitor where parking is actually occurring and then the planning should prioritize areas where improved parking would enhance public safety and minimize resource impacts. 2)The plan should call for signage to direct backcountry users to suitable parking spots. 3)The management plan should include a map markup of popular informal trails as a way to inventory parking needs	Veranth Scoping 926.pdf
Guenin	Mark	N/A	Travel, transportation, and access management	Aviation must be included in the RMP as an allowable use. These are not new or novel facilities, since most Utah backcountry airstrips have been in existence since the 1950s. In fact, these predate the 1964 Wilderness Act, so access and use of these airstrips should be retained. Contrary to what aviation-phobes would have you believe, aviation has a very small environmental footprint; the smallest footprint of all forms of access to these lands. Airplanes do not have driving wheels - they're free-wheeling. Once landed, aircraft do not go "off trail." Noise from aircraft is of short duration. Airstrips are always situated on natural flat land features. As a result, there's no soil disturbance or erosion. They provide: - Search and Rescue, emergency response, and firefighting with a place to operate. - Life-saving options when small aircraft encounter mechanical problems or deteriorating weather conditions while flying over the relatively hostile terrain in southern Utah. - An excellent resource to the administrative needs for supervising the lands. - Widely dispersed recreation activities. The noise from small aircraft has no detrimental impact on wildlife. Airstrips serve as trailheads - once they've landed, aviators are non-motorized outdoorsmen, participating in hiking, camping and other low-impact activities. Aviation fuel sales, food and lodging, sale of provisions and supplies, and other tourist-related support provides much-needed economic benefit for the surrounding communities. Such airstrips offer recreational access to the disabled and those with limited mobility and without the need for strenuous physical activity to enjoy our public lands.	GSENM RMP.EIS Comment Card_20220729.pdf
Berry	Scott	N/A	Travel, transportation, and access management	iii.ROW; Rights of Way. GSENM in its entirety should be designated as closed to permanent ROWs, subject only to a possible exception for ROWs demonstrated to be required for the provision or extension of public services in areas adjacent to gateway communities. Temporary ROWs, small in scale and time limited may be allowed on a case by case via the SRP application process.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Carroll	Lynn	N/A	Travel, transportation, and access management	In particular, off-highway vehicle (OHV) use is highly likely to be destructive to values that the monument is meant to protect. The BLM should close OHV routes that are causing harm to monument objects. Routes that were closed or limited under the 2000 management plans should remain so. No new routes should be opened unless they are in already built-up areas, and harm to protected objects and values can be ruled out.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Berry	Scott	N/A	Travel, transportation, and access management	iv.Public access-related ROW claims. A detailed assessment should be prepared describing the type of public access-related claims, and private access claims based on valid existing rights, presented to GSENM, along with an analysis of the legal authority for such claims. Regulations should then be developed outlining the ways of responding to specific types of claims. The BLM should prepare and distribute educational materials to the public clarifying that there is no general public right to access, and that each such claim must be evaluated for compliance with controlling law.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Veranth	John	N/A	Travel, transportation, and access management	Many spur roads in the GSENM are important for backcountry access. Closure of a two-mile spur adds four miles of walking and can change a day hike into a backpack if someone wants to reach a destination. Opening of a road changes use patterns. An excellent example is the Vee Road, which not only facilitates access to the "Cosmic Navel" but also has shortened many of my favorite hikes into Red Breaks.	Veranth Scoping 926.pdf
Sjogren	Morgan	N/A	Travel, transportation, and access management	Proclamation No. 6920 limits motorized travel in the Monument to designated roads, and mechanized use to designated roads and trails. Other BLM-managed national monuments limit motorized vehicles in the monument to street-licensed vehicles only to prevent illegal off-road use in the monument, and this would be very helpful to protect the monument objects within GSENM that are susceptible to impacts from illegal off-road driving. Areas where rare and endemic flora, biocrusts, or cultural sites are present near roadways should limit motorized access to protect monument objects. All motorized and bicycle traffic should be confined to roads. To reach my hiking destinations, I have become by default an avid driver of rugged dirt roads. I enjoy the adventure, experience, and the places that these drives take me. There are many roads in the monument, that allow unbelievable access. It is rare to see other vehicles on all but the most popular routes. New roads are altogether unnecessary in an area with this much access. The creation of such roads will damage and destroy fragile/rare endemic plants and biocrusts. Signage needs to be improved to show motorists where designated roads exist and areas that are closed. The monument should be extremely limited to aircrafts and drones. Both significantly impact natural soundscape (a monument object) and disrupt to harm wildlife. Take-off and landing only should only be allowed in front country airstrips. No flight tours over backcountry areas should be allowed within the monument. The only exception to this is emergency situations.	40 Mile Gulch _ 2 May 2020.pdf
Gorzalski	Christina	N/A	Travel, transportation, and access management	Resource Management- As a local user I and many others I know have found ourselves having to go further and further into the backcountry to find unspoiled areas. Peekaboo, Spooky and Zebra suffer from overuse and have been advertised without adequate education. Graffiti and the arrow signs due to one tragic incident have changed the character of the canyons completely. I was able to participate in the study on usage in different areas of the GSENM and am glad to hear the data is still being used. While there is no turning back on some of these sites, the difficulty of getting to others protects them from the same fate. I was told at the scoping meeting that Garfield County is using magnesium to help with road maintenance. I understand with the amount of traffic the costs are high but if the road is paved, inappropriate vehicles will be able to access side roads which they will not be able to drive. I do like the idea of gravel added to the base but no improvements after Carcass Wash were the road seriously degrades.	N/A
Friedman	Bob	N/A	Travel, transportation, and access management	The Escalante had a few areas where one could drive in and view a little history of the area. I felt this was appropriate as these spots were close to the Hole in the Rock Road & areas away from the road were undeveloped (ie more in their natural state). These areas, while very scenic, were preserved more for their archaeological, historical & geological values. Obviously hiking is a form of recreation, but this should be a very minor impact on the land versus other forms including ORV use, 4WD use, etc. These should NOT be allowed in the national monuments.	N/A
Dissel	Scott	N/A	Travel, transportation, and access management	Travel and recreation management should also protect the resource to the highest degree. If and when it is determined, using the latest and best available scientific information, or the most-informed assessment of Bureau of Land Management Recreation and Travel personnel, that a resource is in danger of overuse, damage, or other diminishment of the values it holds, I ask that you minimize such recreation and travel and prioritize the protection of the resource. This is especially true for motorized recreation which, in many cases, causes far more damage, and more lasting damage, than human-powered recreation.	Grand Staircase Escalante Management Plan comments 9.27.2022.pdf
Gorzalski	Christina	N/A	Travel, transportation, and access management	Upper Paria/ Hackberry- The Upper Paria River is not as well known by tourists but it is an amazing area as well as an area with many artifacts. We have seen OHV use right through the river course as well as in the upper reaches of Hackberry Canyon. In Deer Creek, off the main river course, cattle ran through the riparian area leaving waste and erosion everywhere. This area deserves much more protection then it currently has.	N/A
Jorgensen	Helene	N/A	Travel, transportation, and access management	Air pollution, noise pollution and light pollution associated OHVs are huge concerns. Motorized trails need to be managed to limit these negative effects. No new motorized trails should be designated in the GSENM.	N/A
Not Provided	Not Provided	N/A	Travel, transportation, and access management	Aircraft and pilots remain at the airstrip for camping, which is a widely dispersed form of camping. Once at the airstrip, pilots and passengers are non-motorized recreationists, participating in hiking, fishing, camping and other low-impact activities.	N/A
Spotts	Richard	N/A	Travel, transportation, and access management	BLM enforcement is non-existent or weak because once an illegal route is created it becomes a permissible "existing route" for other OHV users. Because of these chronic BLM route management and enforcement deficiencies, the most efficient and effective approach is to simply designate these more remote areas as "closed" under the new RMP. In more front country areas with already heavily used OHV routes, those could be designated as "limited" so that the subsequent TMP NEPA analysis could make more informed route designation decisions on a case-by-case basis.	Recreation Report_Sept 2021 .pdf
Spotts	Richard	N/A	Travel, transportation, and access management	BLM should also ignore Utah's RS 2477 route claims during this TMP process because they are merely claims and have no legal weight. Only a federal court may determine whether these RS 2477 claims have any merit.	Climate Change and Livestock Use on Public Lands 2022.pdf
J	A	N/A	Travel, transportation, and access management	Develop a rapid response team to deal with vehicle incursions. This can help nip bad behavior when it starts. This can be made up of volunteers and interns if need be (I'm happy to help).	GSENM_20220923.pdf
Berry	Scott	N/A	Travel, transportation, and access management	Develop and implement a continuing and permanent Travel and Access Management System (TAMS) that incorporates a continually updated travel and access management plan and a smartphone based GIS mapping application describing specific use areas and open routes of travel in various modalities in GSENM.(TAMS Application).	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Bechtold	Joseph	N/A	Travel, transportation, and access management	Historical airstrips provide a safer and less intrusive option than landing off airport. My aircraft has oversized low pressure tires and leaves barely a trace on the strip. I look forward to accessing these areas for hiking without a land vehicle which would disturb the environment far more than my airplane.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Miles	Abby	N/A	Travel, transportation, and access management	I know that travel management has been an important issue. Tied to both of my previous points, the impacts of travel should be taken into consideration during the planning process. Motorized vehicles, aerial vehicles, agricultural vehicles, mountain bikes, and so many other forms of transportation/recreation can have significant impacts on the land's natural state. Planning needs to take these travel impacts into consideration and work to ensure that recreational travel, ATVs, and chaining don't destroy the geologic significance of these incredible public lands. Wilderness Study Areas are capable of providing some of that protection as well as deliberate limited route planning.	N/A
Clark	Edward	N/A	Travel, transportation, and access management	I would like to address an often overlooked method of acces, the use of legacy, remote airstrips as trailheads. We are used to trailheads that are accessed by wheeled motorized vehicles as jumping off points for all manner of recreational pursuits that you have already identified in the interim plan. As you know these points provide not only recreational access but management, maintenance, fire protection enforcement and emergency services access. Remote airstrips provide all of these options as well and frequently can do so at minimal cost for the agency. If identified as such they can even provide such access in areas you may eventually identify as proposed/designated wilderness. Existing remote Airstrips provide a means of backcountry access that does not require high impact road construction and maintenance. They are low impact and serve to further diversify access both in type of vehicle and those who use them. As a recently disabled outdoorsman I appreciate now more than ever the fact that flying in to a remote area gives me access to that area for some of my favorite things that I could not do so well arriving by car and having to hike in. There are existing examples of such uses throughout various federal and state lands in the U.S. Many times these strips are maintained through public/private partnerships at little or no cost to the managing agency. I have found that such places have very little environmental impact going forward due to their having been sited there previously oftentimes as a result of legacy mining or agricultural operations. Additionally, since fixed wing and some rotary aircraft need a relatively flat unobstructed surface for landing/takeoff, they are not prone to significant erosion, particularly when maintained. The use of such sites by pilots would be low impact both in numbers, noise and visual aspects and can be easily managed through a reservation system.	Grand Staircase-Escalante NM Comments.docx
Berry	Scott	N/A	Travel, transportation, and access management	Limit all motor vehicle access, including OHV / UHV use, to open routes specified in the TAMS. Discontinue the public use of the "open to administrative use" route category. Agency staffshould have access to agency products identifying routes that can be used by staff.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Weaver	Brad	N/A	Travel, transportation, and access management	Motorized travel routes inside the GSENM should be exhaustively identified and managed to preserve and protect resources for which the GSENM was established. Motorized cross country travel outside of identified routes should, of course, be prohibited and violations of this prohibition should be prosecuted.	GSENM Scoping Comments.pdf
Davis	Emily	N/A	Travel, transportation, and access management	Motorized vehicles should be limited to staff and emergencies. Motorized vehicles disturb the monument soundscape, wildlife and human visitors. They also damage habitat and biological soil crust. Preserving soil crust is particularly important, since once destroyed, loose dry soil can blow onto snowpack causing it to melt more quickly.	N/A
Mabbutt	Ben	N/A	Travel, transportation, and access management	My name is Ben Mabbutt. I live in Riverton Utah. I am building my own aircraft and I have been planning, now that I have retired of using my own airplane to visit all usable landing strips in Utah and also surrounding states that I can fly my plane into. I hope that we won't lose any of our existing landing strips. No matter what condition there in or even how often there used. Once lost their gone. Back country landing strips will have the least impact amount of impact on the area around the strip. ATVs cause way more damage to the country than any other vehicle. I know, I also have one. I ride responsibly on it but it still causes problems.	N/A
Weaver	Brad	N/A	Travel, transportation, and access management	No new motorized travel routes should be constructed unless the main purpose of construction is to preserve GSENM resources. Existing motorized routes should be maintained and repaired as needed to provide ongoing public access to known points of public interest, trailheads for further non-motorized travel, overlooks and known geologic features of interest to the public. Directional signs should be constructed and maintained at road intersections to prevent unintentional travel by visitors who have gotten lost while navigating to their intended destinations. GSENM planners should consider closure of routes that are unused or of little to no value for public access to GSENM resources (ie, "bad roads to nowhere").	GSENM Scoping Comments.pdf
Berry	Scott	N/A	Travel, transportation, and access management	Plan and initiate a public education campaign focusing on the communicating the message that travel in GSENM will be need to be consistent with the protection of GSENM ROV's, and that as visitation demands increase, there will inevitably be continuing changes in the TAMS to address growing visitation pressures. Planning should begin consideration of various potential components of the future TAMS options, including timed-entry systems, permit systems, fees, special use rules, etc.	RAD Management (2).pdf
Cox	Steven	N/A	Travel, transportation, and access management	Roads are an important means of accessing the GSENM. I am in favor of improving the Hole In The Rock Road at least to the Dry Fork area, maintaining the Burr Trail Road, maintain the V road and other roads to hiking trailheads.	Comments on the Management Plan for the Grand Staircase Escalante National Monument.docx
Jorgensen	Helene	N/A	Travel, transportation, and access management	The GSENM has seen a significant increase in the number of visitors over the last decade. Hiking trails have become increasingly crowded. The BLM needs to increase visitor access by building more non-motorized trails. Non-motorized trails have the least impact on the environment.	N/A
Clayson	Dirk	N/A	Travel, transportation, and access management	The travel management plan should include a options to increase the number of roads and trails. I think it is always unfair to start out with options ranging from one book end being keeping all existing roads and trails and the other end, being closing off a number of roads, which ends up resulting in picking a middle alternative which means closing off some of the existing roads by nature of the compromise. Every time there is a transportation management plan the middle ground results in closing off some of the roads. I feel the middle ground should be no change to the existing roads. So in order for this to be a reasonable middle ground, there must be options to add more roads. If we have options to close off 50 roads, we also need matching options to add 50 more roads. Anything else obviously shows extreme bias to closing roads, to manufacture roadless areas.	N/A
Rubin	David	N/A	Travel, transportation, and access management	Vehicular traffic- Regulations prohibiting offroad travel should be rigorously enforced, no new roads should be constructed, and Hole in the Rock Road should remain unimproved. Over the past decade, I have seen increasing numbers of OHV tracks in dry washes and "unofficial" roads appear where they don't belong. For example, the photo below shows an unofficial road traversing a fluidized sediment pipe, as has been observed by Mars rover, Curiosity, in Gale crater (pdf of that scientific paper is attached).	2017 Rubin et al Geology.pdf

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Rudow	Rich	N/A	Travel, transportation, and access management	We find increasing issues with degradation of the soundscape from growing vehicle and aircraft traffic in remote areas. Issues with graffiti in canyons are becoming more common, especially near road accessible locations. Issues with rope grooves and fixed anchors in the soft sandstone within technical canyons can be challenging in popular canyon destinations. In general, construction and improvements that make places more accessible will bring more management issues and degrade the wilderness setting. We encourage the BLM to be thoughtful about access improvements, especially near areas with deep wilderness values.	N/A
Anglin	Rob	N/A	Travel, transportation, and access management	Please consider general aviation within your resource management plan. The ability to visit small air strips in our little Cessna allows my family to access and enjoy the land with minimal impact. The small air strip serves as the camp ground and the trail head when camping and hiking. If there are businesses or restaurants nearby, we seem to always be in need of supplies, souvenirs, and meals which we purchase from these local businesses. Small air strips and general aviation allows my family the opportunity to enjoy our public lands while leaving no trace of our visit.	N/A
Bagley	Charles	N/A	Travel, transportation, and access management	I noticed that most complex questions were referred to you. So, I am writing you to get clarification of the status of backcountry airstrips in the 2022 National Aviation Plan. In the Plan I can find only two references to "airstrips." Neither reveals an actual plan. Section 5.27.5 "Backcountry Airstrip Operations" says only "Reserved."Why is that? If a plan exists I believe that the law requires that it be available to the public. Section 9.6 "BLM Owned/Operated Airstrips" references a "document" --"Recreational Aviation Foundation." [sic - not a document] I searched there, but was blocked from going to some pages. There was no clue about BLM policy. The RAF is a private 501(c)(3) public charity based in Montana. Their "Utah State" manager, Wendy Lessig, lives in Oregon (see cell #). How is it legal that the BLM delegates management of airstrips to a private foundation??	N/A
Crowther	Collin	N/A	Travel, transportation, and access management	The major difference is that airplanes have minimal impact on the natural environment when compared to trucks, ATV's, side-by-sides, motorcycles, and most other ways of enjoying these public lands, with the exception of bicycles and kayaks. If these more destructive methods of exploring are to still be allowed, then I believe one of the least impactful methods should not only be preserved but also encouraged.	N/A
Horn	Jack	N/A	Travel, transportation, and access management	As a senior and retired; wife and I can finally travel the USA in a timely fashion by flying our Cessna 182. We feel ALL BLM airstrips should remain open to public aviation for a whole list of reasons; but, for us it allows us to see more of our beautiful country. Please keep all of these strips open.	N/A
Larson	Dave	N/A	Travel, transportation, and access management	I strongly urge the BLM to include preserving airstrips in Environmental Impact Statement and Resource Management Plan for the Grand Staircase - Escalante National Monument. It is imperative to define each airstrip within the Grand Junction BLM district as unique and separate from current trails or roads as allowable use for aviation.	N/A
Martin	Lawrence	N/A	Travel, transportation, and access management	Make AVIATION an allowed and recognised use. Airplanes leave no foot print as do off road vehichles. Noise is not an issue in the back country. Emergency use has shown to be of value. Strips require little maintenace and provided pro bono by UBCP(Utah backcountry Pilots).Please keep these strips available to pilots.	N/A
McLaughlin	Jim	N/A	Travel, transportation, and access management	I urge the BLM to allow the continued use of backcountry airstrips in the RMP. The strips have multiple benefits as well as historical value. Most have been in use for about 70 years with minimal, if any, environmental impact. As a person with handicaps, I cannot walk the distances required to access these areas. Without these 9 airstrips, I would have no way to enjoy these remote areas. I believe the BLM should protect and maintain historical use of the airstrips and maintain the minimal impact access provided by the strips.	N/A
Not Provided	Not Provided	N/A	Travel, transportation, and access management	I believe that the back country airstrips should be maintained in order to allow for people to be able to enjoy the Utah landscape with minimal impact. These areas do not cause significant amount of damage to the wilderness area and have been active and then use since the 1950s. Please allow us to continue to maintain use of these access points for enjoyment of hiking and camping in southern Utah.	N/A
Not Provided	Not Provided	N/A	Travel, transportation, and access management	I live in Escalante and have witnessed first hand, the tendency for OHV users to travel off of existing roads (Smoky Mountain Road) and "explore" nooks and crannies. The impact of this form of travel should be considered in the new management plan. As our public lands experience increased visitation it's imperative that these places deserve more protection, not less and a budget that adequately provides for more enforcement of the rules already in place.	N/A
Not Provided	Not Provided	N/A	Travel, transportation, and access management	I would like to see aviation continue it's long time successful role in the GSENM area. These airstrips began as natural ideal long flat areas and were developed because they were easier, less expensive and less destructive than building roads to these locations. Even if roads are now available, some routes take hours to traverse instead of minutes by small aircraft further increasing safety and accessibility in these areas. Often times, disabled people are not able to travel a long rough trail for hours on end. However, they are able to more easily take scenic flights that perhaps include a stop and such airfields. In addition, scenic flights such as these have an increase in safety with emergency landing sights available such as these airfields. When small aircraft land after touch the ground for an estimated 1000 feet, the pilots and passengers in remote areas are then changed to foot traffic as opposed to additional motorized vehicles such as atvs, motor boats or jeeps.	N/A
Reed	Byron	N/A	Travel, transportation, and access management	I also believe that certain areas of this country should be left wild and not open to off-road vehicle use, which is extremely destructive in pristine wilderness areas. There are already enough places for people to drive off-road vehicles and ride motorcycles. At least some land just needs to be left wild for people to enjoy on foot.	N/A
Wright	Toni	N/A	Travel, transportation, and access management	I understand the BLM is considering closure of 9 backcountry airstrips in Utah. Not only would there be economic impact for the nearby communities, there is the problem of reduced access for search and rescue as well as emergency areas for distressed aircraft. The aircraft using these airstrips are low noise and very low impact. There can be no benefit to these closures	N/A
Crawford	James	N/A	Travel, transportation, and access management	Why would you not want to keep aviation airstrips open. The RAF (Recreation Aviation Foundation) and the UBP (Utah Backcountry Pilots) have a strong history of assistance in maintaining airstrips of this ilk. These airstrips provide recreational opportunities that are unique. I ask that your organization give full consideration to working with the RAF and the UBP on keeping these airstrips open to public use.	N/A
D	Pete	N/A	Travel, transportation, and access management	Aviation is an essential part of backcountry access both recreationally and for management of the lands as well as safety. It provides low impact access for search and rescue and dispersed use of the lands by the public. Most of the airstrips predate the wilderness act but well over 10 years. Organizations such as the RAF provide advocacy and help maintain those access points for low impact use of the land. Users participate in hiking and camping in a way lower impact way than for example 4x4s or other vehicles with driven wheels. Additionally, airstrips are typically built in areas that are already flat and do not have erosion issues.	N/A

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Hartman	Bob	N/A	Travel, transportation, and access management	There needs to be a study of the impacts of motorized vehicles on the monument. Only designated trails should permit any type of motorized (internal combustion or electric powered) vehicles. In addition human powered vehicles should be similarly restricted. Any vehicle operated on the monument should be required to pass an annual safety inspection. Operators must provide proof of liability insurance. Operating a vehicle without an annual safety inspection and liability insurance will result in a ban from the monument.	N/A
Kopriva	Michael	N/A	Travel, transportation, and access management	Please consider including aviation use of backcountry airstrips in your Resource Management Plan (RMP). Aviation has been the backbone of hard to reach areas of our great country for over a hundred years. I realize that not many people participate in aviation. However, aviation not only provides great enjoyment for those who do fly but also provides critical access for many reasons including search and rescue, wildlife management, emergency evacuation, and care of the wild.	N/A
Mazzola	Gregory	N/A	Travel, transportation, and access management	When developing the Grand Staircase - Escalante Resource Management Plan, the BLM should support low-impact usage of the parkland by General Aviation users. Small aircraft pilots have used airstrips in the Grand Staircase area since the 1950s to gain access to remote and pristine sections of the park. These aircraft have minimal impact to Grand Staircase, requiring only a thousand feet of dirt versus miles of paved road, and once landed the aircraft do not go "off trail".	N/A
Not Provided	I care about the GSENM	N/A	Travel, transportation, and access management	For example, the science correlates the density of a route network with the intensity of its effects. Higher route densities generally result in greater adverse impacts. This is especially true for sensitive wildlife species. This analysis should help inform RMP level decisions relating to transportation planning, such as which areas should be designated as limited or closed to OHV uses. There should be no open areas in a national monument.	N/A
Rathke	Thomas	N/A	Travel, transportation, and access management	In no uncertain terms should vehicular activity be allowed to be increased in the GSENM. There is far too much activity as it is and it interferes with the peacefulness of the open spaces. Where damage has occurred, roads need to be closed to vehicular traffic in order to protect the natural beauty and native plants and formations for future generations. Off-road vehicle activity must not be allowed to increase, but rather should be limited as much as possible. However, I'm not opposed to setting up areas with less valuable resources that can be designated specifically for off-road use to get that activity away from sensitive areas without eliminating that off-roading entirely.	N/A
Schell	Ronald	N/A	Travel, transportation, and access management	Finally, please significantly limit or prohibit aerial uses that destroy the natural solitude of GSENM that is becoming more and more rare and valuable.	N/A
Thomason	B.	N/A	Travel, transportation, and access management	I'm writing to encourage the inclusion of aviation and the use of back country airstrips in the EIS and RMP for Utah's Grand Staircase - Escalante National Monument. Aviation is one of the most environmentally friendly ways to visit the back country. Airplanes don't go "off-road." Any significant noise is of short duration and confined to an area near the airstrip. Back country airstrips are useful for safety and emergency evacuation purposes. Access by small airplane means fewer roads are needed. Back country flying is an increasingly popular activity and it is my hope it will be included and encouraged in this new plan.	N/A
waggoner	kristina	N/A	Travel, transportation, and access management	The BLM should manage and maintain the roads within the monument boundary, so conflicts don't arise between the county employees and the BLM. This would also ensure that only roads in the travel plan are maintained and that road closures are enforced. The BLM doesn't have trail crews and they should dedicate personal to maintaining the roads in place of trails. This would also put more BLM personal in the field where they belong.	N/A
White	Erin	N/A	Travel, transportation, and access management	There are a variety of benefits to having backcountry airfields open, maintained, and ready for use, including search and rescue, firefighting efforts and other emergency needs. Backcountry airfields also provide an opportunity for people with disabilities to fly to and enjoy the beauty of our public lands and remote areas without needing to embark on a hike or backpacking trip. Having worked with people with disabilities in the past as both a volunteer and as a professional (I previously served as Marketing Director for an outdoor recreation nonprofit for people with disabilities), accessibility is something I feel strongly about.	N/A
Corbato	Steve	Oregonians For Wild Utah	Travel, transportation, and access management	o BLM should not establish any "open" motorized travel areas within the Monument, and should limit all motorized travel to designated routes established in the 2000 travel management plan. BLM should also take the opportunity to close routes that are harming monument resources like soils, cultural sites, and natural soundscapes and viewsheds	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Travel, transportation, and access management	If it's really about opening up lands 'to the public,' what new roads are going to be available to access GSENM with services provided solely by GSENM and not dependent on the County or local communities?	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Travel, transportation, and access management	Table 5-18 Existing Travel Designations proves our point that this initiative is about closing access, rather than opening it. If only 100 sites are open, 1,863,700 are limited and 1,500 are closed. The goal of increasing recreational opportunities is erroneous.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Travel, transportation, and access management	Early government Rangers had Graders and Caterpillars to assist in maintaining mountain roads. This practice should be reinstated to insure adequate corridors through more than 60 miles of dirt roads. Most assuredly, the GSENM Government employees by mandate will be using EVs, too, to patrol the deserts and mountains and discharge their administrative responsibilities. Charging Stations should be planned for public use, not just government employees.	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Travel, transportation, and access management	This visitation increase has resulted in increased use of the road and significant damage to the base materials. This results in washboards, rutting, potholes, and sand pits, all of which make it unsafe for the volume of traffic utilizing the HITR Road. The County has documented motor vehicle damage, as well as livestock deaths from pulling trailers on the damaged road. As the base course degrades, potholes, ruts, and washboards appear, and visitors try to avoid the road damage by going around it. This results in widening of the road surface and disturbance beyond the normal travel surface. Along with increasing the disturbance area, the large number of vehicles traveling the HITR Road create major dust issues including plant damage, PM2.5 pollution, and reduced visibility. The County grades the road about 16 times/days per year. Each time the grader runs across the road, the surface of the road is dug a little deeper. There are locations where the HITR Road is more than two feet deeper than the adjacent lands, causing a channel for water and flooding to further damage the surface of the road.	GSENM RMP Scoping Comments 27SEPT2022.pdf



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Goreham	Dennis	Wasatch Mountain Club	Travel, transportation, and access management	Infrastructure: Roads should be maintained at least at current level with thought given to some minor improvements as needed for safety. All other roads should receive only minimal maintenance to repair washouts or other issues. The plan should consider if some "administrative roads" could be open for visitor access to some areas. More parking is needed at popular trailheads and principal areas to accommodate hikers, horse trailers, and 4WD users. Currently, when there is not enough capacity, people are parking on roadsides or nearby on previously undisturbed areas.	GSENM WMC comment 09182022.doc
Pollock	Leland	Garfield County Commissions	Travel, transportation, and access management	We are pleased that all alternatives within the AMS include language to maintain and improve primary and secondary routes to meet public health and safety needs. However, we were disappointed to hear at the recent cooperating agency meeting that any improvements would need to go through secondary analysis before being approved. With the current condition and use of many of our roads, this is unacceptable. We recommend that this RMP include the analysis for the immediate improvement of Hole-in-the-Rock (HITR) Road. As you may know, Garfield County has been discussing the maintenance and surfacing of the Hole-in- the-Rock Road for several years and we have constantly recommended chip sealing to create a thin pavement to reduce the wear on the road. We recommend completing this surface improvement on the first 12 miles of the road to the Garfield/Kane County line. Kane County may desire to continue the chip seal further to meet their needs. In considering paving the first 12 miles of Hole in the Rock Road, Garfield County set out traffic counters to assist in determining the need for pavement. These traffic counters provided data which assisted the County in determining the average daily traffic (ADT) for the summer season. The ADT is the volume of traffic passing a point of a road, in both directions, during a period of time. Garfield County's traffic counters were deployed a period of 147 days from 04/30/2021 to 09/23/2021 resulting in 87,444 counts. From this data, the resulting ADT is 594. Appendix D of Gravel Roads Maintenance and Design Manual (a publication sponsored by the Federal Highway Administration) states that consideration for paving can be justified from as low as 50 vehicles per day to upwards of 500. It also states that when traffic volumes reach 400 to 500, serious consideration should be given to some kind of paving. Other sources recommend paving at just over 200. This data, along with personal experience of the deterioration of this road due to traffic show that it is not only reasonable but necessary to begin paving this portion. Aside from the technical data, we have seen major safety and environmental issues associated with increased volumes of traffic. Specific safety issues include washboards, rutting, potholes, and sand pits, all of which make it unsafe for the volume of traffic utilizing the HITR Road. As travelers try to avoid these hazards, they also begin to impact the environment by attempting to create new routes. In the early months of 2022, in an attempt to improve travel safety, the County restored the first 5 miles of the HITR Road by re-enforcing the base materials, applying new gravel to the surface, and applying a dust control treatment. The cost of this work exceeded \$100,000 and consumed three (3) months of County Road crew time. The County hoped that the new gravel along with the dust treatment would stand up to ongoing traffic needs. However, after only a few short months, it was apparent that traffic numbers were too high, and the HITR Road continued to quickly degrade. It is estimated that any new gravel will only last into the next year. The County has reached a point where it can no longer economically maintain the HITR Road to appropriate safety standards with a gravel surface. To keep the road maintained at its current level, the County would have to continue to spend approximately \$17,000 dollars per mile per year. The County does not have those dollar resources. Additionally, there are economic losses to citizens who use the HITR Road in damage to their vehicles and livestock.	Garfield County Commission.pdf
Pollock	Leland	Garfield County Commissions	Travel, transportation, and access management	Drainage over the entirety of the road need to be addressed. Garfield County has received a grant from the State of Utah to address the drainage issue where Hole-in-the-Rock Road crosses Alvey Wash. This crossing consists of multiple large culverts which are rated low in the State's bridge management system and have been identified to be in need of replacement. Due to the current management plan, we have been unable to complete that funded project. Garfield County will share these plans and draft environmental assessment with the Monument to assist in including these improvements into this RMP. In conclusion, Garfield County supports alternatives which simultaneously manage resources for multiple use/sustain yield while enhancing and improving local socio-economic health and community stability. We believe the Monuments timeline for completing this RMS to be rushed. We request that coordination be carried out in a timely and meaningful fashion in order to best align the goals of all stakeholders but especially the local communities which will receive the greatest impact.	Garfield County Commission.pdf
Sjogren	Morgan	N/A	Special designations	In addition to currently designated Wilderness areas, zones should be designated for quiet non-motorized activities and less developed recreation experiences (primitive zone), and pristine zones where there are Wilderness characteristics and very sensitive ecological areas. These zones would be closed to motorized vehicles, and these areas would need to be accessed on foot.	40 Mile Gulch _ 2 May 2020.pdf
Lish	Christopher	N/A	Special designations	Please make Big Bowns Bench a research natural area. Big Bowns Bench is an important example of what healthy monument land looks like without grazing. It can serve as an important research area for scientists.	220926_doi-blm-ut-p010-2022-0006-rmp-eis_grand_staircase-escalante.pdf
Sutter	Eileen	N/A	Special designations	BLM needs to use its authority to designate WSA's with GSENM. Once designated, WSA's need to be managed for protect wilderness values, including dark sky landscapes and viewpoints.	Comments for 2022729 GSENM RMP FR Notice of Intenet 2022.docx
Goreham	Dennis	Wasatch Mountain Club	Special designations	Preservation: The entire Monument should be managed in a way to minimize further impacts. Sensitive and vital ecological and scientifically important areas within the Monument should be analyzed for special designations.	GSENM WMC comment 09182022.doc
Painter	Michael J.	Californians for Western Wilderness	Wilderness and wilderness study areas	BLM and Monument managers should also use their authority under §202 of the Federal Land Policy & Management Act (FLPMA) to designate new Wilderness Study Areas on all lands that qualify under the 1964 Wilderness Act—and then manage them appropriately for that classification. This is a most useful policy protection that has been sorely neglected by BLM nationwide, and re-establishing its usefulness would benefit not only GSENM, but also BLM lands across the United States by setting a useful precedent.	N/A
Action Committee	CTVA	Capital Trail Vehicle Association	Wilderness and wilderness study areas	.The agency should adequately consider that wilderness is not managed for beneficial use and health and to create more defacto wilderness only compounds the problem.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Wilderness and wilderness study areas	The agency should adequately consider that the acreage set aside for wilderness and wilderness study areas is significantly greater than the needs of less than 3% of the public.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Wilderness and wilderness study areas	BLM has the authority and obligation to inventory and protect wilderness-quality lands in land use planning processes such as this one. Under the Federal Land Policy and Management Act (FLPMA) section 201, the Interior Department is directed to maintain current inventories of the resources it manages-including areas that qualify for wilderness designation. Under section 202 of FLPMA, once such inventories have been completed, the Department can and should designate lands as WSAs to ensure their durable conservation management. Importantly, Wilderness Study Areas are designated administratively through land use planning processes subject to the National Environmental Policy Act (NEPA). These NEPA processes offer ample opportunities for public input, collaboration with local communities, and transparent decision-making. The Grand Staircase-Escalante National Monument management plan is one of these processes. In the past, the BLM has taken the policy position that it may no longer designate new Wilderness Study Areas. This position is contrary to the plain language of FLPMA sections 201, 202 and 603 and should be rejected. Nothing in the text of Section 603 limits BLM's authority under section 201 to undertake wilderness inventories on an ongoing basis, nor does it limit BLM's authority under section 202 to establish new WSAs. Every prior administration from 1976-2000 created WSAs under section 202124 and plainly had authority to do so. This administration has such authority as well, making this a reasonable alternative requiring consideration in this NEPA and monument management planning process. See, e.g., New Mexico ex rel. Richardson v. Bureau of Land Management, 565 F.3d 683, 712 n.34 (10th Cir.2009) (noting that BLM did not defend the Norton-Leavitt settlement and based on that silence the court stated "[w]e assume arguendo that wilderness study area designation under [section 202] is a lawful land management option."). 124 See generally Federal Land Management: Status and Uses of Wilderness Study Areas, General Accounting Office (Sept. 1993) (available online at <a href="https://www.gao.gov/products/rced-93-151">https://www.gao.gov/products/rced-93-151</a> ). See also See, e.g., Interim Management Policy and Guidelines for Land Under Wilderness Review, 44 Fed. Reg. 72,014, 72,015 n.1, 72,018 (Dec. 12, 1979); Sierra Club v. Watt 608 F. Supp. 305 (E.D. Cal. 1985); N.M. Natural History Inst., 78 I.B.L.A. 133, 135 (1983); Final Wilderness Inventory Decision, 58 Fed. Reg. 45,528 (Aug. 30, 1993) (establishing Scott's Basin § 202 WSA in Utah).	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Wilderness and wilderness study areas	The BLM should consider, analyze and ultimately designate new Wilderness Study Areas (WSAs) as a key tool for protecting wilderness-quality and undisturbed public lands through this collaborative land use planning process. Specifically, the Agency should consider designating BLM-identified lands with wilderness character as WSAs in every action alternative. Designating wilderness character lands as WSAs is wholly consistent with President Biden's 2021 Proclamation establishing the Monument.	Appendix B - RNA Proposals.pdf
WARD	EVERETT	N/A	Wilderness and wilderness study areas	BLM should protect lands that qualify as wilderness by designating them as new wilderness study areas.	N/A
Holmes	Jenny	N/A	Wilderness and wilderness study areas	The BLM should designate all lands with wilderness characteristics as new wilderness study areas. This would help address the continuing pressure to establish unneeded and harmful off road vehicle routes and protect threatened monument objects and allow of the experience of solitude that is becoming increasingly rarer in Red Rock county.	N/A
Sorenson	Craig	N/A	Wilderness and wilderness study areas	- Primitive zones should be designated and managed as wilderness study areas and recommended for wilderness, including state acquired lands within the primitive zones.	GSENM Management Plan Comments.pdf
Not Provided	Jaden	N/A	Wilderness and wilderness study areas	I. Designate all qualified wilderness areas as wilderness areas.	N/A
C	Peter	N/A	Wilderness and wilderness study areas	BLM must manage identified lands with wilderness characteristics for the protection, preservation, and maintenance of those wilderness values. Hence, BLM should protect lands that qualify as wilderness by designating them as new wilderness study areas.	N/A
Lish	Christopher	N/A	Wilderness and wilderness study areas	In its new plan, the BLM should protect lands that qualify as wilderness by designating them as new wilderness study areas.	220926_doi-blm-ut-p010-2022-0006-rmp-eis_grand_staircase-escalante.pdf
Orr	Nancy	N/A	Wilderness and wilderness study areas	Manage any WSAs as wilderness, so that they may eventually achieve wilderness designation.	N/A
Zimmerman	Cliff	N/A	Wilderness and wilderness study areas	The BLM should also protect lands that qualify as wilderness by designating them as new Wilderness Study Areas, using authority provided under §202 of the Federal Land Policy & Management Act (FLPMA) and then manage them appropriately for that classification.	N/A
Plummer	Richard	N/A	Wilderness and wilderness study areas	The lands are largely wild, and qualifying lands should be protected designating them as Wilderness Study Areas	N/A
Alderson	George and Frances	N/A	Wilderness and wilderness study areas	Wilderness characteristics: The new plan should protect the wilderness values of those areas identified as having wilderness characteristics as defined in sec. 2(c) of the Wilderness Act. They should be designated as wilderness study areas under the authority of sec. 201 and 202 of the Federal Land Policy and Management Act, which gives BLM a continuous mandate for inventory and planning. Those areas very likely should have become wilderness study areas in the 1980 wilderness inventory, but we know pressures from county officials may have led BLM field managers to delete them from wilderness study. Now is a good time for BLM to overcome that omission.	N/A
Friedman	Bob	N/A	Wilderness and wilderness study areas	Finally, restoration of Wilderness Study Areas that existed decades ago should be reinstated. While not all will eventually be wilderness areas, let's not encroach these areas to make that designation impossible.	N/A
J	A	N/A	Wilderness and wilderness study areas	I believe many people come to GSENM because it is so remote, so this plan should go to great lengths to preserve wilderness character in designated areas and beyond.	GSENM_20220923.docx
Not Provided	Not Provided	N/A	Wilderness and wilderness study areas	I recommend making as much of it as possible a Wilderness area.	N/A
Schwartz	Ephraim	N/A	Wilderness and wilderness study areas	Identify and protect wilderness areas that will preserve the original flora and fauna in the Monument.	GSENM comments.docx
Miles	Abby	N/A	Wilderness and wilderness study areas	n creating this management plan, the BLM does have an opportunity to ensure protection of these valuable lands for decades to come through Wilderness Study Areas. So much of the land within the monument has already been identified as having wilderness character. The BLM should consider recognizing the importance of wilderness protection and give these lands legally-enforced protection through designating them as Wilderness Study Areas.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Sharman	Mary	N/A	Wilderness and wilderness study areas	Please prioritize wilderness in the new Grand StaircaseEscalantemanagement plan. There are so many stunning places within the new boundaries. lve been coming to southern Utah for 40 years and there is no place lve seen that is more stunning and worthy of protection.	N/A
Anderson-Schwartz	Pat	N/A	Wilderness and wilderness study areas	Recognize and protect lands that qualify as wilderness by designating them NEW WILDERNESS STUDY AREAS.	BLM Comments.docx
Murray	Danielle	N/A	Wilderness and wilderness study areas	Sec. 202 Wilderness Study Areas- Sections 201 and 202 of FLPMA provide the authority for BLM to designate Wilderness Study Areas (WSAs). Section 201 requires the BLM to continually update and maintain its inventory of the public lands. Section 202 requires BLM to develop and update land-use plans, including designating WSAs and managing them under the non-impairment standard. This designation ensures wilderness character is maintained on public lands protecting the agency's wildest places, irreplaceable cultural resources, native species, and world-class recreation. To truly address the climate and biodiversity crisis and protect our water resources, the BLM must embrace and use this tool to protect our public lands. We encourage the BLM to inventory and consider designation of 202 WSA's during the planning process.	Scoping Comments GSENM- Conservation Lands Foundation.pdf
Weaver	Brad	N/A	Wilderness and wilderness study areas	Wilderness Study Areas inside the GSENM should be maintained and managed to protect their suitability for eventual wilderness designation by Congress. New Wilderness Study Areas should be identified, designated and managed in areas that are currently suitable for eventual wilderness designation by Congress.	GSENM Scoping Comments.pdf
J	A	N/A	Wilderness and wilderness study areas	WILDERNESS: I want to see a lot in this next plan about managing Wilderness and WSAs as wilderness. The perimeters of these areas are consistently at threat to OHVs and human traffic and I want to see consistent funding to sign and monitor these areas.	GSENM_20220923.docx
Corbato	Steve	Oregonians For Wild Utah	Wilderness and wilderness study areas	o BLM must manage identified lands with wilderness characteristics for the protection, preservation, and maintenance of those wilderness values.	N/A
Corbato	Steve	Oregonians For Wild Utah	Wilderness and wilderness study areas	o BLM should protect lands that qualify as wilderness by designating them as new Wilderness Study Areas (WSAs).	N/A
Feinberg	Jackie	The Pew Charitable Trusts	Wilderness and wilderness study areas	BLM has the authority and obligation to inventory and protect wilderness-quality lands in land use planning processes. Under FLPMA, the Department of the Interior is directed to maintain current inventories of the resources it manages-including areas that qualify for wilderness designation. Under section 202 of FLPMA, once such inventories have been completed, the Department can and should designate lands as WSAs to ensure their durable conservation management. We urge the BLM to consider the designation of new WSAs as part of the GSENM planning process, as WSAs are the agency's most durable and important administrative tool to maintain wilderness character on certain high value public lands. These wild and undisturbed landscapes provide important wildlife habitat, enhance species connectivity between other patches of lands, provide backcountry recreation experiences, and serve as climate refugia that help species adapt to changing climate and ecosystem conditions. These lands also sequester significant amounts of carbon, help conserve scarce water resources, and safeguard cultural landscapes and sites. Importantly, WSAs are designated administratively through land use planning processes, such as the GSENM process, that are subject to NEPA. These NEPA processes offer ample opportunities for public input, collaboration with local communities, and transparent decision-making. Through these collaborative opportunities for public engagement, sportsmen, ranchers, recreationists, and many other public land users have joined together to provide community-based feedback to federal land managers.	Pew Comments-GSENM Scoping-9-27-22.pdf
Campbell	Todd	University of Tampa	Wilderness and wilderness study areas	The GSENM also contains multiple Wilderness Study Areas (WSA) and Instant Study Areas (ISA). These areas are described as having wilderness characteristics, such as naturalness. Since these areas are supposed to be protected, they are home to many species. WSAs are becoming very popular for people who want to "experience nature". Due to the increased amount of recreation, WSAs and ISAs are at risk of becoming damaged, risking the habitat of the organisms in that area. Most of the damage done in these areas are due to improper off-highway vehicle (OHV) usage, illegal incursions, and graffiti.	N/A
Goreham	Dennis	Wasatch Mountain Club	Wilderness and wilderness study areas	The BLM must manage areas with wilderness characteristics for protection and preservation in a manner that would maintain nature, solitude, and other values.	GSENM WMC comment 09182022.doc
Popejoy	Mike	Grand Canyon Trust	ACECs	Goal 2 Promote and restore healthy riparian habitat throughout the Monument. Maintain and preserve aquatic connectivity through land acquisition and maintenance of instream flows and by removal of barriers where practicable.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	ACECs	Seaman's Wash-Petrified Hollow ACEC The Seaman's Wash proposed ACEC is 15 miles east of Kanab along Hwy 89. It encompasses almost 12,000 acres in the Seaman's Wash and Petrified Hollow Wash drainages and includes an unusual abundance of rare species. The soils are characterized by the highly erosive Chinle and Moenkopi Formations, including the gypsiferous Shnabkaib member. These unusual soils support unique assemblages of endemic gypsophila plants, including Kane breadroot (Pediomelum epipselum), Kanab thelypody (Thelypodopsis ambigua var. erecta), Atwood's pretty phacelia (Phacelia pulchella var. atwoodii), Kodachrome peppergrass (Lepidium montana var. stellae), and Meager camissonia (Camissonia exilis). An unusual diversity of biological soil crust species also relies on these soils, including the rare lichen Gypsoplaca macrophylla.125 This lichen is considered threatened in part due to its reliance on fragile gypsiferous soil crust.126 125 St. Clair, L. 2005. Lichen Communities of Selected Gypsiferous Sites in Big Gypsum Valley, San Miguel County, Colorado. 126 https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.123906/Gypsoplaca_macrophylla This ACEC would emphasize protection of the objects mentioned in the 2022 Proclamation including "unusual and diverse soils, including...biological soil crusts" and "diverse, rare, and endemic populations of plants". Archaeological artifacts are known from this area as well, along with petrified wood, which are both objects protected in the Monument Proclamation. The closest wilderness study areas are the Paria-Hackberry WSA about 18 miles to the northeast and the Moquith Mountain WSA 17 miles to the west. Surface-disturbing human activity including indiscriminate OHV use, grazing, and BLM vegetation treatments are the most important threats in this area to these unusual and delicate communities. A long history of these projects along Highway 89 has removed much of the habitat for these organisms in this area. Reserving a small part of it as an ACEC would provide more protection for the rare species and communities that remain and provide easily-accessible research and educational opportunities illustrating, among other things, biological soil crust communities and important gypsum soils. A nomination document is in Appendix C.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	ACECs	The following areas warrant designation as ACECs because of their relevance and importance because of a "significant historic, cultural, or scenic value; a fish or wildlife resource or other natural system or process; or natural hazard" (43 C.F.R. § 1610.7-2). They are described briefly below and in more detail in Appendix C, which, along with other appendices and references, was included in attachments sent to BLM via US Mail, certified. It should be noted that the BLM has established ACECs following and in addition to national monument designation, such as at Gold Butte National Monument.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	ACECs	Warm Creek ACEC The Warm Creek ACEC is located in the heart of the Kaiparowits Plateau, surrounded to the north and west by the Paradise/ Wahweap Wilderness Study Area, to the east by the Burning Hills Wilderness Study Area, and to the south by Glen Canyon National Recreation Area. The ACEC is defined by dramatic, expansive scenery, most notably the significant backdrop of the Straight Cliffs and Fiftymile Bench. The ACEC is the heart of the "fossil-rich formations in the Kaiparowits Plateau that demonstrate billions of years of geology infused with world-class paleontological sites" described in Proclamation 10286, and along with important paleontological resources, has significant cultural, geologic, scenic, ecological, and biological values. Among these are unmatched views of the area's unique geology, including deep, remote, and incised canyons intermixed with sweeping benches with vantage points that stretch seemingly forever, and ecologically and biologically significant populations of rare species, including federally-listed threatened plant species like Welsh's Milkweed ( <i>Asclepias welshii</i> ) and seven other rare plants such as the Nipple Bench scorpion-weed ( <i>Phacelia mammillarensis</i> ). Adding to these values, the area has a rich history of human movement and habitation, with a high density of Ancestral Puebloan cultural sites throughout. To protect these relevant and important values, this area must be designated as a right-of-way exclusion area outside of existing ROWs, and protected from OHV use which has a tendency to proliferate away from designated motorized routes in backcountry areas defined by shale and sandstone canyons, cliffs, and mesas. This is particularly true due to the ACEC's location at the edge of SITLA lands now famous for offroading and mountain bike freeriding, neither of which are compatible with protecting the paleontological, archaeological, or disturbance-sensitive rare plant resources that occur throughout the ACEC. A nomination document is in Appendix C.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	ACECs	White Cliffs ACEC The White Cliffs ACEC is located in the northwestern reaches of Grand Staircase-Escalante National Monument and encompasses expansive stretches of the famous geologic "white cliffs" formation, including its high point, Timber Mountain, Pine Point, and Little No Mans Mesa. The exact boundaries of the ACEC are provided in the enclosed map. The ACEC is defined by dramatic, expansive cliffs and mesas, thickly forested woodland, and scenic views both above and below this middle "step" in the Grand Staircase. The White Cliffs, which comprise the foundation of Little No Mans Mesa, are listed in Proclamations 6920 and 10286 as a Monument object. Proclamation 10286 also lists rare and endemic bee species near Timber Mountain as Monument objects. Little No Mans Mesa is an island off the "mainland" of Timber Mountain, and thus may provide habitat for these species, and potentially other rare species due to the intact vegetation community. To protect these relevant and important values, this area must be designated as a right-of-way exclusion area outside of existing ROWs, and protected from OHV use, destructive grazing and range improvements, and large-scale mechanical vegetation removal which threatens relict vegetation, including old-growth pinyon-juniper woodlands throughout the proposed ACEC. A nomination document is in Appendix C.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	ACECs	Willis Creek ACEC The Willis Creek proposed ACEC is located on the western boundary of the Grand Staircase-Escalante landscape, to the southwest of Cannonville and east of Bryce Canyon National Park, along the Skutumpah Road. The ACEC would include portions of Willis Creek, Lick Wash, and Bull Valley Gorge, all of which are named as Monument objects in Proclamation 10286. Those areas have spectacular slot canyons and spring-fed streams that support lush patches of riparian vegetation, another Monument object. The area has relict plant communities (mature ponderosa forest and pinyon-juniper woodlands) and numerous rare and endemic plants, which are also Monument objects. The area is surrounded by dramatic views of the Pink Cliffs and Horse Mountain. This area also includes at least 13 rare plants (listed in Appendix C, Willis Creek ACEC section) including the federally-listed threatened Kodachrome bladderpod ( <i>Physaria tumulosa</i> ). To maintain these relevant and important Monument objects this area needs to be free of OHVs (other than Skutumpah Road and other approved roads) and have minimal livestock grazing (Upper Paria Allotment). Much of this area is BLM-identified lands with wilderness characteristics and it is adjacent to the Paria-Hackberry WSA. Designating this Willis Creek ACEC will help protect the world-class canyons and other Monument objects of this rugged part of the Monument. A nomination document, with a map and photos, is in Appendix C.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	ACECs	Areas of Critical Environmental Concern, Outstanding Natural Areas, and Research Natural Areas The 2000 MMP and 2020 RMP did not designate any Areas of Critical Environmental Concern (ACEC), Outstanding Natural Areas (ONA), or Natural Environmental Areas (NEA). The 2000 MMP states: "After careful evaluation of the resources recognized in ACEC nominations, it was determined that their protection will be substantially equivalent under either Monument authority or ACEC designation" (p. 57). The 2020 RMP states that this is "because the protections provided by the national monument designation are adequate to protect the values identified and no special management is required" (ROD-4). However, in the 26 years since the Monument was established, it has become clear that the protections provided by the Monument designation are not adequate to protect the values identified. In particular, livestock grazing, recreation, water withdrawals, vehicles, vegetation removal, and climate change constitute significant threats to areas with unique values, which calls for special management attention for these areas. We appreciate that the BLM is accepting and will evaluate ACEC nominations. BLM has designated ACECs to protect objects in BLM National Monuments after they were created by proclamation. Gold Butte National Monument is one example. The Monument created several ACECs after the Monument was created in order to protect habitat and wildlife objects.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Murray	Danielle	N/A	ACECs	Areas of Critical Environmental Concern- Areas of Critical Environmental Concern (ACECs) are established to "protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes."21 They provide management prescriptions for sensitive resources with greater specificity than outlined in a larger management plan. For areas where ACEC and National Conservation Lands overlap, BLM must apply and manage the resources according to the more restrictive conservation standard.22 21 43 U.S.C. Sec. 1712(a). 22 Because many ACEC focus on the protection of a specific resource that are under threat, at times they can have stronger conservation standards than offered in the National Conservation Lands. When this is the case, the more restrictive conservation standards in the ACEC must be retained in order to protect the resource. This overlapping is common in the National Conservation Lands and BLM has recognized the importance of applying the more restrictive conservation standard in order to protect the resources. The BLM is directed to consider and give priority to the identification and potential designation of ACECs when developing, revising, or amending land use plans.23 BLM Manual 1613 lays out when lands meet the requirements of "relevance and importance" to be designated an ACEC. 24 In the two previous planning processes for the Grand Staircase National Monument, BLM found first that the entire monument met the requirements for designation as an ACEC (1999) and then conversely, that none of the lands within the monument met the requirements for designation as an ACEC (2000).25 23 In the development and revision of land use plans, the Secretary shall... give priority to the designation and protection of areas of critical environmental concern. FLPMA, Title II, Section 203(c)3. And BLM Manual 1613. 24 <a href="https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter_blmpolicymanual1613.pdf">https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter_blmpolicymanual1613.pdf</a> 25 During the 1999 Grand Staircase planning process, BLM reviewed ACEC submissions for areas throughout the Monument, and determined that the entire Monument met Manual 1613's qualifications for "relevance and importance," and therefore qualified as an ACEC: "ACEC-I No Areas of Critical Environmental Concern (ACECs) are designated in the Monument Management Plan. After careful evaluation of the resources recognized in ACEC nominations, it was determined that their protection will be substantially equivalent under either Monument authority or ACEC designation." Also, while ACEC nominations were in consideration during 2018 Grand Staircase planning process, during evaluation BLM determined that none of them met the relevant or important status for ACECs During this planning process BLM has the opportunity and obligation to apply the law and policy correctly, by fully considering ACEC designations throughout the monument boundaries and applying the correct requirements standards.	Scoping Comments GSENM- Conservation Lands Foundation.pdf
Feinberg	Jackie	The Pew Charitable Trusts	ACECs	FLPMA also mandates that BLM "give priority to the designation and protection of areas of critical environmental concern." 43 U.S.C. § 1712 (c) (3). ACECs are areas "where special management is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes." 43 U.S.C. § 1702 (a). Lands within the GSENM monument boundaries contain such an abundance of these values and resources that the whole monument was previously found to qualify for ACEC status. During the 2000 Monument Management Plan (MMP) process, the BLM found that the entire monument "was found to qualify under both R&I [relevance and importance] criteria and determined that their protection would be substantially equivalent under either monument authority or ACEC designation (BLM 1999a)." (page 3-116 of the Draft RMP/ EIS). Despite the FLPMA prioritization mandate, the 2000 and 2020 MMPs did not designate any ACECs. New ACEC designations can play a key role in addressing ongoing loss of biodiversity and climate changes by providing special management to protect resources, to prevent irreparable damage to climate resilient habitat for fish and wildlife, and to support natural processes such as carbon storage. We urge the BLM to consider and incorporate ITEK in its efforts to sustain healthy ecosystems amidst biodiversity loss and climate challenges.	Pew Comments-GSENM Scoping-9-27-22.pdf
King	Catherine	Utah Native Plant Society	ACECs	Seaman's Wash-Petrified Hollow ACEC We support designating the Seaman's Wash proposed ACEC east of Kanab including the Petrified Hollow Wash. The unusual soils (highly erosive Chinle and Moenkopi Formations, including the gypsiferous Shnabkaib member) support unique assemblages of endemic gypsophila plants, including Kane breadroot (Pediomelum epipselum), Kanab thelypody (Thelypodopsis ambigua var. erecta), Atwood's pretty phacelia (Phacelia pulchella var. atwoodii), and Meager camissonia (Camissonia exilis).	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	ACECs	Warm Creek ACEC We support designating the Warm Creek ACEC, located in the heart of the Kaiparowits Plateau, which will protect significant populations of rare species, including the Nipple Bench scorpion-weed (Phacelia mammillarensis) and potentially the federally-listed Threatened plant species Welsh's Milkweed (Asclepias welshii).	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	ACECs	White Cliffs ACEC We support designating the White Cliffs ACEC that would better protect these rare plants: MacDougal's aletes (Aletes macedougallii), Lori's columbine (Aquilegia loriae), Escarpment milkvetch (Astragalus striatiflorus), Zion draba (Draba asprella), Canaan daisy (Erigeron canaani), Zion daisy (Erigeron sionis), and Paria River Indian-breadroot (Pediomelum pariense).	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	ACECs	Willis Creek ACEC We support the designation of the Willis Creek proposed ACEC located on the western boundary of the Grand Staircase-Escalante landscape including portions of Willis Creek, Lick Wash, and Bull Valley Gorge. Those slot canyons and spring-fed streams support lush patches of riparian vegetation, surrounded by relict plant communities of mature ponderosa forest and pinyon-juniper woodlands. This ACEC will protect numerous rare and endemic plants based on records in Seinet database ( <a href="https://swbiodiversity.org/seinet/index.php">https://swbiodiversity.org/seinet/index.php</a> ), which include: - Broadleaf Gilia (Aliciella latifolia subsp. imperialis) - Canaan daisy (Erigeron canaani) - Cronquist's phacelia (Phacelia cronquistiana) - Escarpment milkvetch (Astragalus striatiflorus) - Kodachrome bladderpod (Physaria tumulosa); listed endangered (Endangered Species Act) - Kodachrome peppergrass (Lepidium montana var. stellae) - Lori's columbine (Aquilegia loriae) - MacDougal's aletes (Aletes macedougallii) - Paria River Indian-breadroot (Pediomelum pariense) - Sandloving penstemon (Penstemon ammophilus) - Stella's evening-primrose (Oenothera cespitosa var. stellae) - Zion daisy (Erigeron sionis) - Zion draba (Draba asprella)	UNPS on GSENM 2022 (1).docx
J	A	N/A	SRMAs and ERMAs	MANAGEMENT AREAS: You're not re-using any of the management areas created in the last sham plan are you? Because those were not based on reality and should be thrown out. The map of the present SRMA & ERMAs is pretty unclear. Need LOTS more clarification on what these are, why you need them, how they are different, how they will be managed differently, etc. I can't effectively comment on these management designations as I don't really understand it. How is the nature of the KEPA ERMA in any way different from the GSENM ERMA? Delineate realistic management areas around high visitation areas to keep these heavy impacts contained, but do so with an eye towards maintaining ecological and hydrologic connectivity	GSENM_20220923.docx
Jackson	Thomas and Marilyn	Star Ranch LLC	SRMAs and ERMAs	"RMAs are the BLM's land use planning-level tool for managing recreational use of the public lands." Therefore, expansion and additional services should be included in the current plan to improve Calf Creek Recreational Site.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Fiebig	Michael	American Rivers	Wild and scenic rivers	In a 2009 suitability analysis, BLM found 32 segments of river within Grand Staircase-Escalante National Monument to be suitable, totaling 252.2 miles. American Rivers strongly supports carrying these suitability determinations forward based upon the free-flowing condition and ORVs in the original analysis. Considering the aridification of the Southwest that has occurred since 2009 under accelerating climate changes to the region, the values that these streams provide are even more "rare, unique, or exemplary" than they were 13 years ago, both for humans and wildlife. WSR Suitable Stream Segments, Grand Staircase- Escalante National Monument4 4 BLM Suitable Wild and Scenic River Segments in Utah, 2009. See Table for WSR suitable stream segments in attachments	GSENM Scoping Comments_American Rivers_DOI-BLM-UT-P010-2022-0006-RMP-EIS.pdf
Fiebig	Michael	American Rivers	Wild and scenic rivers	Likewise, significant innovations have happened regarding co-management and co-stewardship with Tribes since the last RMP was completed. We encourage the Monument to reengage Tribes not only on this topic in general, but regarding the potential addition of cultural and sacred ORVs within the Escalante watershed.	GSENM Scoping Comments_American Rivers_DOI-BLM-UT-P010-2022-0006-RMP-EIS.pdf
Fiebig	Michael	American Rivers	Wild and scenic rivers	ORVs Should be Described in Detail in the RMP Because BLM is required to maintain or enhance ORVs over the life of the RMP, we ask that the Agency publish detailed descriptions of the ORVs for each segment in its plan. This will be important effectively managing these segments, and creating robust stewardship partnerships.	GSENM Scoping Comments_American Rivers_DOI-BLM-UT-P010-2022-0006-RMP-EIS.pdf
Fiebig	Michael	American Rivers	Wild and scenic rivers	Should the BLM decide to complete a new suitability analysis under NEPA, and upon completion decide not to retain any of the suitable rivers listed above in the new management plan, we ask that the Agency document and publish the changed conditions that led to such a determination.	GSENM Scoping Comments_American Rivers_DOI-BLM-UT-P010-2022-0006-RMP-EIS.pdf
Fiebig	Michael	American Rivers	Wild and scenic rivers	We also ask that BLM consider expanding the ORVs from previous analyses to include "climate refugia" where appropriate - segments of river that provide important habitats and migration corridors for species to adapt to a warmer, drier world. Watersheds are predicted to become "flashier" hydrologically, while at the same time decreasing in overall water quantity.	GSENM Scoping Comments_American Rivers_DOI-BLM-UT-P010-2022-0006-RMP-EIS.pdf
Orr	Nancy	N/A	Wild and scenic rivers	If there is Wild and Scenic consideration for any river segments in the Monument, please manage those segments to maintain their status for inclusion in the W&S system.	N/A
J	A	N/A	Wild and scenic rivers	WILD & SCENIC: Several river segments are up for inclusion in our Wild and Scenic River system. Include language on how you plan to protect the character and quality of these segments so they will continue to merit inclusion.	GSENM_20220923.docx
Jackson	Thomas and Marilyn	Star Ranch LLC	Wild and scenic rivers	Wild and scenic rivers are not intermittent streams. It was laughable that 1/4 mile segments were being studied when the Wild and Scenic River designations were made because there really weren't any rivers in Southern Utah which qualified! The severe drought and then flash flooding of the last week in August of 2022 proves that nothing GSENM did over the past 30 years lessened the impact! BLM/GSENM should make a vigilant effort to restore storage rights to North Creek Drainage so that Wide Hollow II can be constructed. Saving these headwaters would make recreation which GSENM says they support.	N/A
Popejoy	Mike	Grand Canyon Trust	Other special designations	Big Bowns Bench Research Natural Area Big Bowns Bench is a 15,000 acre sky island with abundant and robust relict vegetation (Fig. 7). We are nominating this spectacular area as an RNA. Big Bowns Bench has not been grazed for over 20 years which has allowed the native vegetation and biological soil crust to thrive. This area meets the RNA criteria by having both typical and unusual plant associations, important habitat for bighorn sheep as well as both typical and outstanding geological and soil features. Designation of this RNA is consistent with Proclamation 10286 which lists pinyon and juniper woodlands, sagebrush steppe, biological soil crusts, relict vegetation on sky islands, hanging gardens, dunal pockets and endemic plants as Monument objects. All of those features are present and in good condition on Big Bowns Bench and merit stronger protection than Monument status. Big Bowns Bench is part of the year-long bighorn sheep habitat as mapped in the AMS (2022), and we have observed bighorn sheep there. This is one of the few mesas without significant livestock impacts, therefore it merits protection to sustain native flora and fauna and to provide research and education opportunities, particularly given the ongoing changes to the climate of the region. A more detailed description of Big Bowns Bench, the rationale for designating it, and a map of the RNA are in Appendix B.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Other special designations	Devils Garden ONA is a spectacular suite of geologic formations surrounded by relatively healthy vegetation communities of pinyon-juniper woodland and shrub/grassland. A significant threat is from trampling by visitors and the abundance of social trails around these rock formations. It would be prudent to funnel visitors from the parking area onto designated trails and to discourage people from wandering all over this site, which has caused degradation to soil and vegetation.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Other special designations	Little No Mans Mesa Research Natural Area Proclamation 10286 includes Little No Mans Mesa as a Monument object in the same manner that No Mans Mesa is described, as a sky island relict plant community "whose steep walls have guarded such communities for thousands of years, providing a living window into the past." More generally, Proclamations 6920 and 10286 identify relict plant communities as Monument objects, which serve as a baseline against which to measure changes in areas impacted by human activity. The White Cliffs, which comprise the foundation of Little No Mans Mesa, are listed in Proclamations 6920 and 10286 as a Monument object. Proclamation 10286 also lists rare and endemic bee species near Timber Mountain as Monument objects. Little No Mans Mesa is an island off the "mainland" of Timber Mountain, and thus may provide habitat for these species, and potentially other rare species due to the intact vegetation community. In addition, the rare plant Paria River Indian-breadroot (Pediomelum parienae) could be present due to the similarity with No Mans Mesa where it has been documented, and Little No Mans Mesa contains other important resources. We propose that Little No Mans Mesa be designated as a Research Natural Area to protect the relict plant community present there, as in the case of the similarly valuable No Mans Mesa. Details regarding the RNA characteristics and ACEC relevance and importance criteria enumerated above, as well as a map, are included in Appendix B.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Other special designations	No Mans Mesa Research Natural Area No Mans Mesa RNA was designated in 1986 and is listed in both Proclamations 6920 and 10286 as a Monument object. We support the continued maintenance of No Mans Mesa as an RNA, which will "serve as a baseline against which to measure changes in areas impacted by human activity" (Proclamation 6920). Efforts should be made to ensure that human actions do not disturb the relict plant communities (including native grassland and old-growth pinyon-juniper) and biological soil crusts of this RNA. Continued protection of the RNA would help protect rare plants including Paria River Indian-breadroot (Pediomelum parienae) that has been found there by researchers from Utah Valley University; and plants recorded in herbarium records (accessed via swbiodiversity.org/seinet) such as Zion daisy (Erigeron sionis) and Kodachrome bladderpod (Physaria tumulosa) which is listed as threatened on the Endangered Species list. There could be other rare plants on this sky island mesa due to its isolation and lack of human disturbance.	Appendix A - Figures & Tables.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Popejoy	Mike	Grand Canyon Trust	Other special designations	Phipps-Death Hollow ONA includes the spectacular Death Hollow, a narrow canyon with a perennial stream, riparian vegetation, hanging gardens and large ponderosa pines (Fig. 5). The rare plant Jones false cloakfern ( <i>Aquilegia holmgrenii</i> ) is found in this ONA, which is the only recorded observation of that plant in the SEINet database in the Monument (a few observations are up the nearby Pine Creek on The Box Trail). This area needs to remain free of livestock to maintain the amazing ecological conditions. This area could serve as a reference area if the BLM were to identify a network of undisturbed areas in the Monument and it could be habitat for various rare plants.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Other special designations	Smoky Mesa Research Natural Area Proclamations 6920 and 10286 identify relict plant communities as Monument objects, which serve as a baseline against which to measure changes in areas impacted by human activity. We believe that what we're calling Smoky Mesa is such a relict area. Smoky Mesa is located off the southern end of Smoky Mountain and is topographically separated from it by a saddle and rock walls. It appears that Smoky Mesa has not been grazed in the past. It appears inaccessible to cattle, has no water, and has little herbaceous vegetation. Smoky Mesa contains a relict old-growth juniper community as well as a significant population of singleleaf ash, some of which also appear quite old. Interestingly, over a more than four mile route taken on top of the mesa, not a single pinyon pine was seen. This old-growth juniper/singleleaf ash community is extremely rare on the Monument. We propose that Smoky Mesa be designated as a Research Natural Area to protect the relict plant community present there. Details regarding the RNA characteristics and ACEC relevance and importance criteria enumerated above, as well as a map of the RNA, are included in Appendix B.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Other special designations	Spring Point Research Natural Area Proclamations 6920 and 10286 identify relict plant communities as Monument objects, which serve as a baseline against which to measure changes in areas impacted by human activity. We believe that the mesa associated with Spring Point and an adjacent even smaller sky island which we call Little Spring Point are both such a relict area. Little Spring Point is located just north of Spring Point mesa, but the two mesa tops are topographically separated by steep sides on each mesa. There is some old fencing around the saddle between Spring Point and the "mainland" of Timber Mountain. It is unclear whether Spring Point may have been grazed in the distant past. It appears inaccessible to cattle, but may have been accessible to goats, and could have been grazed for a short time similar to No Mans Mesa. Given the access to and small area on top of Little Spring Point it is unlikely that it was ever grazed. An inspection of the vegetation communities on top of both mesas make clear that they have not been grazed in a very long time, if ever. They contain a thriving native bunchgrass and forb community with high species diversity, which is extremely rare on the Monument. The mesas also contain manzanita, sagebrush, pinyon, juniper, and ponderosa pine, allowing for investigation into multiple plant community associations occurring in close proximity to each other. In addition, they contain relict biological soil crust, which is a Monument object listed in both Proclamation 6920 and 10286. The White Cliffs, which comprise the foundation of Spring Point and Little Spring Point, are listed in Proclamations 6920 and 10286 as a Monument object. Proclamation 10286 also lists rare and endemic bee species near Timber Mountain as Monument objects. Spring Point and Little Spring Point are islands off the "mainland" of Timber Mountain, and thus may provide habitat for these species, and potentially other rare species due to the intact vegetation community. We propose that Spring Point and Little Spring point be designated together as the Spring Point Research Natural Area to protect the relict plant communities present there. Details regarding the RNA characteristics and ACEC relevance and importance criteria enumerated above, as well as a map of the RNA, are included in Appendix B.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Other special designations	The Gulch ONA has been impacted by excessive livestock grazing for many years. That has reduced native riparian vegetation such as coyote willow and Baltic rush, which has resulted in streambank instability, bank erosion and channel widening. We propose (in the Rangeland Health and Livestock Grazing Management section) that The Gulch be made unavailable to livestock, which would help this area to recover and function more as an "outstanding natural area" as it is designated.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Other special designations	The outstanding natural area (ONA) designations of Devils Garden ONA, Escalante Canyons ONA, North Escalante Canyon ONA, The Gulch ONA and Phipps-Death Hollow ONA as well as Wolverine Petrified Wood Natural Environmental Area indicate that there are important resources in those areas that need protection. We are concerned that those outstanding natural areas are not being protected. There needs to be a greater effort to protect the ecological and cultural resources that caused them to be designated as ONAs and an NEA in the past.	Appendix C - ACECs.pdf
Popejoy	Mike	Grand Canyon Trust	Other special designations	The Wolverine Petrified Wood Natural Environmental Area has significant impacts from livestock including grazed plants, trampling and cow pies (Fig. 5). We have been made aware that some cattle remain in this area all year (beyond the permitted period of November 1 to May 15 for Death Hollow Allotment), and they do significant damage both to springs (including some close to the parking area for Wolverine Petrified Wood NEA) and the uplands. In order for this to be a "natural environmental area" livestock need to be excluded.	Appendix A - Figures & Tables.pdf
Murray	Danielle	N/A	Other special designations	Backcountry Conservation Areas <sup>26</sup> and Wildlife Migration Corridors <sup>27</sup> are two additional designations the BLM can use to conserve intact wildlife habitats and enhance and improve the quality of big-game winter range and migration corridors on public lands. We recommend consideration of these two additional designations where appropriate to protect the monument's values and objects. <sup>26</sup> <a href="https://www.trcp.org/wp-content/uploads/2020/02/BCA-FAQ_and-History.pdf">https://www.trcp.org/wp-content/uploads/2020/02/BCA-FAQ_and-History.pdf</a> <sup>27</sup> <a href="https://www.blm.gov/policy/im-2018-062">https://www.blm.gov/policy/im-2018-062</a>	Scoping Comments GSENM- Conservation Lands Foundation.pdf
J	A	N/A	Other special designations	Impacts from National Scenic Trails and routes like the Hayduke Trail should also be addressed. I don't know what perks you get when you designate a Backcountry Byway, but it seems to just be an invitation for increased use to me, so I would discourage designation.	GSENM_20220923.pdf
Holland	John	N/A	Other special designations	In order to implement a management plan that protects the objects and values identified in proclamation 10286, to elevate GSENM to National Landscape Conservation standards, to prioritize conservation first and multiple use otherwise (as discretionary) a team must be assembled with the needed skills and experience. Since the original GSENM proclamation we have learned that the best plan will never reach its full potential when understaffed.	Comments to 2022 RMP EIS.pdf
Not Provided	Not Provided	N/A	Other special designations	Make Big Bowns Bench a research natural area. Big Bowns Bench is an important example of what healthy monument land looks like without grazing. It can serve as an important research area for scientists.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Campbell	Todd	University of Tampa	Other special designations	ONAs and RNAs are largely impacted by climate change, invasive species, and lack of vegetation diversity. Whereas WSAs and ISAs are facing problems that are largely due to human related activities such as recreation and tourism. The main problem is protecting and restoring the environment in these areas. Protecting, restoring, and maintaining the environment is essential to the conservation of threatened and/or endangered species. Thus, Alternative D or E would be best. Alternative D aims to protect and maintain intact and resilient environments, while still allowing discretionary use. Alternative E aims to protect natural processes through limiting or getting rid of discretionary uses. While Alternative E is most likely the best choice, Alternative D gives flexibility to those who want to allow some discretionary and recreational use.	N/A
Campbell	Todd	University of Tampa	Other special designations	The current ONAs and RNAs in the GSENM are currently at risk due to climate change, impacts on the diversity of vegetation, as well as an increased amount of nonnative, invasive species.	N/A
King	Catherine	Utah Native Plant Society	Other special designations	UNPS supports the establishment of reference areas that can serve as benchmarks for natural conditions and Utah native plant communities.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Other special designations	Big Bowns Bench RNA We support designating Big Bowns Bench as an RNA to protect the abundant and robust relict vegetation, including mature pinyon and juniper woodlands, sagebrush steppe, biological soil crusts, relict vegetation on sky islands, hanging gardens, dunal pockets and endemic plants. This is one of the few mesas without significant livestock impacts, therefore it merits protection to sustain native flora and fauna and to provide research and education opportunities, particularly given the ongoing changes to the climate of the region. Livestock grazing should not be allowed on this RNA.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Other special designations	Little No Mans Mesa RNA We support the designation of Little No Mans Mesa as a Research Natural Area to protect the relict plant community present there. This island off the "mainland" of Timber Mountain provides habitat for relict vegetation and potentially rare species due to the intact vegetation community such as Paria River Indian-breadroot ( <i>Pediomelum parianse</i> ) among others. Livestock grazing should not be allowed on this RNA.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Other special designations	Spring Point RNA We support designating the Spring Point RNA to protect the relict plant communities there including a thriving native bunchgrass and forb community with high species diversity, which is extremely rare on the monument. The mesas also contain manzanita, sagebrush, pinyon, juniper, and ponderosa pine, allowing for investigation into multiple plant community associations occurring in close proximity to each other. Livestock grazing should not be allowed on this RNA.	UNPS on GSENM 2022 (1).docx
King	Catherine	Utah Native Plant Society	Other special designations	We support designation of the Smoky Mesa RNA located off the southern end of Smoky Mountain, which contains a relict old-growth juniper community as well as a significant population of singleleaf ash, some of which also appear quite old. This old-growth juniper/singleleaf ash community is extremely rare on the monument. Livestock grazing should not be allowed on this RNA.	UNPS on GSENM 2022 (1).docx
Jackson	Thomas and Marilyn	Star Ranch LLC	Environmental justice and social and economic values	Permitting access to local communities for traditional uses should be a priority!	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Environmental justice and social and economic values	3. Environmental Justice, and Social and Economic Values Utah is a public land state, meaning through various agencies the federal government controls approximately 66.5% of the land in Utah, which has a total land area of 52,696,960 acres.(24) Accordingly, Utah is overly impacted by federal land use policy, particularly climate related policies. When the executive branch takes steps to reduce multiple use of public lands, our towns, cities, and counties are often directly impacted. For example, over the last several decades, Utah communities (particularly those in Kane and Garfield Counties) have been economically hamstrung due to administrative decisions to reduce logging, mining, other extractive industries (and in some instances grazing). The loss of sawmills, mines, processing facilities (and other grazing infrastructure) has led to reduced employment and investment in a variety of critical infrastructure. Further, the unhealthy/unmanaged forests and rangelands caused by these reductions has created wildfire risks and costs that go far beyond the direct loss of economic activity and has done much to create disadvantaged communities in rural Utah. (24) Feuz, Ryan, Larsen, Ryan, 2020, Size and Scope of Utah Agriculture 2019, Utah State University Extension, AG/Farmland/2020-10pr. Retrieved from: <a href="https://digitalcommons.usu.edu/cgi/viewcontent.cgi?article=3129&amp;context=extension_curall">https://digitalcommons.usu.edu/cgi/viewcontent.cgi?article=3129&amp;context=extension_curall</a> .	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Environmental justice and social and economic values	Additionally, both Garfield and Kane County are low-income counties whose biggest economic drivers are agriculture and tourism. Any management conditions that reduce the economic value of agriculture or tourism in the monument would further disadvantage local communities.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Environmental justice and social and economic values	As such, in the vein of environmental justice, the BLM should analyze the burdens and harms (negative impacts) placed on local government by the monument designation. In addition to the factors listed above, these could also include such things as increased strain on increased strain on local infrastructure and the potential loss/restriction of economic industries such as livestock grazing and outdoor recreation. There is also an increased strain on county search and rescue. It's important to note that while both Kane and Garfield County search and rescue is overseen by each respective county's sheriff's office, in both instances it is a volunteer organization. The time and resources these volunteers expend is not insignificant, and due to the increased visitation on the GSENM there is an increase in search and rescue calls, further expending these volunteers' capacities and capabilities. When these volunteer crews are called away from their local communities onto the GSENM on search and rescue calls, this takes time and resources away from their communities. This tax on their time and effort should be analyzed as part of the current planning process' environmental justice, social and economic value framework.	GSENM RMP Scoping Comments 27SEPT2022.pdf



Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Griffin	Simone	BlueRibbon Coalition	Socioeconomics / economic analysis	Consider this passage from Billionaire Wilderness where Justin Farrell describes how land conservation fueled the intense wealth inequality that is becoming increasingly characteristic of Colorado's gateway mountain communities: But data reveal that this economic thinking is misguided, especially in places where ultra-wealth and inequality collide with pervasive land conservation. What this means is that the "rising tide lifts all boats" approach can have the effect of intensifying economic differences. More specifically, and following the same logic as earlier with the protection and production of wealth, I consider the effect of land conservation on which job sectors are growing or declining (that is, available jobs and total income), and as a result, the staggering decline of reasonably priced housing. First, conservation has directly and indirectly intensified wealth inequality by making the area uniquely attractive to the ultra-wealthy, creating intense housing demand and land scarcity that has dramatically reshaped who lives in the community, and how people make their money. [...] As more and more ultra-wealthy people move to the area for natural amenities (for example, protected lands, abundant wildlife), it dramatically restructured the socioeconomic hierarchy - becoming both a cause, and a consequence, of conservation values. Conservation became a form of elite cultural currency, and conservation organizations benefited from the financial flow down, all while it became harder for middle- and lower-income people to survive there (pp. 96-97). Farrell's work also documents how the ultra-wealthy commandeer local governments to the extent that these governments become vehicles for enacting their preferred policy preferences, which include highly restricting public access to public land. While we generally believe that federal land agencies should show deference to local communities, when those communities are captured by elitist economic interests and begin to advocate for policies that cut off the general public from federally managed public land, than it is imperative for the federal government to check and balance the misguided use of local power.	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Socioeconomics / economic analysis	We attended many of the public meetings for the RMP planning period, and we were concerned to hear private property owners making the arguments for conservation that are the subject of critique in the works cited by Sun-Hee Park, Pellow, and Farrell. It is often the case when the ultra-wealthy colonize western communities that they use private property and conservation easements to create buffer zones that prevent public access to public lands. Given the land ownership patterns in this RMP area, it is very likely that privately developed land-use restrictions will inevitably result in decreased access to public lands by the public. When combined with the socioeconomic forces behind this trend, this loss of access will disproportionately impact those marginalized by poverty and inequality.	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Socioeconomics / economic analysis	Conservation policies and land-use restrictions are the primary tools that the ultra-rich use to disenfranchise the remaining American public from being able to access and enjoy the public benefits of public land. In many cases public lands become the private enclaves for the enjoyment of recreation pursuits and cultural values of the ultra wealthy.	GSENM Resource Management Plan Scoping.docx-2.pdf
Todd	Robin	Maryland Ornithological Society	Socioeconomics / economic analysis	Economic Values: We believe that watchable wildlife, heritage tourism, and the economic benefits of unimpaired wild lands will prove to be more valuable and more sustainable than the alternatives that would expand ORV routes and development of minerals and fossil fuels. We favor preserving local natural resource-based economies and generations-old traditions in southern Utah. With careful planning and execution, these industries can remain an integral and essential part of evolving tourism-based economic development, and both sectors can flourish.	MOSltrr_GrandStaircaseScopingSep2022.pdf
Pollack	Lonnie	N/A	Socioeconomics / economic analysis	2.The management plan needs to ensure that the economic and cultural values are maintained.	N/A
John	Brandi	N/A	Socioeconomics / economic analysis	These roads, trails and recreation areas are crucial for the local economy for communities such as Escalante and Kanab as well as other small communities that rely on access to the monument. The U.S. Bureau of Economic Analysis showed that in 2019 the outdoor recreation industry brought in \$459.8 billion nationwide. By limiting access to the monument or decommissioning trails the BLM could be harming the local economy and robbing them of potential income.	N/A
Shakespeare	Dave	N/A	Socioeconomics / economic analysis	I live in Kanab and own a business here. We depend on locals and tourists to keep our business going. Anything that will help people to visit and stay longer will help the economy of our community and our ability to welcome visitors to the Grand Staircase.	Dear GSENM RMP Project Manager.docx
Not Provided	Not Provided	N/A	Socioeconomics / economic analysis	My primary concerns are developing a plan that supports local communities and heritage, including economies. Its fact that tourism has become the largest portion of local economies in vicinity of the GSENM. However, much of the tourism is seasonal, and small towns see an influx of seasonal workers that leave post season. There are few direct long term benefits to the population, schools, and economy through the winter. Allowing for diversified types of tourism including hiking, biking, horseback riding, jeeping, ATV/UTV use and trails, etc. would be much more beneficial. Past management has championed more of a "primitive" back-country type of tourism/visitation experience.	N/A
O'Brien	Mary	N/A	Socioeconomics / economic analysis	The Draft EIS must include an economic analysis of the Social Cost of Carbon associated with methane emissions by cattle grazing on the Grand Staircase-Escalante National Monument (see attached document, Kauffman, et al. 2022). The establishment of a Big Bowns Bench Research Natural Area is important, as this bench, free of livestock grazing for 20 years can serve as a reference site for the development of biocrust, the establishment and fate of native plant species, and use by bighorn sheep of a critical source of spring water amid climate change.	Kauffman et al_2022_Livestock and Climate Change_SCC.pdf
LeFevre	Mason	N/A	Socioeconomics / economic analysis	My second comment has more to do with the cultural side of the monument designation. The designation of the monument has led to the gradual loss of a way of life. The lack of range improvements and maintenance mentioned in my previous comments has been the final blow to many families who make their livelihood ranching in this area. With more and more areas becoming overgrown with juniper, it has concentrated grazing animals and wildlife into smaller and smaller areas. This in combination with not allowing both vegetative and structural range improvements, has made it nearly impossible for these families to continue their livelihood. This way of life and culture, was a large part of the monument when it was created, and it should be part of the monument going into the future.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Socioeconomics / economic analysis	<p>12.1. Socio-Economic Impacts of Livestock Grazing on GSENM Cattle Ranchers are a critical component of Utah's livestock grazing industry, which plays a vital role in Utah's economy. Utah's plentiful rangelands support more than 6,000 cattle ranching families, making livestock production the foundation of Utah's agricultural industry.(50) Over three-quarters of Utah's agricultural income is generated by livestock and livestock products, with beef cattle and milk leading the way.(51) In 2020, cattle and calf sales produced \$456 million.(52) As a result of the federal government owning most of the land in Utah, ranching operations "require a combination of private and public lands to be sustainable and economically viable," and "[r]anchers face significant uncertainty with 63% of Utah's lands under federal control."(53) (50) Utah Economic Council, Economic Report to the Governor 83 (2022), <a href="https://gardner.utah.edu/wp-content/uploads/ERG2022-Full.pdf?x71849&amp;x71849">https://gardner.utah.edu/wp-content/uploads/ERG2022-Full.pdf?x71849&amp;x71849</a> . See Also, Alevy, J., Fadali, E., and Harris, T. R. 2007. Analysis of Impacts on Public Land Grazing on the Elko County Economy, Jarbridge and Mountain City Management Area: Economic Impacts of Federal Grazing in Elko County. University of Nevada Reno; See Also, Fletcher, R. R., Borden, G. W., and Grumbles, R. 2006. Economic Impacts of Livestock Grazing and Recreation on the Arizona Strip. University of Arizona; see also Lewin, P. A., Rimbey, N. R., Brown, A., Jensen, S. K., and Wulforth, J. D. 2014. Regional Economic Impact Model of Owyhee County. University of Idaho; See Also, Taylor, D. T., Coupal, R. H., and Foulke, T. 2005. The Economic Impact of Federal Grazing on the Economy of Park County, Wyoming. University of Wyoming. (51) Id. (52) Id. (53) Id. at 84 "At least three independent studies have shown that through multiplier effects, each AUM permitted for use in the region generates approximately \$100 in economic activity within Kane and Garfield Counties. Ranchers hire workers, make payments on bank loans, buy supplies and engage in other types of commercial activity, stimulating economic ripple effects within the community. Revenues from livestock operation made up more than 80% of all agricultural revenues in the [monument] area in 2012, bringing in more than \$12 million in revenues in 2012 alone in [Garfield and Kane Counties]."(54) Adding neighboring Coconino County, AZ, to the analysis brings the total up to more than \$35 million in revenues.(55) Even when agricultural enterprises lose money in the region, this serves as a means of channeling a flow of money from outside the region into the communities within the GSENM area.(56) (54) Bureau of Land Management US Department of Interior, Grand Staircase-Escalante National Monument, Livestock Grazing Plan Amendment EIS, Socioeconomic baseline report. P.1-2 (55) Id. (citing USDA 2012 Census of Agriculture County Reports) (56) Id.</p>	GSENM RMP Scoping Comments 27SEPT2022.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Socioeconomics / economic analysis	<p>In addition to the ecological benefits of livestock grazing, there are also important economic benefits from livestock grazing within GSENM. Farm employment consists of 8.8% of all jobs in Garfield County, with the total cash receipts from agriculture production being over \$31,331,000 in 2020, of which, over \$18,395,000 came from livestock production.(64) Farm employment consists of 3.2% of all jobs in Kane County, with the total cash receipts from agriculture production being over \$14,410,000 in 2020, with over \$7,800,000 coming from livestock production.(65) The median household income for residents in Garfield County is \$54,625 annually and \$55,887 for Kane County residents.(66) Both counties are well below the statewide median household income of \$75,705 for the state of Utah.(67) This shows how essential agricultural production, and especially livestock grazing, is for the counties' economies. Overall, livestock production is a large agricultural driver in these counties and contributes substantially to residents' economic wellbeing. (64) Economic Profile System. 2020. Agriculture Report. Headwater Economics. (65) Ibid. (66) Utah Department of Workforce Services. 2019. Income and Wages. (67) Ibid.</p>	GSENM RMP Scoping Comments 27SEPT2022.pdf
Goreham	Dennis	Wasatch Mountain Club	Socioeconomics / economic analysis	<p>Economy: The Monument should be an invaluable asset to the local and regional tourism economies. The local economy must be protected, or enhanced, through this process. As visitors frequent the area, they should be made aware of opportunities to use local businesses to meet their needs or enhance their experience. The plan should recognize the role of commercial guide services as a way to educate visitors on low-impact travel. A thriving economy, tied to the Monument, would be a very positive amenity for the quality of life in the area.</p>	GSENM WMC comment 09182022.doc
Griffin	Simone	BlueRibbon Coalition	Environmental justice	<p>Any approach to management that presumes the superiority of non-motorized forms of recreation like hiking over motorized recreation, or that justifies closing motorized access on the basis that people can still hike on those routes, is inherently discriminatory toward people with disabilities. Any large-scale closures of existing routes would unfairly and inequitably deprive people with disabilities of the ability to recreate in the area using the only means available to them. It is imperative that the BLM consider the access needs of disabled users in drafting the alternatives for this travel plan and ensure that people with disabilities who depend on motorized means do not lose access.</p>	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Environmental justice	<p>Every time motorized routes or areas are closed, people with disabilities that require the use of motorized means to access public lands are barred from those areas forever. There has been little recourse for such people in the past because the Americans With Disabilities Act does not require public land management agencies to consider disproportionate effects on the disabled community, but only requires that they be given access to public lands on equal terms with everyone else. As a result, the BLM has historically failed to give any real consideration to the impacts of motorized route closures on the disabled community when developing travel management plans.</p>	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Environmental justice	<p>Management policies focused on "minimizing" the environmental impacts of motorized recreation have resulted in a dramatic decrease in motorized recreation opportunities on public lands over the last 20 years, which has disproportionately impacted people with disabilities. Wilderness focused environmental groups with extreme ableist biases have pushed for more and more areas to be closed to motorized recreation and reserved exclusively for hikers, mountain bikers, and other "human powered" and "quiet use" forms of recreation in which many people with disabilities are unable to participate.</p>	GSENM Resource Management Plan Scoping.docx-2.pdf
Griffin	Simone	BlueRibbon Coalition	Environmental justice	<p>On his first day in office, President Joe Biden issued an "Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government." This executive order established "an ambitious whole-of-government equity agenda" which focuses on addressing "entrenched disparities in our laws and public policies," and mandates a "comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality." Under this executive order, "The term 'equity' means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as ... persons with disabilities...." Historically, there has been no group more greatly marginalized and excluded by public land management policies, and motorized travel management policies in particular, than people with disabilities. Outdoor enthusiasts with ambulatory disabilities frequently rely on motorized travel as their sole means to enjoy recreating on public lands. Not everyone has the ability to hike into a remote wilderness area, but many such people are still able to drive Jeeps, side-by-sides, and ATVs, which are restricted to the designated motorized route network.</p>	GSENM Resource Management Plan Scoping.docx-2.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Griffin	Simone	BlueRibbon Coalition	Environmental justice	Users with Disabilities We recommend that the BLM use this planning process to finally begin to reverse its decades-long systematic discrimination against those with mobility impairment-related disabilities. In April 2022 the Department of Interior released its Equity Action Plan which states, "Public land visitation data collected from the Department's bureaus suggests that certain underserved communities are underrepresented as public land visitors, relative to their presence in the U.S. population at large." This includes persons with disabilities and limited physical access.	GSENM Resource Management Plan Scoping.docx-2.pdf
Action Committee	CTVA	Capital Trail Vehicle Association	Environmental justice	The agency should carefully consider the social justice issues associated with imposing their will on motorized recreationists.	CTVA Grand Staircase Escalante Comments 9 13 2022.pdf
Berry	Scott	N/A	Environmental justice	i.Adopt policies designed to minimize negative impacts to tribal interests, low income (income below median levels) and minority populations at local, regional and national scales consistent with the mandated protection and conservation priorities at GSENM. ii.Demonstrate and emphasize through programmatic decisions that conservation goals expressed in Proclamation 10286. generally complement the socio-economic interests of tribal interests, low income and minority populations at local, regional and national scales. iii.Create a permanent program to foster non-determinative collaboration between local economic interests, public agencies, conservation organizations, scientists and economists about potential resolutions to specific resource use conflicts. iv.Expand the environmental justice analysis area beyond local counties to include all communities in Utah and in the western United States where potential visitors to GSENM reside, with special emphasis on Native American populations in Utah, Arizona, New Mexico, and Colorado. Reject an approach that assumes that environmental justice concerns relevant to GSENM terminate at the borders of adjoining counties. Similarly, reject any approach that equates federal poverty standards with low income, and instead use median income data to identify communities where income is below the median.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Environmental justice	Environmental Justice, and Social and Economic Values: Inclusion of tribal members, leaders, and representatives in the management of GSENM is essential to these values. This inclusion provides (1) educational opportunities for BLM staff, ranchers, tribal members, and visitors, (2) direct employment for tribal communities, (3) scientific engagement that can increase capacities to respond to drought, climate change, and overgrazed lands on the reservation, (4) opportunities for Navajo-owned businesses to operate on the monument, (5) participation in co-stewardship, and (6) for the continuance or revival of traditional cultural practices on GSENM lands. While we do value the economic benefits that the Monument can provide, we also wish to see the balance in prioritization of projects, not always valuing consumptive and economic values over traditional cultural and conservation values. In addition, please consider that the management of traditional uses, like plant collection, should not place an undue administrative or practical burden on collectors.	N/A
McCoy	Melissa	U.S. EPA Region 8	Environmental justice	Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" (February 16, 1994), directs federal agencies to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations. It further directs agencies to develop a strategy for implementing environmental justice and providing minority and low-income communities access to public information and public participation. As such, BLM should address adverse environmental effects of the proposed plan on these communities and outline measures to mitigate for impacts. In BLM's preparation of the environmental justice analysis, we encourage consideration of two specific resources: 1) CEQ's Environmental Justice: Guidance Under the National Environmental Policy Act report <sup>2</sup> and 2) the Federal Interagency Working Group on Environmental Justice and NEPA Committee's Promising Practices for Environmental Justice Methodologies in NEPA Reviews report. <sup>3</sup> These documents provide information on applying environmental justice methodologies that have been established in federal NEPA practice. <sup>2</sup> See <a href="https://www.epa.gov/sites/production/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf">https://www.epa.gov/sites/production/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf</a> . <sup>3</sup> See <a href="https://www.epa.gov/sites/production/files/201608/documents/nepa_promising_practices_document_2016.pdf">https://www.epa.gov/sites/production/files/201608/documents/nepa_promising_practices_document_2016.pdf</a> . In obtaining data for the environmental justice scoping analysis to determine the presence of minority and low-income populations, we strongly encourage BLM to use EPA's EJScreen. <sup>4</sup> EPA's nationally consistent EJ screening and mapping tool is a useful first step in highlighting locations that may be candidates for further analysis. The tool can help identify potential community vulnerabilities by calculating EJ Indexes and displaying other environmental and socioeconomic information in color-coded maps and standard data reports (e.g., pollution sources, health disparities, critical service gaps, climate change data). EJScreen can also help focus environmental justice outreach efforts by identifying potential language barriers, meeting locations, tribal lands and indigenous areas, and lack of broadband access. For purposes of NEPA review, a project is considered to be in an area of potential EJ concern when the area shows one or more of the twelve EJ Indexes at or above the 80th percentile in the nation and/or state. However, scores under the 80th percentile should not be interpreted to mean there are definitively no EJ concerns present. <sup>(4)</sup> EJScreen is an online mapping tool that can aid the agencies in developing outreach for EJ communities. The tool is available at <a href="https://ejscreen.epa.gov/mapper/">https://ejscreen.epa.gov/mapper/</a> . While EJScreen provides access to high-resolution environmental and demographic data, it does not provide information on every potential community vulnerability that may be relevant. The tool's standard data report should not be considered a substitute for conducting a full EJ analysis, and scoping efforts using the tool should be supplemented with additional data and local knowledge when reasonably available. Also, in recognition of the inherent uncertainties with screening level data and to help address instances when the presence of EJ populations may be diluted (e.g., in large project areas or in rural locations) EPA recommends assessing each block group within the project area individually and adding a one-mile buffer around the project area. Please see the EJScreen Environmental Justice Mapping and Screening Tool Technical Documentation document for a discussion of these and other issues. <sup>5</sup> <sup>(5)</sup> See <a href="https://www.epa.gov/sites/default/files/2021-04/documents/ejscreen_technical_document.pdf">https://www.epa.gov/sites/default/files/2021-04/documents/ejscreen_technical_document.pdf</a> We recommend presenting opportunities for affected communities to provide input into the NEPA process. In the Draft EIS, include information describing what was done to inform these communities about the plan and the potential impacts it may have on their communities (notices, mailings, fact sheets, briefings, presentations, translations, newsletters, reports, community interviews, surveys, canvassing, telephone hotlines, question and answer sessions, stakeholder meetings, and on-scene information), what input was received from the communities, and how that input was utilized in the decisions that were made regarding the plan.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf

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Pollock	Leland	Garfield County Commission	Environmental Justice	The AMS has identified Garfield and Kane Counties as meeting the threshold for a low-income population and an environmental justice community. With the development of the monument, the residents of Garfield and Kane Counties have been limited in the method of earning income in this area. What is left are grazing, recreation opportunities, preexisting mineral development, and tourism. According to the 2015 Socioeconomic Baseline Study for the GSENM Livestock Grazing MMP-A/EIS, livestock operations alone made up more than 80% of all agricultural revenues in the study area in 2012, bringing in more than \$12 million in revenues in that year for Garfield and Kane Counties. Due to this, Garfield County discourages any management efforts to reduce the amount of grazing, recreation, preexisting mineral development, or tourism within the GSENM. Any efforts to do so will be recognized as a violation of Executive Order 12898.	Garfield County Commission.pdf
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Wild horses	20.2. Wild Horses The State is concerned that the BLM intends to establish goals, objectives, and management actions concerning wild horses as part of the GSENM RMP planning process. The State is concerned because there are no active Herd Management Areas ("HMA") within the borders of the GSENM. It is the State's understanding that there was a Herd Area ("HA") in the vicinity of Glen Canyon National Recreation Area, however, that HA was "zeroed out" long ago by the BLM. The Wild and Free Roaming Horses and Burros Act ("WFRHBA") of 1971 (Public Law 92-195) section 3. (b) 2)t, states "Where the Secretary determines on the basis of (i) the current inventory of lands within his jurisdiction; (ii) information contained in any land use planning completed pursuant to section 202 of the Federal Land Policy and Management Act of 1976; (ii) information contained in court ordered environmental impact statements as defined in section 2 of the Public Rangelands Improvement Act of 1978; and (iv) such additional information as becomes available to him from time to time, including that information developed in the research study mandated by this section, or in the absence of the information contained in (i-iv) above on the basis of all information currently available to him. That an overpopulation exists on a given area of public lands and that action is necessary to remove excess animals, he shall immediately remove excess animals from the range so as to achieve appropriate management levels..." This Act gives the BLM authority to "zero out" an HA where the HA lacks the necessary habitat components for management of wild horses. Once a decision has been made to zero out the HA, that is the ongoing management plan for those horses, even if a small population persists. Here, the fact that the GSENM RMP process is considering wild horses as part of its management plan is extremely concerning to the State. The State would oppose any management plan of these horses that is inconsistent with the previous decision to zero out the horse population and maintain the HA at zero.	GSENM RMP Scoping Comments 27SEPT2022.pdf
Campbell	Todd	University of Tampa	Wild horses	Wild horses are known to have a negative impact on the environment. When managed improperly, wild horses can graze too much of the vegetation causing a decline in species that rely on that vegetation. For example, wild horses are known to graze on sagebrush and sagebrush is critical to species such as the sage grouse (Coates, 2021). Wild horses have also affected other animal behaviors/tendencies. For example, water sources frequented by wild horses show a decreased native wildlife species richness and diversity. While the impact of this is unknown, the competition for water in a water-limited environment can increase conservation efforts for native wildlife (Davies and Boyd, 2019). Two wild horse Herd Areas (HA) are currently located in two parts of the GSENM, the Moody-Wagon Box Mesa Herd Area (Northeastern) and the Harvey's Fear Herd Area (Southeastern). HAs are areas that are not managed for wild horses and burros, while HMAs are areas that are managed. There are between ten and twenty-five wild horses at Harvey's Fear Herd Area, while there are none at the Moody-Wagon Box Mesa Herd Area (Bureau of Land Management, 2018). Currently, the population is kept in check by limiting resources, predators, and natural death. Bureau of Land Management. (1988). Areas of Critical Environmental Concern. <a href="https://www.ntc.blm.gov/krc/uploads/360/5_1613_ACEC_Manual%201988.pdf">https://www.ntc.blm.gov/krc/uploads/360/5_1613_ACEC_Manual%201988.pdf</a> Bureau of Land Management. (2018). Herd Area and Herd Management Area Statistics. <a href="https://www.blm.gov/sites/blm.gov/files/wildhorse_programdata_2018hmastats.pdf">https://www.blm.gov/sites/blm.gov/files/wildhorse_programdata_2018hmastats.pdf</a> Coates, Peter S., et al. "Sage-Grouse Population Dynamics Are Adversely Affected by Overabundant Feral Horses." The Journal of Wildlife Management, vol. 85, no. 6, Aug. 2021, pp. 1132-49. DOI.org (Crossref), <a href="https://doi.org/10.1002/jwmg.22089">https://doi.org/10.1002/jwmg.22089</a> Davies, Kirk W, and Chad S Boyd. "Ecological Effects of Free-Roaming Horses in North American Rangelands." OUP Academic, Oxford University Press, 26 June 2019, <a href="https://academic.oup.com/bioscience/article/69/7/558/5519497">https://academic.oup.com/bioscience/article/69/7/558/5519497</a> .	N/A

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Murray	Michael B.	Coalition to Protect America's National Parks	Noise	Natural Soundscapes Proclamation 10286 specifically recognizes the intense quiet and quality of GSENM natural soundscape as a resource that must be protected. "The Grand Staircase-Escalante area also provides a remarkable natural soundscape with infrequent human-caused sounds. From popular recreational destinations to remote, isolated locations, acoustic baseline research has found that some of the quietest conditions found in protected areas across the United States can be found in the Grand Staircase-Escalante landscape." Pres. Proc No. 10286, 86 Fed. Reg. 57,335 (Oct. 8, 2021). Noise impacts the acoustical environment by obscuring the listening environment for both visitors and wildlife. An appropriate acoustical environment is also an important element in how we experience the cultural and historic resources in the monument and national parks. Places of deep quiet are most vulnerable to noise. Therefore, wildlife in remote wilderness areas and park visitors who journey to these quiet places are likely to be especially sensitive to noise. In addition, soundscapes are part of the "human environment" subject to the requirements of NEPA. 42 U.S.C. § 4331 (C); see also Wyoming v. United States DOI, 674 F.3d 1220, 1236 (10th Cir. 2012) (upholding NEPA analysis in part because NPS properly considered "soundscapes"). NPS strives to "preserve, to the greatest extent possible, the natural soundscapes of parks."10 "In and adjacent to parks, the Service will monitor human activities that generate noise that adversely affects park soundscapes, including noise caused by mechanical or electronic devices." Id. Bryce Canyon has identified the "predominance and maintenance of natural quiet" as "an essential resource critical to visitor experience and the functioning of biological systems."11 Indeed, "[d]uring sound monitoring efforts in the park, at some locations natural ambient decibel levels often were lower than data collection systems could measure, making Bryce Canyon an exceptionally quiet place." Id. at 24. "However, this also means the quiet nature of the park-and by extension the visitor experience-are exceptionally susceptible to disturbance from extrinsic noise." Id. 11 Bryce Canyon National Park Foundation Document at 11, available at <a href="https://www.nps.gov/brca/learn/management/upload/BRCA_FD_SP.pdf">https://www.nps.gov/brca/learn/management/upload/BRCA_FD_SP.pdf</a> Similarly, natural quiet is an important part of visitors' experience in Capitol Reef. There is currently "very little noise pollution in the park" and "[t]he backcountry areas of the park are managed for wilderness qualities, including natural quiet." Capitol Reef Gen. Mgmt. Plan at 109. Thus, any "increase in noise that affects the natural quiet of the backcountry . . . would be considered significant." Id. To protect the natural quiet in the Planning Area and adjacent Parks, BLM should continue to manage with constraints on development and human activity and add stipulations or enforceable requirements to any permitted development or activity that has the potential to degrade the natural soundscapes. The RMP should inventory and monitor natural soundscapes and require interpretive materials/programs to be developed to educate and engage the public about natural soundscapes.	NPCA & Coalition GSE RMP scoping FINAL.pdf
Popejoy	Mike	Grand Canyon Trust	Noise	Various models and methodologies that constitute best available scientific information are available for purposes of conducting soundscape modeling.118 BLM should also further analyze why certain remote pockets of the Monument show elevated baseline decibel ranges (e.g., the area to the southwest of Hole-in-the-Rock Road). Zion National Park has developed a soundscape management plan that could serve as a model.119 We encourage BLM to consider adopting elements of that plan, including potential soundscape zoning of the Monument with associated objectives and management actions, as well as ongoing monitoring and, as necessary, adaptive management designed to ensure maintenance of the natural soundscape and compliance with the Proclamation. At a minimum, the plan should require soundscape modeling and analysis for project-level decision-making that could alter baseline conditions and set protective standards for modeled and actual/monitored sound levels, particularly near noise-sensitive receptors (e.g., important wildlife habitat, VSAs, Lands with Wilderness Characteristics, and developed and primitive recreation locations). 118 Alexander C. Keyel et al. (2018). Evaluating anthropogenic noise impacts on animals in natural areas. Landscape and Urban Planning 180: 76-84. 119 National Park Service. (2010). Zion National Park Soundscape Management Plan, <a href="https://parkplanning.nps.gov/document.cfm?parkID=113&amp;projectID=30628&amp;documentID=36422">https://parkplanning.nps.gov/document.cfm?parkID=113&amp;projectID=30628&amp;documentID=36422</a>	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Noise	We are pleased to see that BLM has already prepared mapping and information on baseline soundscape conditions, which show that "[s]ites within GSENM were found to be within a range of the quietest locations in protected areas monitored in the lower 48 states, based on exceedingly low decibel levels," with "highest percentages of human-caused noise . . . created by high altitude jets and visitors at popular recreation sites."117 Nevertheless, BLM predicts that "increasing visitation/air travel and the potential development of inholdings and adjacent private lands" could cause "the current levels of quietness to shift to some degree." To the extent that BLM analyzes alternatives that could have reasonably foreseeable acoustic impacts (e.g., prioritizing more intensive recreational use, permitting scenic overflights, and allowing increased use of drones for recreational and scientific purposes), it should utilize acoustic modeling to fully analyze those impacts to Monument objects and values, and then design plan direction to avoid, minimize, and mitigate those impacts and ensure compliance with the Proclamation. 117 BLM, GSENM Resource Management Plan and EIS Soundscapes Poster, <a href="https://eplanning.blm.gov/public_projects/2020343/200528424/20066485/250072667/202208_Poster_Sound_50">https://eplanning.blm.gov/public_projects/2020343/200528424/20066485/250072667/202208_Poster_Sound_50</a> 8.pdf; GSENM RMP/EIS Analysis of the Management Situation, Section 5.18.3, pp. 5-138 - 5-129.	Appendix C - ACECs.pdf

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Popejoy	Mike	Grand Canyon Trust	Noise	Non-natural noise can affect the physiology, behavior, and spatial distribution of wildlife. While impacts vary by species and habitat, studies have shown that anthropogenic noise can impact species in ways crucial to survival and reproductive success.114 Anthropogenic noise also has significant impacts on recreationists who visit natural areas like Grand Staircase-Escalante National Monument to escape non-natural noises and attain a sense of solitude and tranquility. Studies have found that anthropogenic noise interferes with the quality of the visitor experience and even impacts the perceived visual and aesthetic qualities of the landscape.115 Indeed, anthropogenic noise 3-10 dB above natural sound levels is known to annoy some visitors, reducing enjoyment of parks and interfering with natural quiet.116 Non-natural noise degrades wilderness characteristics as well, including apparent naturalness and opportunities for solitude. See 16 U.S.C. § 1131(c). 113 Buxton, Rachel T., Megan F. McKenna, Daniel Mennitt, Kurt Fristrup, Kevin Crooks, Lisa Angeloni, and George Wittmeyer. (2017). Noise pollution is pervasive in U.S. protected areas. Science 356(6337): 531-533. 114 Shannon, Graeme et al. (2016). A synthesis of two decades of research documenting the effects of noise on wildlife. Biological Reviews 91: 982-1005; Barber, Jesse R., Kevin R. Crooks, and Kurt M. Fristrup. (2009). The costs of chronic noise exposure for terrestrial organisms. Trends in Ecology and Evolution 25(3): 180-189. 115 Mace, Britton L., Paul A. Bell, and Ross J. Loomis. (1999). Aesthetic, Affective, and Cognitive Effects of Noise on Natural Landscape Assessment. Society and Natural Resources 12: 225-242. 116 Rapoza, A., Sudderth, E., & Lewis, K. (2015). The relationship between aircraft noise exposure and day-use visitor survey responses in backcountry areas of national parks. The Journal of the Acoustical Society of America, 138(4), 2090-2105. BLM must take a hard look at these and other reasonably foreseeable acoustic impacts on the natural soundscape of the Monument and develop management plan direction to avoid, minimize, and mitigate those impacts.	Appendix B - RNA Proposals.pdf
Rubin	David	N/A	Noise	Paving or other construction on the Hole-in-the-Rock Road are designed to increase driving speeds and traffic, and will certainly increase road noise that will be audible at Zebra, Tunnel, and Bighorn slot canyons, and at our home. It is likely that paving and increased driving speeds will contribute to increased degradation of remoter regions of GSENM.	2017 Rubin et al Geology.pdf
Woodruff	Richard	N/A	Noise	The use of helicopters and drones in the monument must be managed to protect the integrity of the monument. The sound from the ever increasing commercial use of airborne vehicles over the monument devalues the individual experience on the ground.	N/A
Friedman	Bob	N/A	Noise	New technologies bring new challenges. While hiking I've had mixed feelings about cell phone towers, but understand now that people are flying drones & helicopter companies are flying people around. First hand, I will say loud machines overhead just echo off the rock walls and it can get really loud down there. Obviously nothing can be done about airplanes flying by, but just mentioning that they make a great deal of noise themselves, but nothing compared to a helicopter, especially flying at low elevation. It doesn't take many of those to completely ruin one's time down in the canyons.	N/A
Bagley	Charles	N/A	Noise	Noise blasts from small planes? How can that be compatible with the President's Values of "undisturbed" "natural soundscape", and "quietest conditions"? The Utah Backcountry Pilots Assoc. claims that "Noise from aircraft is insignificant and transient and short duration as a recreational aircraft flies overhead." But that's not most hiker's experience. The noise continues for many minutes to a half hour as the plane approaches over our beautiful but not sound-absorbing lands, circles a few, or many times, and lands. Then it all gets repeated later as the plane takes off! Some pilots actually fly into canyons below the rims! This magnifies the noise.	N/A
Phillips	Bob	N/A	Noise	However, though it is well established that vehicle noise disturbs visitors, the effect of vehicle noise on wildlife has often been overlooked. Vehicle noise not only affects wildlife behavior, it also causes hearing damage to animals (such as rodents and reptiles) that cannot quickly escape from the noise. Please see the attached PDF "The Impacts of Off-Road Vehicle Noise on Wildlife".	impacts of off-road vehicle noise on wildlife.pdf
Luedemann	Craig	N/A	Noise	I read somewhere that there might be expanded opportunities for helicopter "tours" of the Monument? From my experience hiking in the Grand Canyon and hearing helicopters I can tell you that it was extremely disruptive to hear the drone of helicopters overhead. I hope that you will do everything you can to preserve the Monument as a peaceful place for visitors.	N/A
J	A	N/A	Noise	I would also like to generally see more restrictions on OHVs, more enforcement, and the implementation of some kind of muffler requirement or restrictions of decibel-levels of equipment. In this desert landscape, sound carries and those louder OHVs like razors obliterate silence for long periods of time. OHV allowance nearby any Wilderness or WSA boundary should be strongly scrutinized and discouraged.	GSENM_20220923.docx
Clayson	Dirk	N/A	Noise	Management of soundscapes is overreaching and not part of the historical values managed. There are no practical means to manage this and I feel this is just an attempt to keep public out of public lands. Hunting for example has noise, recreation has noise, most all things in nature will have noise at times.	N/A
Orr	Nancy	N/A	Noise	Natural soundscapes should be protected - OHVs should be required to meet decibel levels no higher than a stock vehicle.	N/A
J	A	N/A	Noise	prohibit motorized vehicles much further upstream from No Man's Mesa. dirt bikes and OHVs presently run all the way down on either side of No Man's (from that road that comes in from the north) which doesn't make for much silence and solitude.	GSENM_20220923.pdf
Berry	Scott	N/A	Noise	The BLM should identify and quantify the degree to which sounds from existing uses result in diminishment of remoteness, solitude and primitive character, and investigate ways where methods of use can be modified or adjusted so as to reduce impacts to reduce sound impacts. e.g motor vehicle equipment sound control requirements.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Sjogren	Morgan	N/A	Noise	The monument needs to be managed to limit increases in human made noises. The natural environment is a monument object to protect, and a primary reason that people come to experience GSENM.	40 Mile Gulch _ 2 May 2020.pdf
J	A	N/A	Noise	This should included an increase in OHV restrictions, a muffler/decibel requirement, no special recreation permits in areas known for high quality soundscapes.	GSENM_20220923.pdf
Johnson	Steven	N/A	Noise	In my opinion, preservation means that incursions by exploitive industries, mechanized land maintenance, and off-road vehicles should be prohibited. The noise and pollution and environmental degradation done by such users are incompatible with the wild natural splendor of these lands.	N/A
R	Matt	N/A	Noise	It's important to me that aviation remains an allowable use for the land. As pilots, we don't cause damage or erosion to paths coming in and out, needing only a flattened area to land and take off. Noise is an issue, yes, but it's transient and these backcountry airfields don't see much traffic and so noise is automatically kept to a reasonable limit. There have been studies with regards to wildlife and transient aircraft noise and it has been proven that it's not an issue for the surrounding wildlife.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Ward	Linda	N/A	Noise	I'm very concerned about the noise from ATV's, airplanes, helicopters, and drones which are incompatible with the wilderness experience and may disturb wildlife.	N/A
Corbato	Steve	Oregonians For Wild Utah	Noise	The sounds, sights, and disturbance from helicopters and other small aircraft have exploded in the Utah backcountry in recent years. Along with drones, visitors to many remote backcountry locations including in Wilderness Study Areas are increasingly disturbed by both commercial and private helicopter operators. BLM must proactively plan for this increase in helicopter use and establish clear, strong guidance and regulations to protect natural soundscapes, sensitive wildlife, and visitor experience.	N/A
Campbell	Todd	University of Tampa	Noise	The Grand Staircase has a diverse section of natural and scientific resources, making it extremely valuable, and in need of protection. The Grand Staircase is at risk of land from the Grand Staircase being offered to businesses/ corporations. If this occurs, the natural soundscapes and the air quality of the Grand Staircase will be at risk if the surrounding area becomes more urbanized, especially the park itself, because then the Grand Staircase will not be free from light pollution. Currently, the area is managed as an "outdoor laboratory" that mostly preserves the existing landscape and activities such as grazing. If this management plan changes to where companies/ industries get the land, then the company will face a decrease in air quality, resources, natural scenery, the dark night skies, educational artifacts of the Grand Staircase, natural soundscapes, and the overall natural quietness and ruralness of the area.	N/A
Popejoy	Mike	Grand Canyon Trust	Soils	Current and past management actions developed to protect soils and biological soil crust are not sufficient to advance the objectives of the Proclamation to protect these objects. Generally, the 2020 RMP allowed surface disturbance in areas of sensitive soils and biological soil crust as long as "mitigation" measures, "restoration", and NEPA analysis was completed on slopes between 10 and 30 degrees. (Projects above 30 degrees slope were prohibited.) However, mitigation and restoration of these objects has not been successful. Further, these measures do not address damage that occurs on slopes of lesser degrees where most projects take place. There must be protective measures that apply to those instances as well.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Soils	Issue 3: Restoration of Biological Soil Crusts Biological soil crusts, which are an identified object in the Proclamation, are significantly impaired and potential future management actions or allowances have the potential to continually degrade this important Monument object. The most recent AMS fails to fully identify impacted areas. The management plan needs to design and conduct inventories that accurately identify all areas with impaired biological crusts, determine the cause of the impairment, and implement remedies that will lead to the recovery of these biological crusts as rapidly as is practically possible. Without considering the abundant research surrounding biological soil crust management needs, BLM cannot have complied with its mandates to conserve, enhance, and protect Monument objects and values.	Appendix D - Alternative Components.pdf
Popejoy	Mike	Grand Canyon Trust	Soils	Rangeland health surveys conducted from 2000-2003 included line point intercept surveys. Surveying roughly 500 sites, BLM has data on the percent ground cover of biological crusts, bare ground, vegetation, and more. " This information identifies many specific sites where biological crusts are impaired. This can be compared with the expected unimpaired biological soil crusts on each site. The expected biological crust cover by percent of ground cover is identified in the AMS (Figures 5-5 and 5-6, Appendix B), but the AMS does not include information on the actual, diminished biological soil crust cover now found at these sites.	Appendix B - RNA Proposals.pdf
Popejoy	Mike	Grand Canyon Trust	Soils	The AMS provides a good summary of biological soil crust on GSENM but states that "...there are no known points of dispute regarding management of this resource...". We must point out that GSENM management has in fact heavily disputed the science-based management recommendations described above. For example, the Agency insists that surface-disturbing projects like vegetation treatments only destroy crusts temporarily and they will recover at some undetermined time in the future as the treatment is established. However, monitoring data in past treatments, even those that are decades old, continue to show no significant recovery of biological soil crusts if grazing is present. Much of the research on crust disturbance indicates that cyanobacteria may colonize ungrazed sites within a few years, but the later stage mosses and lichens that provide so much soil stability don't return for decades. As we have indicated elsewhere, data on Monument treatments show that they have low soil scores for rangeland health decades after treatment. Disturbance is an unalloyed disruption of crust organisms and their ecosystem functions, yet all the NEPA analysis performed for projects on GSENM assert, without empirical support, that these projects will be beneficial in the long-term. Further, the BLM has asserted that the vascular plants that will be seeded in will perform the nitrogen-fixing niche that has been destroyed by the removal of biological soil crust. This reasoning has also been dismissed by biocrust researchers. In short, these are significant points of dispute in management.	Appendix A - Figures & Tables.pdf
Popejoy	Mike	Grand Canyon Trust	Soils	There is a second set of data on the amount of bare ground in the Monument. Where bare ground percentages are high (over 50%), it is extremely likely that expected biological crusts are impaired. Wild Utah Project (WUP) filed a FOIA to acquire the field survey forms that Natural Resources Conservation Service used while completing the soil survey for this Monument. Using GIS, the location of each survey location was identified and combined to produce a map of bare ground, which was submitted to the BLM and is included with these comments as Figure 1 in Appendix A. " Herrick, J. E., Van Zee, J. W., Havstad, K. M., Burkett, L. M., & Whitford, W. G. (2005). Monitoring manual for grassland, shrubland and savanna ecosystems. Volume I: Quick Start. Volume II: Design, supplementary methods and interpretation. From 2014-2015, Grand Canyon Trust conducted biological soil crust surveys on 176 sites in the Monument. <sup>45</sup> We ask that data from NRCS, earlier BLM rangeland health surveys, and other surveys by NGOs on bare ground and biological soil crust coverage be included in the EIS. <sup>45</sup> Grand Canyon Trust. (2018). Grand Staircase-Escalante National Monument Biocrust Survey, 2014-2015. Unpublished report submitted to BLM.	Appendix A - Figures & Tables.pdf
Sjogren	Morgan	N/A	Soils	Restoration of Cryptobiotic Soil (aka Biocrusts) Biological soil crusts are an identified object in the GSENM monument proclamation. They are noticeably impacted and threatened within the monument, and future management plans must consider the protection of these delicate crusts. Telling the public to stay on a hiking trail and "don't bust the crust" is only a small portion of the solution to protect these fragile biocrusts. So much of these impacts come from livestock grazing and off-road vehicles. Areas with biocrusts in GSENM need to be surveyed for impacts and the origin of impact, while meaningful solutions need to be implemented rapidly to prevent further damage and promote recovery. To protect and restore biocrusts the BLM management plans need to concentrate hiking and ORV use to establishes trails and roadways, reduce grazing impacts to crusts (including letting the land rest between grazing periods and focusing grazing periods to moderately wetter times of the year when crusts recover better, and continue to collect data on biocrusts to improve monitoring and protective efforts.	40 Mile Gulch May 2020.pdf

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Berry	Scott	N/A	Soils	An agency affirmation that a scientific analysis of potential detrimental impacts to soils and biological crusts will be included in environmental analysis (NEPA) of proposed actions at GSENM.	RAD Management (2).pdf
Berry	Scott	N/A	Soils	Are potential impacts to soils and soil crusts quantitatively analyzed and considered in agency decision making related to grazing in GSENM?	RAD Management (2).pdf
Berry	Scott	N/A	Soils	Assemble a large data set consisting of historical and current photographs and remote sensing images portraying vegetative and soil structures within GSENM. Develop and apply machine learning methods (artificial neural network technology) to this data set to improve recognition of soil and biological crust features, and changes over time.	RAD Management (2).pdf
J	A	N/A	Soils	CRYPTOBIOTIC CRUST: More education on soil crust and soil crust management. Increase understanding internally and with the public. Ensure soils exhibit infiltration, permeability, and erosion rates appropriate for the soil type, climate, and landform. Avoid activities that impact function, health, and distribution of soil resources.	GSENM_20220923.pdf
Berry	Scott	N/A	Soils	Have methods been developed and implemented for monitoring air quality at select, distributed locations throughout GSENM?	RAD Management (2).pdf
Berry	Scott	N/A	Soils	Have methods been developed and implemented to quantitatively measure detrimental changes in air quality (particulate matter concentrations) resulting from damage to soils and biological crusts?	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Berry	Scott	N/A	Soils	Inventory and map soil types and the presence of biological crusts throughout GSENM, including this information in a GIS online mapping product describing features and values of ecounits located within GSENM, delineating those areas where sufficient data for description is currently unavailable.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Schwartz	Ephraim	N/A	Soils	Limit ATV travel in the Monument! The increased traffic in the Monument has degraded vast amounts of cryptogamic soil, destroyed the flora and fauna, eroded cliffs, and increased the danger to those moving responsibly through the area.	GSENM comments.docx
Berry	Scott	N/A	Soils	Prepare a scientific report, based on high quality science, describing the major causes of detrimental impacts to soils and crust, to include a best evidence forecast based on current climate science of foreseeable changes to these features in the future.	RAD Management (2).pdf
Chalfant	Brad	N/A	Soils	rotection of uplands and soils, specifically including biotic crusts and the health of Pinyon-Juniper forests both on and adjacent to the GSENM needs to be a priority, as watershed management is only effective when it begins at the top of the watershed. To be effective, the coordination and cooperation of adjacent landowners and land management agencies will be critical. Partnering is essential.	N/A
Not Provided	Grateful for the GSENM	N/A	Soils	Biological soil crusts are extremely important but often overlooked by BLM. These crusts fix and add nitrogen to soil, increasing its productivity. They bind and hold soil particles, preventing soil loss through wind and water erosion. They form mats that prevent or reduce the colonization and spread of cheatgrass and other invasive plants. They contribute to soil health which is the foundation for ecological health. They help to retain soil moisture and reduce evaporation losses. Unfortunately, these crusts are very slow growing and highly sensitive to ground disturbance. Human land uses especially cattle grazing over many years have destroyed much of these crusts in the GSENM.	N/A
Stanfield	Erik	Navajo Nation Heritage and Historic Preservation Department	Soils	Soils and Biological Soil Crusts: Grazing (and associated developments), ORV/OHV, and veg management have a high potential to negatively impact soils. It is important to maintain healthy stable soils as they have a close relationship as base to support culturally important plants, as support to the ecological balance and integrity of TCPs, and as protection for buried cultural resources.	N/A
Smith	Sindy	State of Utah, Public Lands Policy Coordinating Office	Soils	Soils and Biological Soil Crusts The State has briefly analyzed the benefits of proper grazing and its positive impacts on soil quality and soil health above. The State would encourage the BLM to fully analyze the positive impacts grazing can have on soils.	GSENM RMP Scoping Comments 27SEPT2022.pdf
McCoy	Melissa	U.S. EPA Region 8	Soils	Highly erodible soils are prevalent in the arid and semiarid rangelands found in the planning area and sedimentation may represent a significant source of pollutants in the planning area degrading water quality. Because sediment loading has already caused impairment of waterbodies in the planning area, and activities such as livestock grazing and use of off-highway vehicles results in surface disturbance and erosion, it is important the Draft EIS include information about these concerns. Portions of the planning area have also been disturbed by wildfire and road development making those areas more susceptible to erosion. Depending on a host of variables including soil characteristics, industrial operations, and topography, associated runoff from future surface disturbances could introduce sediments as well as salts, heavy metals, nutrients and other pollutants into surface waters. To disclose and mitigate the potential impacts of future soil disturbance, we recommend the Draft EIS include an estimate of erosion rates and resulting impacts to water quality for each alternative. For example, the Wyoming BLM's Bighorn Basin RMP Draft EIS estimated erosion rates based on projected amount of surface disturbance, types of surface disturbance, and general characteristics of the basin (erodible soils, slopes, etc.). Erosion rates were calculated using the Water Erosion Prediction Project model (WEPP), a web-based interface developed by the U.S. Department of Agriculture, Agricultural Research Service, which can be accessed at <a href="http://www.ars.usda.gov/Research/docs.htm?docid=18084&amp;pf=1">http://www.ars.usda.gov/Research/docs.htm?docid=18084&amp;pf=1</a> . We recommend BLM consider using this model or another appropriate model that would be applicable to this planning area. We also recommend the Draft EIS include specific design features and BMPs BLM would undertake within areas of highly erosive soils. These highly erosive soils include biological soil crusts, which are listed as a Monument object in the Proclamation. Biological soil crusts are important resources in the arid West because they fix nitrogen, store carbon, improve water filtration and soil stability, and provide resistance to the establishment of invasive grasses. According to the AMS they can comprise up to 70% of the planning area. We recommend mapping these irreplaceable soils and selecting management practices that would avoid or minimize disturbance of remaining biological soil crusts. Since biological soils can take up to 250 years to regenerate depending on the species composition, we recommend the Draft EIS discuss potential impacts to these sensitive soils and describe impacts to biological soil crusts as irreversible commitments of the resource. Where possible, we recommend BLM include a specific design feature that closes roads and trails and prohibits livestock grazing where they contribute to surface disturbance in areas with biological soil crusts. Where this is not possible, we recommend BLM use signage to educate users of the importance of biological soil crusts and prevent unauthorized use/user-created roads and trails to minimize disturbance.	FINAL EPA GSENM Scoping Letter 9-27-22.pdf



Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Campbell	Todd	University of Tampa	Soils	Soil and Cryptobiotic Crust - Lydia Francis Most ecological communities in the GSENM have low resilience and slow recovery to disturbances. This includes but is not limited to cryptobiotic soil crust. A cryptobiotic soil crust is the foundation of this arid ecosystem. It is created by living organisms such as algae, fungus, and cyanobacteria (photosynthesizing bacteria). Up to 70% of the living things in these areas are found in these crusts (Belnap 1995). These communities of microorganisms keep the soil dense and stable, which forms a crust at the surface of the soil (Anantani and Marathe 1974). These crusts are essential for resisting wind and water erosion. This special type of soil absorbs water significantly faster than normal soil, which helps impede evaporation in such an arid climate. Many of the surface dwellers on this crust, are essential to providing the nutrients that plants need to survive, like nitrogen (Belnap 1991). The older more undisturbed areas of crust are well developed and support large amounts of biodiversity. Many of the species on this undisturbed crust have never even been documented. This environment is a treasure trove of microbial scientific discovery. Belnap, J. (1991). Effects of wet and dry pollutants on the physiology and elemental accumulation of cryptobiotic crusts and selected rock lichens on the Colorado Plateau. National Park Service. Cryptobiotic soil crusts are extremely fragile. If a human takes a single step on to one of these areas of developed crust, the ecosystem can be destroyed. These ecosystems don't bounce back quickly either, they take 40 years or more to fully recover to the full biodiversity they were once at (Belnap 1995). When these communities die, it is much harder for plants to get their essential nutrients, and as we all know, once the plants can't survive, the animals won't either. Because of the fragility of this ecosystem, it's essential role in the environment, and the amount of potential it holds in the scientific community, it deserves strong consideration when reviewing the management plan. If these communities are destroyed, it will have disastrous impacts on the ecosystem. Belnap, J. (1995.). Potential role of cryptobiotic soil crusts in semiarid rangelands. Ecology, Management, and Restoration of Intermountain Annual Rangelands, United States Forest Service, 179-185. Grazing, human recreation, and off-road vehicles are the biggest contenders in this community's demise. The pressure from a single human footstep will cause destruction, now, imagine the impact of a car. It is because of this, that in the case of cryptobiotic crust all action alternative would be the preferred method of protecting this environment. Although, to keep GSENM a place for people to continue to visit, and learn about our natural world, Alternative E could also be a step in the right direction.	N/A
Todd	Robin	Maryland Ornithological Society	Minerals & Geol. Resources	Paleontological Values: More than 3,000 scientifically important fossil localities have been identified within GSENM. The protection of fossils was one of the primary reasons for establishing the monument, cited in Proclamations 6920 and 10286. All lands within the monument boundaries should be protected against fossil collection, except for authorized study and conservation by qualified institutions such as universities and natural history museums.	MOSlttr_GrandStaircaseScopingSep2022.pdf
Berry	Scott	N/A	Minerals & Geol. Resources	i.Strictly enforce existing law as it relates to operations determined to be grounded in a proof of "valid existing right".	RAD Management (2).pdf
Berry	Scott	N/A	Minerals & Geol. Resources	.Analyze and identify all pending mineral applications to determine which are based on a legally valid existing right. Deny all pending applications not based on a legally valid existing right within two years.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Berry	Scott	N/A	Minerals & Geol. Resources	Defer the development of regulations relating to approval of plans of operations and compliance with NEPA until the above described steps have been accomplished.	RAD Management (2).pdf
Berry	Scott	N/A	Minerals & Geol. Resources	Terminate and/or cancel pending applications for tar sands, production wells, and injections wells, where there has been non-compliance with the application requirements, within one year.	RAD Management (2).pdf
Berry	Scott	N/A	Minerals & Geol. Resources	With respect to the Montezuma Mine, prepare a scientific analysis of whether and to what degree investigation and / or cleanup will result in detrimental impacts to protected resources and values. Defer determination of cleanup methods until this analysis has been completed.	Berry GSENM RMP Scoping Comments 26 September 22.pdf
Campbell	Todd	University of Tampa	Minerals & Geol. Resources	Another great issue with the Grand Staircase is the mining effects of industries/ companies on noises and critters of the Grand Staircase. If mining were to take place here then that would deplete the natural resources underground and would destroy habitats for critters above ground and underground, because land would be getting destroyed that critters depend on. Another effect of mining is the noises and light it will create within the area. Mining requires heavy machines, which are noisy, and lights so people can see around the mines and see above ground in the Grand Staircase. This results in the area not being known for its dark skies and natural soundscapes anymore, because the area will be polluted with light and sounds, affecting the current ecosystem there. As nps.gov state, "The primary cause of light pollution is outdoor lights that emit light upwards or sideways. Any light that escapes upwards, except where a tree or building may me blocking it, will scatter throughout the atmosphere and brighten the night sky, thereby diminishing the view of it" (Luginbuhl, L., Walker C., and Wainscoat , R., 2009). This quote from these authors suggests that the biggest cause of light pollution is any light that faces upwards. A great example of this is the light used in construction or mining sights, because the lights that are used are massive bright lights that light up an entire area, to allow people to see as much as they need to. These massive lights used above and underground for mining will pollute the whole Grand Staircase. As quoted by the authors, the light will then escape upwards toward the atmosphere and therefore brightens the night sky, creating light pollution.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Proposed new alternative	There is not an alternative offered that we can totally support, but 7.2 of no change, or 7.8 re-written to include multiple uses would be preferable. Since this document is in response to scoping for comments, our first comment is ADD AN ALTERNATIVE "7.7 E" which allows MORE ACCESS to the greater area, and does not restrict and close opportunities in steps, but returns and KEEPS MULTIPLE USE as the major Management Plan.	N/A

Last Name	First Name	Organization Name	Comment Code Name	Comment Text	Attachment Name
Anon	Anon	Garfield County	Request Cooperating Status	It came to our attention as a result of the August 30, 2022 Zoom public scoping meeting, that no allowance had been made in the Project timeline for working with Garfield County and other appropriate RMP Cooperating Agencies in a confidential, nonpublic process to develop an Administrative Draft Environmental Impact Statement (ADEIS) in this matter. At that Zoom meeting, it took the persistence of an initial comment and then a follow-up comment from a Garfield County agent, to finally get Project Leadership to acknowledge the requirement of preparing an ADEIS as part of this overall NEPA project. Yet here we are over ten days later, and we have received no communication or other evidence indicating a revised project timeline to allow meaningful time to develop an ADEIS. As you know from applicable law, regulations, and agency guidance, the BLM's developing an ADEIS in good faith exclusive coordination with cooperating agencies is required. This must be a confidential process in which NGOs and other members of the public may not participate. The end-product must be an ADEIS, which at the end of the cooperating process, is then and only then released for public comment, and then a public draft EIS is prepared and released, etc. Again, we are concerned that thus far we see no action, movement or communication to indicate a plan or willingness to proceed as outlined above. We need a series of meetings exclusive to Project Leadership and Garfield County and the other Cooperators, and a written commitment from Project Leadership to abide by its responsibilities in working confidentially with the Cooperators to develop the ADEIS. And forthwith we need to see how the Project timeline has been revised and extended to formally include and allow for this important process. This is all part of the BLM's overall responsibility to COORDINATE with the State and applicable Counties (here Garfield and Kane Counties) in developing the GSENM RMP and other planning efforts.	N/A
Jackson	Thomas and Marilyn	Star Ranch LLC	Request Documents or Info	We, herewith, respectfully request a copy of any and all tabulated results regarding this issue.	N/A
Priscu	John	N/A			N/A

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# Appendix B

NOI

personal identifying information in a notice of protest or statement of reasons, you should be aware that the documents you submit—including your personal identifying information—may be made publicly available in their entirety at any time. While you can ask us to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

(Authority: 43 U.S.C. chapter 3)

**Joshua F. Alexander,**  
 Chief Cadastral Surveyor for North Dakota.  
 [FR Doc. 2022–16320 Filed 7–28–22; 8:45 am]  
 BILLING CODE 4310–DN–P

## DEPARTMENT OF THE INTERIOR

### Bureau of Land Management

**[L16100000.DQ0000.LXLUGSEM0000.**  
**LLUTPO1000]**

### Notice of Intent To Prepare a Resource Management Plan for the Grand Staircase-Escalante National Monument in Utah and an Associated Environmental Impact Statement

**AGENCY:** Bureau of Land Management, Interior.

**ACTION:** Notice of intent.

**SUMMARY:** In compliance with the National Environmental Policy Act of 1969, as amended (NEPA), the Federal Land Policy and Management Act of 1976, as amended (FLPMA), and Presidential Proclamation 10286, the Bureau of Land Management (BLM) Utah State Director intends to revise a Resource Management Plan (RMP) with an associated Environmental Impact Statement (EIS) for the Grand Staircase-Escalante National Monument (GSENM) and by this notice is announcing the beginning of the scoping period to solicit public comments and identify issues, is providing the planning criteria for public review, and is issuing a call for nominations for areas of critical environmental concern (ACECs). The RMP revision would replace the existing 2020 GSENM RMP and 2020 Kanab-Escalante Planning Area RMP.

**DATES:** The BLM requests the public submit comments concerning the scope of the analysis, potential alternatives, and identification of relevant information, studies, and ACEC nominations by September 27, 2022. To afford the BLM the opportunity to consider this information and ACEC nominations raised by commenters in the Draft RMP/EIS, please ensure your comments are received prior to the close of the 60-day scoping period or 15 days

after the last public meeting, whichever is later.

The BLM also requests the public submit comments on the planning criteria by the same date identified above. The planning criteria will be made available to the public within the first 30 days of the 60-day comment period to ensure the public has at least 30 days to comment on the planning criteria as required by the planning regulations at 43 CFR 1610.2(e). To afford the BLM the opportunity to consider this information and ACEC nominations raised by commenters in the Draft RMP/EIS, please ensure your comments are received prior to the close of the 60-day scoping period or 15 days after the last public meeting, whichever is later.

**ADDRESSES:** You may submit comments on issues and planning criteria related to the GSENM RMP and nominations of new ACECs by any of the following methods:

- **Website:** <https://eplanning.blm.gov/eplanning-ui/project/2020343/510>
- **Mail:** ATTN: GSENM RMP Project Manager, BLM Paria River District, 669 S Highway 89A, Kanab, UT 84741

Documents pertinent to this proposal may be examined online at <https://eplanning.blm.gov/eplanning-ui/project/2020343/510> and at the BLM Paria River District Office, 669 US–89A, Kanab, Utah 84741.

#### FOR FURTHER INFORMATION CONTACT:

Scott M. Whitesides, Project Manager, telephone 801–539–4054; address Bureau of Land Management Utah, 440 West 200 South Suite 500, Salt Lake City, Utah 84101; email [swhitesides@blm.gov](mailto:swhitesides@blm.gov). Contact Mr. Whitesides to have your name added to our mailing list. Individuals in the United States who are deaf, deafblind, hard of hearing, or have a speech disability may dial 711 (TTY, TDD, or TeleBraille) to access telecommunications relay services for contacting Mr. Whitesides. Individuals outside the United States should use the relay services offered within their country to make international calls to the point-of-contact in the United States.

**SUPPLEMENTARY INFORMATION:** This document provides notice that the BLM Utah State Director intends to prepare an RMP with an associated EIS for GSENM, announces the beginning of the scoping process, seeks public input on issues and relevant planning criteria, and invites the public to nominate ACECs. The planning area is located in Kane and Garfield counties and encompasses approximately 1.87 million acres of public land.

### Purpose and Need for the RMP

This RMP will provide a management framework, including goals, objectives, and management direction, to guide Monument management. Purposes and needs serve to frame issue identification, alternatives development, and effects analyses. The following purposes and desired outcomes are set forward explicitly in Presidential Proclamation 10286 or have been identified based on key present and historical GSENM management challenges. Planning for these desired outcomes will be crucial for development of an RMP that provides direction for addressing critical management challenges. Associated needs and challenges that the RMP will address are also summarized.

*1. Protect and restore the entirety of the large, remote, rugged, and markedly impenetrable landscapes, including dark skies and natural soundscapes. The Monument's fundamental values and objects include a rich mosaic of objects of natural, historic, and scientific interest.*

**Needs and challenges:** The immense scale and unspoiled naturalness of the Monument serves as a foundation for the rest of the Monument objects and values, including the diversity of ecotypes and extent and diversity of geological and paleontological resources, vegetation, and wildlife. Through the latter half of the 20th century, Utah's large extent of unspoiled natural, roadless areas was unique in the lower 48 states, ultimately providing for the 1996 GSENM proclamation. Monument visitation is steadily increasing, mostly due to recreational use. International and regional tourism is rising, and Utah is the state with the fastest growing population in the last decade (18.4%); in 2021 Utah's growth was 1.7% while the national population growth was 0.1%. These increases in human presence pose diverse challenges to preservation of resources (e.g., vegetation and soil impacts, loss of potential for human solitude, adverse effects on certain wildlife species, increases in noise). Effects such as these tend to be incremental, and gradual degradation of resources over time can easily occur, almost unnoticed, without adequate management sidebars, as well as overall management goals and objectives for the landscape as a whole. Avoidance of incremental degradation, so that the unique value of a largely unspoiled, natural landscape is retained given ongoing multiple uses, warrants substantial consideration in the planning process.



*2. Emphasize the Monument as a living, outdoor laboratory to be used for diverse and significant research and discovery related to the Monument's varied resources, objects, and values.*

*Needs and challenges:* The proclamation that originally designated the Monument in 1996 explained, "Even today, this unspoiled natural area remains a frontier, a quality that greatly enhances the monument's value for scientific study." However, the circumstances surrounding and within the Monument have changed substantially in the past 25 years (see purpose 1, above). There are substantial management challenges regarding how to maintain the unspoiled naturalness, which is essential to the Monument's purposes of science. Given the intensification of anthropogenic change in the world, natural refugia on the scale of this Monument are increasingly essential, rare, and hard to maintain. Areas such as the Monument are a cornerstone for scientific understanding of the past, and they are equally important for understanding changes and trends that allow us to appropriately plan for the future.

*3. Protect and restore biological resources including five life zones, a variety of habitats, and multiple eco-regions, due largely to the remoteness and substantial variation in elevation and topography of the Monument. The Monument contains unique and isolated plant communities, various floristic communities, relic and endemic plants, diverse wildlife including unique species of invertebrates, and a biodiversity of bees, as well as amphibians, birds, and mammals including mountain lion and desert bighorn sheep.*

*Needs and challenges:* Management of living individuals, populations, and interconnected communities and ecosystems must address a spectrum of needs and challenges. The Monument supports a range of ecotypes, as well as remnant, relic, and refugia populations across the landscape's substantial ranges of elevation and large geographic extent. Additionally, climate change and drought are outside the historic range of variability, affecting vegetation and thereby habitat and species. A key component of this planning effort will be identification of appropriate management for changing ecotypes and populations, especially given the scientific emphasis of this Monument.

*4. Protect and restore the historical and cultural understanding and appreciation related to Monument objects and values. These objects and values include an exceedingly high density of archaeological sites, modern*

*tribal uses, numerous historic routes and trails including Powell expedition routes and Mormon pioneer trails, historic inscriptions, ghost towns, cowboy line camps, and historic townsites.*

This topic focuses on restoration, retention, and education/appreciation of historic and cultural resources.

*Needs and challenges:* Protection, restoration, identification, and appreciation of such objects and values often requires substantial on-the-ground work, such as inventories, stabilization work, and sometimes development of educational interpretive materials. The RMP planning process should clarify how to select and prioritize such efforts, as well as consider the role of collaboration with outside entities and consultation with Tribal Nations that could both (1) further the aims of understanding and appreciation of these resources and (2) support the work of protection and restoration.

*5. Protect the Monument's varied geology and associated scenery with numerous unique areas and features and abundant, important paleontological resources. The entire landscape affords extraordinary visual landscapes and rich geologic and world-class paleontological resources. Reasonably accommodate challenges of remote paleontological research (e.g., transport of large fossils).*

*Needs and challenges:* Extensive scenic exploration can be accessed via paved roads, which serve as the main arteries through the Monument. Paved roads are augmented by several maintained, unpaved roads and some lesser dirt roads. Scenic geology itself, and the opportunity for visual appreciation, is relatively easy to preserve, while other uses of these resources, for example scientific study and personal collection, will require consideration during planning in order to provide for appropriate access, use, and protection. This is important in view of the scientific purposes of the Monument.

*6. Protect and restore world-class outdoor recreation opportunities, including hiking and backpacking, hunting, canyoneering, mountain biking, and horseback riding associated with a substantial, regional socioeconomic sector. Serve visitors via several visitor centers with diverse emphases, as well as provide basic facilities to ensure human health and safety (e.g., restrooms).*

*Needs and challenges:* The majority of the direct human visitation to the Monument is recreational. While not identified as an object in need of protection, Proclamation 10286

acknowledges the world class recreational opportunities within the monument that support a travel and tourism sector that is a source of economic opportunity for the region. However, high and increasing levels of recreational visitation are a top management challenge, and appropriate management of recreational use is a central concern to be addressed by the RMP. Large numbers of visitors can degrade visitor experience, raise human safety and health issues (such as related to human waste), and may harm ecologically sensitive areas and species. Challenges in finding a balance between Proclamation objectives and rapidly rising visitation levels means that use quotas or other mitigating management actions will be considered. Additionally, substantial step-down recreation planning is needed, such as for Special Recreation Management Areas. Yet such planning has never occurred on the Monument due to the substantial time and resources it requires.

*7. Protect and restore Monument objects and values within a multiple-use context. Monument lands have served multiple-use purposes since Anglo settlement in what is now the State of Utah. Such uses include, for example, grazing, hunting, and recreating. Monument lands were a combination of BLM and Utah School and Institutional Trust Lands Administration lands prior to Monument designation. Some of these lands were being used related to mining, rock hounding for alabaster, and other purposes.*

*Needs and challenges:* Since the time of Monument designation in 1996, controversy and disputes have existed among stakeholders regarding BLM's discretionary uses. Such controversy spans the spectrum of use: allowing for uses such as mining and livestock grazing while also supporting conservation and recreation uses and promoting strong preservation interests. Establishing management that ensures protection of monument objects and values and serves other monument purposes while accommodating other uses, as appropriate, is vital in this planning process.

### Preliminary Alternatives

The BLM will be analyzing alternatives that explore and evaluate different ways of achieving the purpose and need listed above. The alternatives will explore different outcomes to be addressed during this planning effort to understand the trade-offs of different land management approaches. The BLM welcomes comments on all preliminary

alternatives as well as suggestions for additional alternatives.

### Planning Criteria

The planning criteria guide the planning effort and lay the groundwork for effects analysis by identifying the preliminary issues and their analytical frameworks. Preliminary issues for the planning area have been identified by BLM personnel and from early engagement conducted for this planning effort with Federal, State, and local agencies; Tribes; and other stakeholders. The BLM has identified several preliminary issues for this planning effort's analysis and will provide them for public review as part of the planning criteria within the timeframe identified in **DATES** above. The planning criteria are available for public review and comment at the ePlanning website (see **ADDRESSES**).

### Summary of Expected Impacts

Consistent with protection of GSENM objects identified in Proclamation 10286, implementation of a new RMP may impact, either beneficially or adversely, resources and uses within GSENM, including recreation, livestock grazing, soils, water, vegetation, cultural and historic resources, paleontological resources, visual resources, designated areas, social and economic values, and other human and environmental resources. Planning decisions related to livestock grazing will also consider portions of Glen Canyon National Recreation Area because portions of livestock grazing allotments administered by the BLM cross these administrative boundaries.

### Schedule for the Decision-Making Process

The BLM will provide additional opportunities for public participation consistent with NEPA and land use planning processes, including a 90-day comment period on the Draft RMP/EIS and a concurrent 30-day public protest period and a 60-day Governor's consistency review on the Proposed RMP. The Draft RMP/EIS is anticipated to be available for public review in the spring of 2023, and the Proposed RMP/Final EIS is anticipated to be available for public protest of the Proposed RMP in late 2023 with an Approved RMP and Record of Decision in spring 2024.

### Public Scoping Process

This notice of intent initiates the scoping period and public review of the planning criteria, which guide the development and analysis of the Draft RMP/EIS.

The BLM will be holding a total of five scoping meetings. Two scoping meetings will be held virtually. Three scoping meetings will be conducted in-person: one in Kanab, one in Escalante, and a third meeting held at a yet-to-be-determined location. Details of all meetings will be announced once known. In compliance with Department of the Interior public health guidelines, the BLM may need to hold public meetings in a virtual format if county-level transmission of COVID-19 is "high" at the time of the public meetings. In that case, the BLM will hold five virtual public meetings.

The specific dates and locations of these scoping meetings will be announced at least 15 days in advance through local media, social media, and the ePlanning website (see **ADDRESSES**).

The ePlanning website (see **ADDRESSES**) also includes, or will include background information on GSENM, a planning process overview, preliminary planning criteria and interim management guidance. You may submit comments on issues, potential alternatives, relevant information and analyses, and the preliminary planning criteria in writing to the BLM at any public scoping meeting or to the BLM using one of the methods listed in the **ADDRESSES** section.

### ACECs

There are currently no designated ACECs within GSENM because the BLM determined under the previous planning efforts that the management provided through those RMPs were sufficient without warranting the designation of ACECs. No areas were identified during preplanning and early engagement for consideration as ACECs.

This notice invites the public to nominate areas for ACEC consideration. To assist the BLM in evaluating nominations for consideration in the Draft RMP/EIS, please provide supporting descriptive materials, maps, and evidence of the relevance and importance of resources or hazards by the close of the public scoping period to facilitate timely evaluation (see **DATES** and **ADDRESSES**). The BLM has identified the anticipated issues related to the consideration of ACECs in the planning criteria.

### Cooperating Agencies

Federal, State, and local agencies, along with Tribal Nations may request or be asked by the BLM to participate as a cooperating agency. At this time the BLM has identified the following potential cooperating agencies:

- National Park Service

- United States Fish and Wildlife Service
- USDA Forest Service
- Utah's Public Lands Policy Coordinating Office
- State of Utah School and Institutional Trust Lands Administration
- Utah State Historic Preservation Office
- Kane County, Utah
- Garfield County, Utah
- Washington County Water Conservancy District
- Kaibab Band of Paiute Indians
- Navajo Nation
- Paiute Indian Tribe of Utah
- Pueblo of Acoma
- Pueblo of San Felipe
- Pueblo of Tesuque
- Pueblo of Zuni
- San Juan Southern Paiute Tribe of Arizona
- Hopi Tribe
- Ute Indian Tribe of the Uintah and Ouray Reservation

### Responsible Official

The Utah State Director is the deciding official for this planning effort.

### Nature of Decision To Be Made

The nature of the decision to be made will be the State Director's selection of land use planning decisions for managing BLM-administered lands under the principles of multiple use and sustained yield in a manner that best addresses the purpose and need.

### Interdisciplinary Team

The BLM will use an interdisciplinary approach to develop the plan in order to consider the variety of resource issues and concerns identified. Specialists with expertise in the following disciplines will be involved in this planning effort: cultural resources, Native American concerns, paleontology, minerals, lands/access, recreation, special designations, wildlife, livestock grazing, soils, water resources, vegetation, rangeland management, fisheries, fire management, woodlands/forestry, socioeconomic, environmental justice, visual resources, night sky, soundscapes, air quality, and climate change.

### Additional Information

The BLM will identify, analyze, and consider mitigation to address the reasonably foreseeable impacts to resources from the proposed plan and all analyzed alternatives and, in accordance with 40 CFR 1502.14(f), include appropriate mitigation measures not already included in the proposed plan or alternatives. Mitigation may

include avoidance, minimization, rectification, reduction or elimination over time, and compensation; it may be considered at multiple scales, including the landscape scale.

The BLM will utilize and coordinate the NEPA and land use planning processes for this planning effort to help support compliance with applicable procedural requirements under the Endangered Species Act (16 U.S.C. 1536) and Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) as provided in 36 CFR 800.2(d)(3), including the public involvement requirements of Section 106. The information about historic and cultural resources and threatened and endangered species within the area potentially affected by the proposed plan will assist the BLM in identifying and evaluating impacts to such resources.

The BLM will consult with Indian Tribal Nations on a government-to-government basis in accordance with Executive Order 13175, BLM MS 1780, and other Departmental policies. Tribal concerns, including impacts on Indian trust assets and potential impacts on cultural resources, will be given due consideration. Federal, State, and local agencies, along with Indian Tribal Nations and other stakeholders that may be interested in or affected by the proposed GSENM RMP that the BLM is evaluating, are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate in the development of the environmental analysis as a cooperating agency. The BLM intends to hold a series of government-to-government consultation meetings. The BLM will send invitations to potentially affected Tribal Nations prior to the meetings. The BLM will provide additional opportunities for government-to-government consultation during the NEPA process.

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

(Authority: 40 CFR 1501.9 and 43 CFR 1610.2)

**Gregory Sheehan,**  
State Director.

[FR Doc. 2022-16296 Filed 7-28-22; 8:45 am]

BILLING CODE 4331-25-P

## INTERNATIONAL TRADE COMMISSION

[Investigation No. 337-TA-1244]

### Certain Batteries and Products Containing Same; Notice of a Commission Final Determination of Violation of Section 337; Issuance of a General Exclusion Order; Termination of Investigation

**AGENCY:** U.S. International Trade Commission.

**ACTION:** Notice.

**SUMMARY:** Notice is hereby given that the U.S. International Trade Commission has determined that there is a violation of Section 337 of the Tariff Act of 1930, as amended, in the above-captioned investigation. The Commission has issued a general exclusion order (“GEO”) barring entry of certain batteries and products containing same that infringe the patents asserted in this investigation. The Commission has terminated this investigation.

**FOR FURTHER INFORMATION CONTACT:** Michael Liberman, Esq., Office of the General Counsel, U.S. International Trade Commission, 500 E Street SW, Washington, DC 20436, telephone (202) 205-2392. Copies of non-confidential documents filed in connection with this investigation may be viewed on the Commission’s electronic docket (EDIS) at <https://edis.usitc.gov>. For help accessing EDIS, please email [EDIS3Help@usitc.gov](mailto:EDIS3Help@usitc.gov). General information concerning the Commission may also be obtained by accessing its internet server at <https://www.usitc.gov>. Hearing-impaired persons are advised that information on this matter can be obtained by contacting the Commission’s TDD terminal on (202) 205-1810.

**SUPPLEMENTARY INFORMATION:** The Commission instituted this investigation on February 5, 2021, under Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. 1337 (“Section 337”), based on a complaint filed by One World Technologies, Inc. (“One World”) and Techtronic Power Tools Technology Ltd. (“TTT”) (collectively, “Complainants”). 86 FR 8379–80 (Feb. 5, 2021). The complaint, as supplemented, alleges a violation of Section 337 based upon the importation into the United States, the sale for importation, or the sale within the United States after importation of certain batteries and products containing same by reason of infringement of the sole claims of U.S. Patent Nos. D579,868 (“the ‘868

patent”); D580,353 (“the ‘353 patent”); and D593,944 (“the ‘944 patent”). *Id.* at 8379. The complaint further alleges that a domestic industry exists. *Id.* The notice of investigation (“NOI”) names thirteen (13) respondents: Darui Development Limited (“Darui Development”); Dongguan Xinjitong Electronic Technology Co., Ltd. (“Dongguan Electronic”); Shenzhen Laipaili Electronics Co., Ltd.; Shenzhen MingYang Creation Electronic Co., Ltd.; Shenzhen Rich Hao Yuan Energy Technology Co., Ltd. (“Shenzhen Rich Hao”); Shenzhen Runsensheng Trading Co., Ltd.; Shenzhen Saen Trading Co., Ltd. (“Shenzhen Saen”); Shenzhen Shengruixiang E-Commerce Co., Ltd.; Shenzhen Uni-Sun Electronics Co., Ltd.; and Shenzhen Vmartego Electronic Commerce Co., Ltd. (collectively, the “Defaulted Respondents”); Shenzhen Liancheng Weiye Industrial Co., Ltd.; Shenzhen Ollop Technology Co. Ltd.; and Shenzhen Tuo Yu Technology Co., Ltd. *Id.* The Office of Unfair Import Investigations (“OUII”) is participating in this investigation. *Id.*

On May 17, 2021, Commission terminated the investigation based upon the withdrawal of the complaint with respect to respondents Shenzhen Liancheng Weiye Industrial Co., Ltd., Shenzhen Ollop Technology Co. Ltd., and Shenzhen Tuo Yu Technology Co., Ltd., after Complainants were unable to serve these respondents with copies of the Complaint and NOI. Order No. 7 (Apr. 21, 2021), *unreviewed by* Notice (May 17, 2021).

On April 20, 2021, Complainants filed a motion for an order to show cause why the remaining ten (10) named respondents (*i.e.*, the Defaulted Respondents) should not be found in default after failing to respond to the Complaint and NOI, which had been duly served upon them. On May 4, 2021, the motion was granted and an order to show cause was issued. Order No. 8 (May 4, 2021). On June 3, 2021, after they failed to respond to the order to show cause, ALJ issued an ID finding all ten Defaulted Respondents to be in default. Order No. 9 (June 3, 2021), *unreviewed by* Notice (June 23, 2021).

On June 21, 2021, Complainants moved for a summary determination of violation of Section 337 by the Defaulted Respondents and for a recommended determination recommending entry of a GEO and a bond at the rate of 100 percent during the Presidential review period. Complainants did not request issuance of any cease and desist orders.

On July 16, 2021, OUII filed a response to Complainants’ motion supporting a finding of summary

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