

PUBLIC SCOPING – SUMMARY REPORT

# Gold Butte National Monument Implementation Plan and Environmental Assessment



US Department of the Interior  
Bureau of Land Management  
Las Vegas Field Office  
Southern Nevada District

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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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## **ACRONYMS AND ABBREVIATIONS**

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Full Phrase

ACEC	area of critical environmental concern
ATV	all-terrain vehicle
BLM	Bureau of Land Management
EA	environmental assessment
GBNM	Gold Butte National Monument
GIS	geographic information systems
NEPA	National Environmental Policy Act
OHV	off-highway vehicle
RMP	resource management plan

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# Chapter I

## Introduction

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# Chapter I. Introduction

The Las Vegas Field Office of the Nevada Bureau of Land Management (BLM) intends to prepare an implementation plan for the Gold Butte National Monument (GBNM) in the northeastern portion of the Southern Nevada District. The GBNM was added as a unit of the National Landscape Conservation System by Presidential Proclamation 9559 on December 28, 2016, under 54 United States Code 320301 (known as the Antiquities Act). The presidential proclamation directs the Secretary of the Interior to prepare and maintain a management plan for the GBNM.

The implementation plan will consolidate the information and analyses that the BLM has collected over the years and will include measures for the protection of GBNM's resources, objects, and values. The preliminary areas of focus include, but are not limited to, cultural and historic resources, tribal resources, wildlife and special status species, vegetation resources, recreation, and lands and realty. As part of the planning process, the BLM will develop an environmental assessment (EA) to understand the effects that implementation-level actions may have on resources found within the GBNM.

Public involvement is a vital and legally required component of the National Environmental Policy Act (NEPA) process. It vests the public in the decision-making process and allows for full environmental disclosure. Guidance for implementing public involvement under NEPA is codified in 40 Code of Federal Regulations 1506.6.

Scoping is an open and early step in the NEPA process that helps the BLM to determine the scope of issues to be addressed and to identify significant issues related to the proposed action. Information collected during scoping may also be used to develop the alternatives to be analyzed in a NEPA document.

In accordance with the BLM's NEPA handbook, Section 9.1.3, the BLM must document the public scoping results. The BLM distributed a newsletter on October 31, 2022, announcing a 45-day public scoping period to solicit public comments and to identify issues for the implementation plan and EA. The comment period ended on December 14, 2022. This scoping report summarizes the scoping process and the comments received during the scoping period, including those provided during public scoping meetings.

## I.1 DESCRIPTION OF THE PUBLIC INVOLVEMENT PROCESS

The BLM established a virtual open house website at <https://www.virtualpublicmeeting.com/gold-butte-national-monument-ea> that was available 24 hours a day, 7 days a week during the scoping period. Additionally, the BLM held two virtual public meetings with the public, as shown in **Table I-1**. During these meetings, the BLM presented an overview of the GBNM planning process to date and resource issues previously identified. The BLM also provided an opportunity for questions and answers and verbal public input. The BLM recognizes that individuals invested considerable time and effort to submit input during this scoping period; as such, it developed a comment analysis method to ensure all input was considered.

**Table I-1: Virtual Public Meeting Summary**

Meeting Date	Meeting Time*	Number of Public/Stakeholder Attendees
November 29, 2022	6:00–8:00 p.m.	17
November 30, 2022	6:00–8:00 p.m.	10

\*Meeting times were Pacific standard time.

## I.2 NATURE OF INPUT RECEIVED AND THE SCOPING COMMENT ANALYSIS PROCESS

The BLM uses the public scoping comment analysis to compile and combine similar public feedback into a format that decision-makers can use to identify the topics to be evaluated and considered throughout the planning process. The public scoping comment analysis process includes five main components:

- Developing an issue coding structure
- Using a database for input management
- Reading and coding public input
- Interpreting and analyzing the inputs to identify themes
- Preparing comment summaries and issue statements

The BLM developed a coding structure to help sort public input into logical groups by topic. The coding structure was designed to capture all content, rather than to restrict or exclude any ideas.

The BLM used the comment analysis and response application database to manage all public input. The database stores the full text of all correspondence and allows each submitted comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondence and input received, sorting and reporting input by a topic, and demographic information regarding the input sources.

## I.3 METHODOLOGY

In this report, a comment submission refers to a unique letter, email, website entry, or verbal public input received by the BLM during the scoping period. From the 58 comment submissions received, the BLM identified a total of 229 discrete comments (see **Appendix A**). Each comment was assigned a code to identify its general content and to group similar topics. The BLM considered all comments and will use them to identify issues to be analyzed in the GBNM implementation plan and EA.

Public comments received during the scoping period do one or more of the following:

- Raise issues the BLM has not considered or reinforce issues the BLM has already identified, to inform the development of project alternatives
- 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

All identified public comments were grouped by similar topics and are summarized in **Chapter 2**.



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# Chapter 2

Summary of Public Comments

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# Chapter 2. Summary of Public Comments

The BLM received most comment submissions through the NEPA register website: <https://eplanning.blm.gov/eplanning-ui/project/2021951/510> (Table 2-1). The BLM also received comment submissions through the project email ([BLM\\_NV\\_LVFO\\_GoldButte@blm.gov](mailto:BLM_NV_LVFO_GoldButte@blm.gov)), verbal input during the virtual public meetings, and online submissions via the GBNM virtual open house website (<https://www.virtualpublicmeeting.com/gold-butte-national-monument-ea>).

**Table 2-1: Submissions by Delivery Type**

Delivery Type	Number of Submissions
NEPA register website	32
Email	14
Virtual open house website	2
Virtual public meetings (verbal)	10
<b>Total</b>	<b>58</b>

Table 2-2 summarizes the distribution of comments by issue category. These issue categories are outlined further in Section 2.1, which presents summaries of the comments included in Appendix A.

**Table 2-2: Number of Comments by Issue Category**

Issue Category	Number of Individual Comments	Percentage of Total Comments Coded*
<b>NEPA</b>	—	—
Public outreach	6	2.6
Cooperating agencies	2	<1
Tribal consultation	1	<1
Purpose and need	6	2.6
Alternatives (general)	10	4.4
Alternative A (No Action)	3	1.3
Alternative B (Proposed Action)	4	1.8
Alternative C (Increased Recreation Use)	3	1.3
Alternative D (Management for Use and Resource Protection)	12	5.2
Best available information and baseline data	16	7.0
Geographic information systems (GIS) data and analysis	2	<1
Cumulative impacts	1	<1
Mitigation and monitoring	2	<1
Level of NEPA analysis needed	6	2.6
<b>Resources, uses, and special designations</b>	—	—
Air quality and climate	2	<1
Soil resources	2	<1
Water resources	6	2.6
Fire management	1	<1
Socioeconomics and environmental justice	4	1.8
Cultural resources	2	<1
Tribal interests	2	<1

<b>Issue Category</b>	<b>Number of Individual Comments</b>	<b>Percentage of Total Comments Coded*</b>
Public health and safety	4	1.8
Paleontological resources	1	<1
Threatened, endangered, and sensitive species	2	<1
Vegetation	6	2.6
Wildlife	1	<1
Recreation	2	<1
Camping	5	2.2
Facilities	17	7.4
Hiking	2	<1
Horseback riding	4	1.8
Mountain biking	1	<1
Off-highway vehicle (OHV) use	2	<1
Shooting	2	<1
Special recreation permits	6	2.6
Access	11	4.8
Road maintenance	13	5.7
Route designations	5	2.2
Travel management plan	2	<1
Unauthorized routes	1	<1
Lands and realty	1	<1
Rangeland management	1	<1
Grazing	32	14.0
Wild horses and burros	6	2.6
Special designations	4	1.8
Lands with wilderness characteristics	3	1.3
Visual resources and dark skies	2	<1
<b>Total</b>	<b>229</b>	<b>100</b>

\*All percentages are rounded to the nearest one-tenth of 1 percent.

## 2.1 SUMMARY OF SCOPING COMMENTS

The issue statements presented below are preliminary and are based on comment submissions received during the scoping period. For each issue, the BLM has developed a summary of the comments received.

### 2.1.1 NEPA

#### **Public Outreach**

*Issue: How will the BLM ensure there is widespread and accessible outreach to GBNM's various stakeholders and interested parties?*

#### Comment Summary

- Multiple commenters expressed concerns about how the BLM will communicate with the public. One commenter requested that the BLM ensure important information is translated to Spanish and other local native languages, such as that of the Moapa Paiute.
- Other commenters requested that the BLM include multiple interest parties that use the monument for activities such as hiking, OHV use, and mountain biking. The commenters also requested that the BLM create nongovernmental advisory committees based on a range of stakeholder groups, including preservation, economic, and recreation groups. A commenter

suggested the BLM use volunteer groups, such as Friends of Gold Butte and the Wasatch Mountain Club, in both the planning process and for maintenance of GBNM.

### **Cooperating Agencies**

*Issue: What agencies and stakeholders will the BLM coordinate with in this NEPA process?*

#### Comment Summary

- One commenter requested that the BLM work with Virgin Valley Water District as a cooperating agency.
- Another commenter recommended the BLM coordinate with nonprofit groups such as Friends of Nevada Wilderness, Friends of Gold Butte, and Nevada Site Stewards.

### **Tribal Consultation**

*Issue: To what extent does the BLM plan to consult with local tribal entities?*

#### Comment Summary

- One commenter implored the BLM to take all reasonable steps to consult, collaborate, and partner with tribal nations in addition to local government agencies and the public. The commenter stated that the traditional knowledge and understanding of the region that constitutes GBNM is inherent to local tribal communities and cultures. Tribal knowledge and understanding are invaluable as the BLM moves forward with this NEPA process and the development of the implementation plan.

### **Purpose and Need**

*Issue: Will the BLM consider adjusting the draft purpose and need for the EA?*

#### Comment Summary

- One commenter argued that although recreation use is an important facet of the GBNM's management, it is not a resource or monument object to be conserved. The commenter stated that it would be better to consider recreational uses as important, but discretionary, rather than as one of the monument's key resources.
- Another commenter requested that the BLM simplify the purpose and need to state that the purpose is to protect monument objects and resources and the need is to respond to the increasing threats to those objects and resources.
- Another commenter requested that the purpose and need include text regarding the protection and recovery of the desert tortoise.
- Another commenter requested that the purpose and need include text regarding illegal grazing in the monument.
- Another commenter argued that the current purpose and need are insufficient because the BLM should be preparing a full monument management plan and not an implementation plan.

**Alternatives**

*Issue: What additional alternatives, or changes to the draft alternatives, will the BLM consider as the implementation plan and EA are prepared?*

**Comment Summary**

- One commenter requested that the BLM prepare an alternative that considers the socioeconomic trends in the communities near GBNM.
- Another commenter requested the BLM update the alternatives to recognize the recreational values of OHV use opportunities in GBNM.
- Another commenter stated that the BLM should only evaluate alternatives that provide protection for monument objects, because those alternatives are the only ones that are likely to be chosen.
- Another commenter recommended that the alternatives include reference to Governor's Executive Order 2021-18, which called for the preparation of the Nevada Habitat Conservation Framework and Wildlife Connectivity Plan. The commenter made the argument that this executive order would dovetail with the overall purpose of establishing GBNM, the previous designations of areas of critical environmental concern (ACECs) overlapping the Gold Butte-Pakoon critical habitat for desert tortoise recovery, the designated wilderness and lands with wilderness characteristics, and Nevada Department of Wildlife and BLM coordination in the management of regional wildlife populations and habitats, including desert bighorn sheep historical habitat.
- Other commenters suggested that the BLM combine some of the draft alternatives to achieve a more comprehensive final product. One commenter stated that there should be a dual management alternative that combines Alternative B and Alternative C to plan for preservation as well as sustainable recreation. Other commenters recommended applying draft Alternatives B, C, and D to different zones and corridors in the monument; the BLM would manage the northern zone for higher recreational use (Alternative B and Alternative C), a middle zone would be managed for resource sustainability (Alternative B), and the BLM would manage a southern zone for limited use and resource protection (Alternative D). A commenter made the argument that applying a single alternative to the whole monument does not make sense because the BLM needs to consider multiple contexts.

**Alternative A (No Action)**

*Issue: How does the BLM view the practicality of Alternative A?*

**Comment Summary**

- Commenters disagreed on the viability of Alternative A, the No Action Alternative. Multiple commenters argued that the alternative was not a viable option; this is because it would not result in the protection of monument objects and values, or the preparation and maintenance of a management plan, as directed by Proclamation 9559.
- Another commenter supported Alternative A and stated that no changes are needed.

### **Alternative B (Proposed Action)**

*Issue: Will the BLM revise the draft Alternative B?*

#### Comment Summary

- In general, most commenters agreed that Alternative B should indeed be the proposed action. Commenters appreciated that improvements to roads and signage are needed to balance visitation and the preservation of important monument objects. Commenters generally supported the goal of balancing recreation and preservation.
- One commenter requested that the BLM manage the monument's unpaved travel corridors under Alternative B, specifically the northern and middle sections. These include dirt roads in the Virgin Peak area, such as Fisherman Flats, and dirt roads between Whitney Pocket and Gold Butte Townsite (including Little Finland). These areas receive considerable use, but mostly along roads. Therefore, this commenter requested that the BLM manage the travel corridors.

### **Alternative C (Increased Recreation Use)**

*Issue: Will the BLM revise the draft Alternative C?*

#### Comment Summary

- One commenter stated that Alternative C was most in line with how the commenter would like the BLM to manage the monument, maximizing recreation opportunities while minimizing ecological impacts.
- Another commenter argued that Alternative C is not consistent with Proclamation 9559 because increased recreation will harm monument objects and values; therefore, Alternative C should not be considered.
- Another commenter suggested that only the northern travel corridors (such as Paved Gold Butte Road, the Whitney Pocket area, the Falling Man area, and the Cabin Canyon area) should be managed under Alternative C. Because these areas are the most visited, the commenter stated that monument objects and values would be best protected by improved recreation facilities.

### **Alternative D (Management for Use and Resource Protection)**

*Issue: Will the BLM revise the draft Alternative D?*

#### Comment Summary

- Multiple commenters stated that they preferred Alternative D, which prioritizes resource protection, compared with the other draft alternatives. Commenters stated that Alternative D would do the best job of protecting monument objects and values and would confidently uphold the BLM's legal obligation to do so. Commenters referred to drought and climate change threats as primary reasons for supporting Alternative D. The majority of commenters suggested that the BLM manage GBNM with maximum attention to preservation of natural and cultural resources.
- Commenters that believed different proposed alternatives should be applied to different zones within the monument recommended that Alternative D be applied to areas containing lands with wilderness characteristics.
- Another commenter supported Alternative D but stated that Alternative D would be impractical because of the need to better manage increased visitation.

**Best Available Information and Baseline Data**

Various commenters provided suggested best available science and information literature for the BLM to review and consider while preparing the implementation plan and EA. The full citations of these references are provided in **Appendix B**.

Various commenters also provided the following comments previously submitted to the BLM for consideration:

- Friends of Nevada Wilderness, submitted January 30, 2015, and February 2, 2018
- Sierra Club – Toiyabe Chapter, submitted January 24, 2018
- Friends of Gold Butte, submitted February 2, 2018
- Red Rock Audubon Society, submitted February 2, 2018
- Center for Biological Diversity, submitted February 2, 2018
- The Wilderness Society et al., submitted February 2, 2018
- Nevadans for Cultural Preservation, submitted March 2, 2018
- Friends of Gold Butte et al., submitted March 23, 2018

**GIS Data and Analysis**

*Issue: What maps will be included in the EA?*

Comment Summary

- One commenter requested that the EA include maps of all open and closed routes. The commenter requested that the BLM prepare a schedule indicating when all open routes will be signed and when all closed routes will be eradicated through vertical mulching.
- This commenter also requested the EA include maps showing ACECs, desert tortoise critical habitat, other desert tortoise conservation areas that include linkages, and modeled desert tortoise populations; the maps should demonstrate how the route network was designed to minimize the impacts on essential conservation areas.
- This commenter also requested that the EA include maps showing locations of grazing allotments and burro herd management areas, if any, relative to desert tortoise populations and conservation areas.

**Cumulative Impacts**

*Issue: How will the BLM analyze cumulative impacts in the EA?*

Comment Summary

- One commenter requested that the EA provide a complete cumulative effects analysis by following the eight principles of the Council on Environmental Quality's Considering Cumulative Effects under the National Environmental Policy Act. The commenter requested that the EA include an analysis of cumulative impacts on the desert tortoise, address the sustainability of desert tortoise populations, and include mitigation, monitoring, and adaptive management plans that protect desert tortoises and their habitats during the authorization of any activities by the BLM.



### **Mitigation and Monitoring**

*Issue: How will the BLM ensure proper mitigation and monitoring occur for actions analyzed in the EA?*

#### Comment Summary

- One commenter requested that the EA provide a robust, scientifically based monitoring plan that documents baseline desert tortoise populations and human impacts on desert tortoise habitat to compare with future monitoring data.
- Another commenter requested that the BLM allocate adequate personnel to monitor users and encourage responsible visitor behavior in the monument.

### **Level of NEPA Analysis Needed**

*Issue: Why is the BLM preparing an implementation plan rather than a monument management plan?*

#### Comment Summary

- Multiple commenters expressed concern that an implementation plan will be inadequate; instead, the BLM should prepare a full monument management plan. Commenters referred to Proclamation 9559 to justify their argument, noting that it directs the BLM to “prepare and maintain a management plan for the monument.” Commenters stated that the current 1998 Las Vegas Resource Management Plan (RMP) is outdated; therefore, an implementation plan will not be sufficient to protect monument objects and values.

## **2.1.2 Resources, Uses, and Special Designations**

### **Air Quality and Climate**

*Issue: How will the BLM properly address the threats of climate change to GBNM?*

#### Comment Summary

- Multiple commenters were concerned about how the BLM will address the impacts of climate change on GBNM. Commenters stated that because it is already an arid landscape, climate change may exacerbate issues that currently exist, such as drought, which will disproportionately impact desert habitats. Commenters recommended that the EA properly address and plan for this threat to the local ecosystem and identify related uses that may compound climate-related problems, such as livestock grazing and recreation uses.

### **Soil Resources**

*Issue: How will the BLM ensure the protection of cryptobiotic soil crusts in GBNM?*

#### Comment Summary

- Multiple commenters expressed concern that cryptobiotic soil crusts do not get the adequate level of preservation they require based on their extensive, and often overlooked, benefits. Commenters made the argument that cryptobiotic soil crusts are a key component of ecosystem health; therefore, the EA should include proper guidance for soil crust protection. One commenter suggested that by adhering to Alternative B, this can be accomplished.

### **Water Resources**

*Issue: How will the BLM plan for drought conditions?*

#### Comment Summary

- Multiple commenters expressed concerns that increased drought levels should be a dominant component of planning for GBNM through this NEPA process. Commenters stated that lengthy drought events may make wildfires, like the 2005 Southern Nevada Complex Fire, more common. Commenters noted that due to drought issues, coupled with damage related to increased visitation, native plants and wildlife will be at increased risk due to limited water resources.

*Issue: How will the BLM ensure the protection of water resources in GBNM?*

#### Comment Summary

- One commenter suggested that the BLM assert reserved federal water rights to protect monument springs and seeps from human use, such as diversions.
- Another commenter stated that existing barriers protecting springs should be maintained so that spring areas are not driven on or trampled.
- Another commenter requested that the implementation plan include restoration of riparian areas that have been damaged by cattle and burros.
- Another commenter stated that the BLM should ensure it properly complies with all Nevada water laws and water rights.

### **Fire Management**

*Issue: How will the BLM reduce the wildfire risk within GBNM?*

#### Comment Summary

- One commenter provided recommendations for how the BLM should approach wildfire treatment in the monument. The commenter stated that though vegetation treatments can reduce the wildfire risk, they might also compromise scenery integrity or nonmotorized recreation opportunities. However, the commenter did concede that issues related to vegetation treatment pale in comparison with damage caused by wildfires. Therefore, the commenter suggested that the BLM make a balance-of-harm or benefit determination for resource management activities such as vegetation treatments. The commenter suggested that the BLM use non-fire techniques, such as mechanical thinning, as often as possible to best preserve wildlife, trails, and cultural sites. The commenter also suggested that wilderness designation can be harmful since vegetation treatments are not as effective due to equipment restrictions in designated wilderness areas.

### **Socioeconomics and Environmental Justice**

*Issue: How will the BLM analyze socioeconomic impacts in the EA?*

#### Comment Summary

- Multiple commenters were concerned that the monument will have negative impacts on local communities if it becomes a major tourist destination. One commenter referred to *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 as evidence. The commenter argued that land conservation fuels wealth inequality in western towns; the EA should address this.

- Another commenter suggested that the monument could become an invaluable asset to the local economy through tourism. This commenter saw the monument as an amenity and positive force for local communities.
- Another commenter stated that the monument could have a negative economic impact on those that use the area for OHV riding or that provide services for OHV recreationists. The commenter recommended the BLM include these effects in the socioeconomic analysis, especially when considering GBNM management under Alternative D.

### **Cultural Resources**

*Issue: How will the BLM analyze the impacts of the implementation plan on cultural resources in GBNM?*

#### Comment Summary

- Commenters provided recommendations for how the BLM should manage sensitive cultural sites in GBNM. Commenters suggested the BLM not publicly document sites important to Indigenous communities, with the exception of the Newspaper Rock and 21 Goats area. Commenters stated that the BLM should make decisions regarding developing any cultural sites in consultation with local tribes; development should generally be avoided so that sensitive areas are preserved.
- One commenter requested that in heavily visited locations, such as Newspaper Rock, the BLM develop formal foot trails with directional and interpretive signage (including Leave No Trace guidance) to mitigate degradation related to heavy visitation.

### **Tribal Interests**

*Issue: How does the BLM plan to provide for tribal interests regarding actions in GBNM?*

#### Comment Summary

- One commenter implored the BLM to include provisions in the implementation plan to preserve petroglyphs, pictographs, and other Native American artifacts from vandalism or accidental damage.
- Another commenter suggested that the BLM adopt a process that places the Moapa Band and Las Vegas Paiute Tribes in a position of influence to develop components of the implementation plan. The commenter would like direct conversations with tribal leaders and ongoing tribal involvement throughout the plan's development and implementation.

### **Public Health and Safety**

*Issue: How does the BLM plan to provide for public health and safety in GBNM, including a law enforcement presence?*

#### Comment Summary

- Commenters suggested that the implementation plan include strategies for improving the law enforcement presence, including hiring permanent rangers and staff to better monitor use and potential illegal activity. Additionally, commenters suggested the BLM construct a viewing platform at Devil's Throat to reduce the occurrence of people crossing fences to get a better

view. Commenters also recommended adding more directional and informational signage to help with navigating GBNM.

### **Paleontological Resources**

*Issue: How does the BLM plan to protect paleontological resources in GBNM?*

#### Comment Summary

- One commenter recommended that the BLM devote efforts to protecting the fossil trackways that predate dinosaurs; these trackways were recently discovered in the GBNM area.

### **Threatened, Endangered, and Sensitive Species**

*Issue: How will the BLM ensure the protection of threatened, endangered, and sensitive species in GBNM?*

#### Comment Summary

- Multiple commenters expressed concerns about the protection of important and sensitive species found in the monument. One commenter specifically focused on the desert tortoise, requesting that the BLM limit recreation use in areas of critical desert tortoise habitat. The commenter referred to designations of recreation areas in California administered by the BLM that allowed OHV use in desert tortoise habitats. The commenter hoped the Nevada BLM will be more thoughtful in protecting the desert tortoises found in GBNM.
- Another commenter suggested that the BLM install new fencing to protect sensitive plant and animal species, such as relict leopard frogs, from trampling by nonnative animals, such as cattle and burros.

### **Vegetation**

*Issue: How does the BLM plan to protect native vegetation and control invasive plant species?*

#### Comment Summary

- Multiple commenters expressed concerns about damage to the monument landscape caused by invasive plants found in or near GBNM. Commenters recommended that the BLM implement an aggressive plan to control invasive species in the monument.
- Other commenters suggested replanting native species after treating areas for invasive species. One commenter recommended mapping and studying high-quality habitat for important native vegetation communities. The commenter stated that this would allow the BLM to plan more proactively to protect important habitats from human influence and disturbance so that sensitive vegetation can have a better chance of long-term survival. The commenter also suggested closing roads to protect habitats from OHV recreational use.

### **Wildlife**

*Issue: How will the BLM address the impact of ravens on desert tortoise populations?*

#### Comment Summary

- One commenter recommended reducing raven populations by applying oil to their eggs. Because ravens eat desert tortoise hatchlings and juveniles, the commenter stated that this would benefit desert tortoise populations.

### **Recreation**

*Issue: How will the BLM manage recreation in GBNM?*

#### Comment Summary

- Commenters requested that the implementation plan and EA address and analyze what capacity of sustainable recreation the monument can reasonably accommodate.
- One commenter stated that plans, including a suggested visitor use management plan, should use recreation capacity to determine management decisions. The commenter also stated that limits on use should be set when the determined capacity is reached.
- Another commenter expressed an opinion that public lands should remain public. The commenter advised the BLM not to allow lands to become private within GBNM, so visitors can access GBNM's resources in perpetuity.

### **Camping**

*Issue: To what extent does the BLM plan to develop or enhance camping opportunities within GBNM?*

#### Comment Summary

- Multiple commenters had specific suggestions for how the BLM could improve camping opportunities and experiences through this implementation plan. Commenters noted that existing formal campsites are currently overwhelmed during peak times. This causes traffic, noise, and lights to become nuisances and even safety risks for other visitors.
- One commenter requested that some future campsites be free of generators; the commenter also requested that popular areas, such as the Whitney Pocket area, use a reservation system.
- Multiple commenters stated that they would like more campsites with limited amenities, such as metal fire pits and picnic tables, in areas such as Whitney Pocket, Gold Butte Townsite, Little Finland, and Cabin Canyon.
- One commenter lamented that dispersed camping opportunities are disappearing due to route restrictions, despite the growing popularity of outdoor recreation.
- Another commenter stated that the monument's southern sections should not be developed; they should only allow primitive-style camping. Other commenters argued that limited formal campsites make it difficult for the BLM to manage camping impacts on the landscape because they are so dispersed and hard to track. These commenters asserted that the expansion of limited amenity campgrounds would allow for use to be more controlled and managed, and impacts could be mitigated.

### **Facilities**

*Issue: What kinds of facilities does the BLM plan to construct in or near GBNM to achieve more sanitation, less waste, efficient and safe travel, and a better visitor experience overall?*

#### Comment Summary

- Multiple commenters specified that they want more toilets and waste facilities at popular sites, such as Whitney Pocket, Devils Throat, Newspaper Rock, Little Finland, Seven Keyholes, Gold Butte Townsite, and Cabin Canyon, to handle increased visitation.
- One commenter suggested that the BLM place a dumpster in the parking lot where Gold Butte Road intersects Interstate 70, since Leave No Trace outreach alone is inadequate at keeping litter from appearing in the monument. Another commenter disagreed about the need for

dumpsters, stating that if there is not staff to clean them regularly, they could become hazardous, overfilled, and counterproductive to waste management goals.

- Multiple commenters stated that they would like more information signs and kiosks, similar to those which currently exists at one of the entrances to GBNM, to inform visitors of Leave No Trace principles and safety information. Other commenters requested that the BLM install parking and staging signs at areas being used as such; they also requested that the BLM add barriers to restrict expansion of informal parking areas. One commenter noted that more parking is needed in general at popular trailheads to accommodate hikers, horse trailers, and OHV users.
- One commenter suggested developing a signage plan for the monument. Another commenter recommended that any interpretive signage should include information on wildfire risks associated with off-road driving.
- Another commenter stated the desire for the BLM to complete transportation improvements and development to maintain the philosophy of GBNM's wild and remote nature; the commenter believed that enhanced transportation should help visitors reach their destinations while still staying on maintained roads and preserving lands with wilderness characteristics.
- Other commenters expressed interest in a future visitor center that could provide more education and recreation information for visitors. Some recommendations for where a visitor center may be located include along Gold Butte Road past the horse ranches overlooking the Virgin River or in the city of Mesquite. Both commenters recommended locations outside the monument's boundaries, with one stating that a location outside GBNM would limit the environmental damage that construction in the monument would cause. Commenters noted that they desire exhibits about the backcountry's primitive nature, Leave No Trace principles, interpretive resources, and basic safety information. One commenter suggested that the BLM potentially have signs and brochures for cyclists, so they stay on designated roads and are aware of hazards.
- Multiple commenters stated that it would be useful for the BLM to partner with volunteer organizations in the area to maintain facilities and camping areas, as well as to help install signs. One commenter from a volunteer group suggested that the BLM cap all signposts to protect birds.

### **Hiking**

*Issue: How will the BLM maintain access throughout GBNM while preventing damage to resources?*

#### Comment Summary

- One commenter suggested that all foot trails be designated and have directional, interpretive, and educational signs as long as the signs do not interfere with backcountry experiences; the commenter also suggested the signs be hardened to mitigate degradation.
- Another commenter recommended that the BLM work with the Trail Access Project to adopt user-created trails that do not damage the resources in the monument, to maintain designated trails to prevent resource damage, and to create and maintain multiple miles of trails that all users can access.

### **Horseback Riding**

*Issue: To what extent will the BLM develop or enhance recreational facilities and trails for horseback riding?*

#### Comment Summary

- Multiple commenters requested the BLM construct a staging area in the Whitney Pocket area with trailer parking, vault toilets, trash receptacles, and information kiosks with reasonable separation from non-equestrian staging areas.
- One commenter had concerns regarding overuse of open spaces by recreationists, and suggested the BLM implement encouragement for equestrian riders on designated trails in popular areas. This commenter also requested the BLM add equestrian trails leading to popular photograph sites in the Whitney Pocket and Amber Cat-Doodlebug Canyons areas.
- Another commenter opposed entry via permit only and requested the monument remain open and accessible to equine use. This commenter also requested updated equine facilities to make equine camping more accessible.
- Another commenter requested that equestrian camping areas include corrals, hitching rails, and similar amenities.

### **Mountain Biking**

*Issue: How will the BLM address growing recreation uses and adapt to allow for more mountain biking trails?*

#### Comment Summary

- One commenter suggested that the BLM maintain and manage the growing recreational uses in the area. This commenter also suggested that the mining roads above White Rock Trailhead in Cabin Canyon could be used for designated mountain biking areas with hardened trails.

### **Off-highway Vehicle Use**

*Issue: How will the BLM manage OHV use within GBNM to reduce impacts on sensitive desert habitats?*

#### Comment Summary

- Multiple commenters had concerns regarding OHV traffic, specifically larger groups, creating disturbances off designated travel routes.

### **Shooting**

*Issue: How will the BLM manage impacts from recreational shooting?*

#### Comment Summary

- Multiple commenters had concerns with recreational shooters not using appropriate target material, not cleaning up waste, being irresponsible about fire danger, and toxic waste from lead shot; the commenters suggested prohibiting target shooting in the monument for these reasons.

### **Special Recreation Permits**

*Issue: In what ways will the BLM implement special recreation permits to continue to protect objects and values within GBNM?*

#### Comment Summary

- Multiple commenters suggested the BLM implement a special recreation permit system for commercial and large group, noncommercial activities to protect the monument's objects and values by limiting group sizes.

- One commenter suggested the BLM specifically define what large groups entail and require a special recreation permit. This commenter expressed concerns with large groups overwhelming trailhead parking areas, the potential for damaging sensitive desert habitats, the potential of blocking other users from parking, and groups of hikers creating new trails.
- Another commenter suggested the BLM require permits for groups of more than five vehicles.

### **Access**

*Issue: How will the BLM protect resources while also providing monument visitors, specifically those with disabilities, access to those resources?*

#### Comment Summary

- Multiple commenters had concerns regarding access for people with disabilities. They recommended the BLM take into consideration persons with disabilities when making decisions about whether to close motorized travel routes.
- One commenter recommended providing road access for four-wheel-drive vehicles to the mouth of Seven Keyholes for better access for all, including those unable to hike into this area.
- Another commenter attached a petition signed by 107 members of the Kokopelli ATV Club requesting that access routes be opened, or that the BLM reverse the closure of access routes, for vehicles used by older and disabled persons wanting to view the popular sights in GBNM.

### **Road Maintenance**

*Issue: To what extent will the BLM create a plan for road and trail maintenance?*

#### Comment Summary

- Multiple commenters expressed concerns about road conditions and suggested the BLM prepare an ongoing plan for road and trail maintenance in GBNM.
- One commenter specifically mentioned that access roads to Tassi and Pakoon Springs through St. Thomas Gap and Whitney Pass need maintenance.
- Another commenter recommended the BLM prioritize maintenance of roads leading to the Whitney Pocket area.
- Another commenter suggested the BLM create a plan of how to maintain roads with the increase in thunderstorms' frequency.
- Another commenter suggested the BLM maintain the paved section into the monument and the gravel roads to Gold Butte Townsite and Arvada; all other roads should receive only minimal maintenance to repair washouts or other issues.
- Another commenter recommended the BLM coordinate with the National Park Service to resume maintaining the roads that the National Park Service manages near the Lake Mead National Recreation Area.
- Another commenter expressed concerns regarding OHV users attempting hill climbs in the mud hills, specifically on Gold Butte Road between St. Thomas Gap Road and Horse Wash. The commenter suggested the BLM create a plan to monitor these areas more closely.
- Another commenter recommended the BLM redirect recreation uses from cultural resources by developing points of interest elsewhere and by maintaining roads and road closures.



- The Kokopelli ATV Club and the Virgin River Coalition offered to assist the BLM with regular trash cleanups and to participate in restorative efforts to remove invasive species and replant native species. These groups also stated that the city of Mesquite is applying for a grant to purchase an excavator for various projects to address issues of road and trail maintenance, including at GBNM.

### **Route Designations**

*Issue: How will the BLM prevent the creation of social trails that have the potential to degrade the values within the monument?*

#### Comment Summary

- One commenter suggested a minimization criterion to designate roads and trails to manage OHV use; to prevent degradation to soil, air, and water quality; to protect threatened wildlife and sensitive cultural resources; and to help balance all recreational uses.
- Another commenter recommended the BLM not promote the creation of more OHV trails and roads due to misuse that occurs with this type of recreation.
- Another commenter reported that on Gold Butte Road going southbound, the first road past Whitney Pocket and to the left provides access for hill climbs; it should be managed to prevent illegal off-road travel.
- Another commenter reported that people continue to drive past where Horse Spring Road ends and other places where this type of illegal use occurs. They suggested the BLM prepare a plan for managing these areas to prevent potential habitat damage.
- Another commenter suggested the BLM create trails that lead to popular sites to reduce the creation of unauthorized routes.

### **Travel Management Plan**

*Issue: Will the BLM adjust the travel management plan to adapt for climate change and increased use?*

#### Comment Summary

- One commenter suggested that the travel management plan should consider the increase of recreation in the area and address needed changes to the road maintenance procedure. This is due to challenges associated with climate change; also, unpaved roads need additional drains.
- Another commenter suggested the BLM classify roads in the travel management plan according to vehicle categories, such as roads intended for sedans; two-wheel-drive, high-clearance vehicles; and four-wheel-drive, high-clearance vehicles. The BLM should maintain these roads so that the vehicles in those categories can safely travel without abnormal damage to the suspension, body, or paint under normal conditions.

### **Unauthorized Routes**

*Issue: How will the BLM prevent the use and creation of unauthorized routes?*

#### Comment Summary

- One commenter recommended the BLM increase the law enforcement presence in the monument to prevent and penalize illegal OHV use and route creation.

### **Lands and Realty**

*Issue: How will the BLM manage rights-of-way within GBNM?*

#### Comment Summary

- A commenter suggested the BLM designate exclusion or avoidance areas in the monument and work with existing right-of-way holders to relocate outside GBNM, if possible, rather than permitting renewal or expansion of rights-of-way in existence at the time the monument was created.

### **Rangeland Management**

*Issue: How will the BLM manage rangelands to prevent unauthorized grazing?*

#### Comment Summary

- One commenter reported that because there is no fence between the herd area and herd management area, wild burros travel back and forth over the Arizona/Nevada state line. Also, unauthorized cattle and wild horses can move east onto allotments administered by the Arizona Strip Field Office. This commenter suggested that the Nevada and Arizona BLM offices work together to fund and implement herding, gathers, placement of salt and/or mineral licks, and construction of fences to minimize the movement of livestock, wild horses, and burros.

### **Grazing**

*Issue: How will the BLM address existing grazing allotments that overlap the monument?*

#### Comment Summary

- A commenter noted that Proclamation 9559 failed to recognize that grazing was already occurring in GBNM. The commenter stated that the Lime Spring allotment is entirely within GBNM, and the existing grazing permit does not expire until February 2030. The commenter proposed returning management of this allotment to BLM Nevada, since the allotment lies entirely within that state. Only a portion of the Mesquite Community allotment is contained within the monument boundary, and the commenter provided that its permit will not expire until December 2030. The commenter requested that the implementation plan make the distinction that existing permits, even when renewed, are not considered new permits and will not be subject to Proclamation 9559's prohibition on new grazing. The commenter clarified that this would only apply to fully processed permits and transferred permits, so long as the permits themselves were in existence when the monument was proclaimed. This commenter also requested that the boundaries of the Lime Springs and Mesquite Community grazing allotments be modified so that they no longer overlap GBNM.

*Issue: To what extent will the BLM mention the damage to monument objects by illegal trespass grazing or potential remedies to the issue in this NEPA process?*

#### Comment Summary

- Multiple commenters expressed concerns regarding illegal trespass grazing in the monument. Commenters noted that though livestock grazing on lands within GBNM have been ostensibly closed for over two decades, illegal grazing still occurs and threatens wildlife, vegetation, water resources, and other objects of scientific and prehistoric interest. Commenters were especially concerned about impacts on the desert tortoise and on riparian habitats, which may degrade the Virgin River ecosystem. Along with the direct impacts related to livestock in the monument,

commenters stated that range improvements, such as fences, water troughs, and corrals, damage monument objects and endanger visitors.

### **Wild Horses and Burros**

*Issue: How does the BLM plan to address wild burro populations present in the monument?*

#### Comment Summary

- Multiple commenters noted that feral burros create trails, damage water sources (including springs), and create erosion. To protect the important resources that led to the monument's designation, commenters requested that the BLM take action to control burro populations in the monument.

### **Special Designations**

*Issue: Will the BLM consider including more special designation areas in GBNM?*

#### Comment Summary

- One commenter recommended that the BLM analyze sensitive and vital ecological areas in the monument for special designations that would protect the nature, solitude, and other values. This commenter provided specific recommendations, including Bitter Ridge gaining wilderness status and Little Finland gaining additional protections.
- Another commenter stated the BLM should manage the lands within the monument according to the National Landscape Conservation System to ensure that these lands are managed consistently for conservation and safeguarded for future generations.
- Another commenter stated that all alternatives and the final plan for GBNM should be within the guidelines of BLM Manual 6220 – National Monuments, National Conservation Areas, and Similar Designations.

### **Lands with Wilderness Characteristics**

*Issue: How will the BLM manage lands with wilderness characteristics within GBNM?*

#### Comment Summary

- One commenter suggested the BLM remove old barbed-wire fences around the monument.
- Another commenter suggested that areas identified as lands with wilderness characteristics be expanded and maintained to preserve the look and feel of the monument.
- Another commenter requested the BLM commit to maintaining wilderness character and the quality of designated wilderness areas, wilderness study areas, instant study areas, and other lands with wilderness characteristics.

### **Visual Resources and Dark Skies**

*Issue: Does GBNM qualify as a dark sky reserve and dark sky park?*

#### Comment Summary

- One commenter requested the BLM protect the dark sky resources in GBNM. This commenter recorded dark sky measurements at GBNM and found averages of 21.21 magnitude per square arcsecond. This means the monument meets the threshold to qualify as a dark sky reserve and a dark sky park, according to the International Dark-Sky Association.

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# Appendix A

## Scoping Comments

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## Appendix A. Scoping Comments

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Alternatives_508"	N/A	8	Public outreach	I would like to suggest that Gold Butte should not exclusively belong to people who speak English. Including information on displays in Spanish would support learning about Gold Butte for the 560,000 Nevadans who speak Spanish at home; including information on displays in the local Native languages - presumably that of the Moapa Paiute at a minimum - would recognize that Gold Butte is Native land and that the Paiute are a part of it. Incorporating those values into your planning process can ensure that they are implemented later on.
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Public outreach	Presidential Proclamation 9559 says the BLM should create and maintain a management plan and "provide for maximum public involvement". Throughout this planning process, the BLM must endeavor to communicate in a variety of ways to solicit input from as many interests as possible. The process should be well defined and broadly communicated. There are so many different reasons for visiting the Monument including hiking, 4WD touring, mountain biking, horse riding, bird watching, etc. and all these people should have a say in the plan development. This communication should be done as widely as possible. We were there during the recent President's Day weekend and saw license plates from nearly every western state. The BLM must maintain transparency in this process and keep the public informed about what they are learning and where they are heading.
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Public outreach	Many organizations, including the Friend of Gold Butte, the Wasatch Mountain Club, and others have a history of service. They should be utilized in both the 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.
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Public outreach	The I P & E A 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 recreation, preservation and the economy. This should be done in both the planning process and the long-term implementation of the plan.
Comment period for "Draft Purpose and Need_508"	N/A	19	Public outreach	The local people who live in the area need to be more included and partnered with the BLM to make these kind of choices - not outside entities that don't live here, that don't work here, that don't enjoy this area and love it and protect it and try to keep it clean. Along with the BLM, we've worked with them for many years.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Public outreach	Communication. How this plan is communicated to the public will greatly affect its success in implementation. We urge you to continue communicating how management decisions will benefit the public and the resources that Gold Butte National Monument was designated to protect.
Comment period for "Draft Purpose and Need_508"	Virgin Valley Water District	24	Cooperating agencies	The District also anticipates working with the BLM as a Cooperating Agency during the process should the BLM decide to invoke any such planning designation.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Cooperating agencies	Partnership. Continue to work cooperatively with groups such as ours, Friends of Gold Butte, and Nevada Site Stewards to identify problems and land use trends that damage the resources Gold Butte National Monument was created to protect.

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Alternatives_508"	Conservation Lands Foundation	21	Tribal consultation	The proclamation directs BLM to "provide for maximum public involvement in the development of that plan including, but not limited to, consultation with State, tribal, and local governments."12 During the IP process, BLM must take all reasonable steps to consult and collaborate with Tribal Nations, local governments, and the public. In particular, BLM must consult with Tribal Nations that are culturally connected to the landscape. Their traditional knowledge and understanding of the area are critical as the BLM develops an Implementation Plan that will impact cultural resources. 12 Id. Several ways for the BLM to best engage Tribal Nations, local governments, and communities include: -Being inclusive of all history within the monument including but not limited to its rich native and mining history. -Ensuring consultation of Tribal Nations on all appropriate activities. -Enlisting Tribes in the interpretation and/or protection of key Tribal resources in the monument and using Native stories and languages in interpretation where appropriate and with the consent of Tribal Nations. -Drawing upon "Traditional Ecological Knowledge" - Native knowledge, traditions, values, and attitudes toward the Earth - as guidance for how BLM might interpret natural and cultural resources in Gold Butte for the public. -Partner with Tribes to launch a study of culturally significant resources in the monument that may be important for consideration in recreation and conservation decisions. -Creating culturally accessible materials for non-English speakers and international visitors. -Consider accessibility in both creating interpretive materials and infrastructure improvements on trails - for example ensuring trails and trail entrances are wide enough to accommodate wheelchairs. Consider consulting and engaging accessibility experts in this process.
Comment period for "Draft Purpose and Need_508"	N/A	1	Purpose and need	This draft should be boiled down to simply state that the purpose and need for action is to ensure that the required protection of monument objects is successfully achieved.
Comment period for "Draft Purpose and Need_508"	N/A	2	Purpose and need	I disagree with this draft purpose and need. BLM should be preparing a full monument management plan, not this lesser monument implementation plan under the outdated regional RMP. The Proclamation clearly calls for a bona fide monument management plan akin to a RMP. Why is BLM obsessed with this inadequate implementation plan? What are the political forces driving this improper and arbitrary approach? The underlying Vegas RMP is over two decades old and does not address many contemporary management challenges and issues.
Comment period for "Draft Purpose and Need_508"	N/A	4	Purpose and need	There is no mention of the need to stop the harmful Bundy trespass grazing. This should be a dominant purpose and need.
Comment period for "Draft Purpose and Need_508"	N/A	9	Purpose and need	I think this draft should be more succinct and condensed. The purpose is to protect monument objects and resources and the need is to respond to the increasing threats to those objects and resources. Keep it simple. A verbose purpose and need increases the risk of vague and unreliable planning results.



Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Alternatives_508"	Conservation Lands Foundation	21	Purpose and need	The draft Purpose and Need states: "These resources include, but are not limited to, vital plant and animal wildlife habitat, significant geological formations, rare fossils, remnants of the western mining and ranching heritage, recreation, lands and realty, water resources, and prehistoric sites from Native American heritage."13 The very same sentence in Proclamation 9559, establishing the Gold Butte National Monument, does not include recreation. In fact, recreation is not mentioned once throughout the entirety of the Presidential Proclamation. CLF supports providing public access to the Monument. However, while recreation is an important use to be considered in the management of the Monument, it is not a resource or monument object to be conserved. At the Bears Ears National Monument, the BLM issued interim management guidance, which correctly stated that recreational uses are important, but discretionary: Proclamation 10285 makes clear that while the monument area is replete with diverse opportunities for recreation, including "rock climbing, hunting, hiking, backpacking, canyoneering, whitewater rafting, mountain biking, and horseback riding," that support the travel and tourism sector of the local economy, those activities are not themselves objects of historic and scientific interest designated for protection. Therefore, the agency must ensure that any proposed recreation use or activity is evaluated for monument management plan or resource management plan conformance and consistency with the proclamation prior to being authorized. Note that this requirement applies to special recreation permits that may come up for renewal, notwithstanding whether an event or activity has been permitted in the past.14 13 Gold Butte National Monument - Environmental Assessment, Draft Purpose and Need. <a href="https://eplanning.blm.gov/publicprojects/2021951/200535879/20069287/250075469/Draft%20Purpose%20and%20Need_508.pdf">https://eplanning.blm.gov/publicprojects/2021951/200535879/20069287/250075469/Draft%20Purpose%20and%20Need_508.pdf</a> 14 Interim Management of the Bears Ears National Monument. <a href="https://www.blm.gov/sites/default/files/docs/2021-12/BENM%20Interim%20Guidance%2012-16-21_Final508.pdf">https://www.blm.gov/sites/default/files/docs/2021-12/BENM%20Interim%20Guidance%2012-16-21_Final508.pdf</a> Similarly, at the Gold Butte National Monument, all proposed recreational uses must be evaluated with respect to their impacts on protected monument objects and values. More specifically, the IP should: - Establish recreation management areas emphasizing primitive and backcountry experiences consistent with the overall purpose of Gold Butte National Monument and the National Conservation Lands. - Disallow recreational activities, such as target shooting, motorized and mechanized recreation and rock climbing, in areas where harm may occur to the Monument's objects and values. - Direct visitor use 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. - Ensure visitation and recreation lead to heightened education about the cultural resources within the Monument. - Ensure accessibility to the monument by directing BLM to provide signage in various languages and to include information on the accessibility (difficulty, length, etc.) of trails.
Comment period for "Draft Purpose and Need_508"	N/A	23	Purpose and need	Mojave desert tortoises are an ESA listed threatened species. Most tortoise populations are rapidly declining. Tortoises are both a keystone and umbrella species for the ecological health of the Mojave desert. This national monument contains tortoise critical habitats. Consistent with the ESA and monument proclamation, BLM should add to this draft purpose and need the effective protection and recovery of tortoises.
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Alternatives (general)	We believe another alternative should be developed or one of them altered to so there is a dual management philosophy of preservation and sustainable recreation. Some combination of Alternatives B and C would be ideal!
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	16	Alternatives (general)	The current predicted growth of surrounding communities in the broader region will result in an increasing visitation to the monument as time goes on. Thus, we don't really recommend a singular focus for monument management, as described in the Alternatives B C and D. We view A really is not practical. Rather, we recommend a system of zones and quarters where each is managed according to goal set for the specific area. This all alternatives would be employed but in different zones. In general, we recommend that the northern zone be managed for increased recreational use and development kind of a mix of Alternatives B and C. That the sort of middle zone be managed for resource, sustainability, and consistent uses, mostly B, and that the southern zone be managed for more limited use and resource protection.
Comment period for "Draft Alternatives_508"	N/A	19	Alternatives (general)	Most of Gold Butte qualifies as Land with Wilderness Characteristics. The BLM should define these areas and manage them with the strictest protections (Alternative D). However, other areas and travel corridors do not qualify as such. In these other areas, the monument should be managed under Alternatives B and C, depending on the situation. Applying a single Alternative to the entire monument does not make sense, nor does it best provide for access while protecting the Objects and Values of the monument.
Comment period for "Draft Alternatives_508"	Conservation Lands Foundation	21	Alternatives (general)	BLM must follow the correct legal principles in development of the management plan and thus all management decisions and alternatives should advance the protection of all monument objects and values identified in both Proclamation 9559. BLM is required under the National Environmental Policy Act (NEPA) to develop and evaluate a "reasonable range" of management alternatives. However, this range of management alternatives is constrained by the requirement that any alternative ultimately selected by BLM must protect the unit's objects and values. For this reason, BLM should only develop and evaluate alternatives that ultimately provide sufficient protection for the objects and values as identified in the proclamation.6 6 Courts have confirmed that National Monument proclamation have the force of law and the BLM must recognize the special status of monument objects and management planning. In a case involving the Upper Missouri River Breaks National Monument, the US Ninth Circuit Court of Appeals found that "[t]he proclamation changed the legal landscape and BLM must consider this change in determining the reasonable range of alternative that should be carefully analyzed". <i>Western Watersheds Project v. Abbey</i> , 719 F.3d 1035, 1053 (9th Cir. 2013).

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Alternatives_508"	BlueRibbon Coalition	23	Alternatives (general)	In addition to a recreation alternative, the BLM should consider an alternative that corrects the disturbing socioeconomic trends that are taking root in the Western communities that call the areas surrounded by the Gold Butte areas home.
Comment period for "Draft Alternatives_508"	BlueRibbon Coalition	23	Alternatives (general)	OHV opportunities in Nevada are becoming few and far between. Alternatives need to better recognize the recreational value that these opportunities bring and the BLM needs to manage for multiple use and not restrict these opportunities further. Current trends show an increase in outdoor recreation the past few years that isn't looking to slow down. The Bureau of Economic Analysis recognized outdoor recreation as an almost 1 trillion dollar a year industry. 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. Wilderness areas have already been studied and established. 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. BRC also advocates for provisions that will allow groups to use state grants to maintain and build more trails.
Comment period for "Draft Alternatives_508"	BlueRibbon Coalition	23	Alternatives (general)	The Bureau of Land Management is required to show a broad range of alternatives when undertaking a NEPA process. In order to adequately comply with NEPA the BLM must have alternatives that explore a range of alternatives. The BLM often creates a "conservation" alternative, which we see in Alternative D, then it is typical to present several other alternatives that include varying levels of closures and restrictions from the baseline. That BLM has conditioned itself to believe that it must never expand or enhance recreation access through the planning processes is an inherent and fundamental flaw of this process and a violation of NEPA. This inequitable privilege of one stakeholder's interest over the interests of other stakeholders taints the integrity of the NEPA process. The purpose and need of this plan is to create better management strategies, not to simply close and restrict use. Closure is not management. These areas provide a purpose and need for outdoor access that improves physical and mental health for public land users.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Alternatives (general)	Proposed Alternatives. We recommend applying the preliminary EA Draft Alternatives B, C, and D to different zones and corridors in the Monument, where each is managed according to the goals for that area. In general, we recommend that a northern zone be managed for higher recreational use and development (mix of Alternatives B and C), that a middle zone be managed for resource sustainability and consistent uses (Alternative B), and a southern zone be managed for more limited use and resource protection (Alternative D).
Comment period for "Draft Purpose and Need_508"	Nevada Department of Wildlife, Southern Region	29	Alternatives (general)	The Proposed Management Alternatives for GBMN offering the most potential to address the present situation emphasizing landscape stewardship are B (BLM Proposed) and C. Of the two, alternative B includes a tangible reference to the 2019 NEPA process addressing the proposed Gold Butte National Monument Historic Properties Protection Project. This seems the single example of difference between alternatives B and C as the latter is more nebulous in specific examples. We value having become a cooperating agency in development of the Plan and NEPA analysis. With this in mind, we believe intent of Governor's Executive Order 2021-18 calling for preparation of the Nevada Habitat Conservation Framework and Wildlife Connectivity Plan would seem to dovetail with the overall purpose of GBNM establishment, previous designations of ACEC designation overlapping the Gold Butte-Pakoon Critical Habitat for desert tortoise recovery, designated wilderness and lands having wilderness characteristics along with NDOW's and BLM's coordination in management of regional wildlife populations and habitats including historic habitat of desert bighorn sheep.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Alternatives (general)	The Friends of Gold Butte recognize the current and predicted growth of the surrounding communities will result in increasing visitation to the monument as time goes on, but the use will affect different areas differently. Thus we don't recommend a singularly focused Alternative for the entire monument as described in Alternatives B, C, or D. Rather, we recommend a system of zones and corridors where each is managed according to goals set for the specific zone or corridor. Thus, FOGB recommends that all alternatives be employed, but in differing areas as appropriate for the specific zone or corridor.
Comment period for "Draft Alternatives_508"	Conservation Lands Foundation	21	Alternative A (No Action)	Proclamation 9559 directs the Secretary, through the BLM, to "prepare and maintain a management plan for the monument." As a result, Alternative A, the No Action Alternative, is not a viable option for the BLM to remain in compliance with the Proclamation.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Alternative A (No Action)	The Friends of Gold Butte believe that balancing visitation and recreation with protection of natural, cultural, and historic resources remains the overarching management issue for GBNM and all public lands. Ever-increasing public use of the monument and the included Objects and Values can be neither ignored nor denied as environmental damage continues to accumulate in high-use areas. Such use can be controlled and the effects mitigated through careful and thoughtful management. Thus, Alternative A is not viewed as practical in safeguarding the Objects and Values for future generations.
Comment period for "Draft Purpose and Need_508"	N/A	35	Alternative A (No Action)	As a local resident of the area, I support the option I. The entire area is perfect as is. There is no need to disrupt the land and the residents with schemes to put in toilets then limit access to the area. Leave the area alone. Leave the people who recreate in the area alone. Stop wasting money just to have something to do.

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Alternative B (Proposed Action)	We believe much of the focus should be on preservation as described in Alternative B. Realistically however, the area will undoubtedly see increased recreation use. The usage must be planned for, managed, monitored, and mitigated if necessary. An emphasis on preservation, recreation, and manageability is imperative. Some restrictions will be necessary and these must be monitored and enforced.
Comment period for "Draft Alternatives_508"	N/A	14	Alternative B (Proposed Action)	In general I agree with Alternative B realizing that some improving of the area is needed. The chip sealing never gets finished and weather takes it's toll on the portions we have done. There are some roads I can't drive with the vehicle I own but that I accept. Having road conditions posted is very helpful.
Comment period for "Draft Alternatives_508"	Conservation Lands Foundation	21	Alternative B (Proposed Action)	CLF also recognizes the importance of balancing visitation and protection of Monument objects. As a result, we also support the proposed alternative, Alternative B. In particular, we recognize that additional signage is necessary to provide important information and make the Monument accessible to all.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Alternative B (Proposed Action)	Unpaved travel corridors in the northern and middle sections of Gold Butte (e.g., dirt roads in the Virgin Peak area including Fisherman Flats, and dirt roads between Whitney Pocket and Gold Butte Townsite (including Little Finland) should be managed under Alternative B (resource sustainability and consistent uses). These areas receive considerable use, but mostly along roads. As such, roads should be maintained to the extent that drivers will choose to stay on existing roads (not drive in the desert to avoid washouts and rocks), and minimal infrastructure (e.g., strategically placed vault toilets and campsites) should be developed to protect the Objects and Values of the monument.
Comment period for "Draft Alternatives_508"	Kokopelli ATV Club and the Virgin River Coalition (VRC)	16	Alternative C (Increased Recreation Use)	The goals of the Kokopelli ATV Club of Mesquite and of the Virgin River Coalition are most aligned with alternative C. We want to maximize safe opportunities for public recreation while minimizing their ecological impact. These beautiful Public lands should be available for the enjoyment of everyone.
Comment period for "Draft Alternatives_508"	Conservation Lands Foundation	21	Alternative C (Increased Recreation Use)	All proposed alternatives must be consistent with the Proclamation 9559, designating the Gold Butte National Monument. Alternative C, the Increased Recreation Use Alternative, is not consistent with Proclamation 9559. This Proclamation designates Gold Butte as a monument to protect valuable cultural and natural resources, not recreational uses (see Recreation section above). A plan more focused on recreation than monument objects thus does not meet the legal requirements for protection of monument values and objects. CLF is concerned that heightened recreational infrastructure could negatively impact the objects and values for which the Monument was designated. As a result, CLF does not support adoption of Alternative C, the Increased Recreation Use Alternative.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Alternative C (Increased Recreation Use)	The northern travel corridors (e.g., Paved Gold Butte Road, Whitney Pocket area, Falling Man area, and the Cabin Canyon area) should be managed under Alternative C (increased recreational use and development). These are the areas most affected by current visitor use, and improved facilities would manage and mitigate this use to protect the Objects and Values of the monument.
Comment period for "Draft Alternatives_508"	N/A	1	Alternative D (Management for Use and Resource Protection)	I support Alternative D because it is most likely to provide the legally required protection for monument objects and values. The Antiquities Act trumps FLPMA. Object protection supersedes multiple uses. Monument management must focus on object protection.
Comment period for "Draft Alternatives_508"	N/A	2	Alternative D (Management for Use and Resource Protection)	D is the best alternative. Gold Butte National Monument objects are increasingly being stressed and need greater protection. The worst drought in 1,200 years. Expanding cheatgrass and devastating fires. Hundreds of Bundy trespass cattle. Illegal OHV routes. BLM has not adequately protected monument objects despite its legal obligation to do so. This pattern of management cowardice and incompetence must end.
Comment period for "Draft Alternatives_508"	N/A	3	Alternative D (Management for Use and Resource Protection)	I think that Alternative D should be chosen by BLM for implementation. It would provide necessary protection for natural and cultural resources.

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Alternatives_508"	N/A	5	Alternative D (Management for Use and Resource Protection)	Please support Alternative D. The climate and extinction crises are getting more severe. Resource protection is therefore increasingly necessary. BLM must ensure the protection of GBNM objects and values. That's the top priority and management bottom line. By doing so, BLM will follow the law and serve the public interest.
Comment period for "Draft Alternatives_508"	N/A	11	Alternative D (Management for Use and Resource Protection)	I think BLM should pick Alternative D to improve resource protection. Americans collectively own this national monument and most Americans support stronger resource protection. Public recreation is important but it must be managed to ensure that it is environmentally responsible.
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Alternative D (Management for Use and Resource Protection)	The Monument would best thrive under Alternative D, but it would be unrealistic to think management would be practical. There will be increased visitation. It must be managed to ensure protection of natural and cultural resources as identified in Presidential Proclamation 9559.
Comment period for "Draft Alternatives_508"	N/A	15	Alternative D (Management for Use and Resource Protection)	Alternative D is preferred because it would best help to protect monument objects and values. However, BLM does not have the authority or discretion to allow any human uses that may degrade or jeopardize monument objects or values. BLM should not presume otherwise. Normal BLM FLPMA multiple use and sustained yield management is superseded in this national monument. The Antiquities Act and monument proclamation are the "dominant reservation" in the monument and this must be respected.
Comment period for "Draft Alternatives_508"	N/A	20	Alternative D (Management for Use and Resource Protection)	Alternative D should be the BLM preferred alternative. Object protection is the dominant purpose of this monument.
Comment period for "Draft Alternatives_508"	Conservation Lands Foundation	21	Alternative D (Management for Use and Resource Protection)	CLF endorses Alternative D, Management for Use and Resource Protection, as the best choice for sound monument management. "Alternative D would be the most proactive in promoting conservation and recovery of endangered and other special status species, preserving and restoring cultural and historic resources and protecting other social and scientific values consistent with the care and management of the objects identified in the proclamation."15 Because the Gold Butte National Monument is a unit of the National Conservation Lands, BLM must manage these lands first and foremost for the conservation, protection, and enhancement of resources over other uses. Alternative D best meets these management standards for the National Conservation Lands. 15 Gold Butte National Monument - Environmental Assessment, Draft Alternatives. <a href="https://eplanning.blm.gov/public_projects/2021951/200535879/20069285/250075467/Draft%20Alternatives_508.pdf">https://eplanning.blm.gov/public_projects/2021951/200535879/20069285/250075467/Draft%20Alternatives_508.pdf</a>
Comment period for "Draft Alternatives_508"	N/A	22	Alternative D (Management for Use and Resource Protection)	Among the alternatives provided, D should be chosen. Resource protection must be the top priority.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Alternative D (Management for Use and Resource Protection)	Lands With Wilderness Character (LWC) throughout the entire Gold Butte region should be maintained for the wilderness character of these lands, and therefore Alternative D (resource protection) should be applied to these areas
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Alternative D (Management for Use and Resource Protection)	All of southern Gold Butte (perhaps defined as Gold Butte Road south of Devils Cove Road to include the travel corridors of Devils Cove Road and Scanlon Road, or perhaps a line drawn from Garden Wash to Quail Wash) should be managed under Alternative D (resource protection). Consistent with the Travel Management Plan, existing roads would remain open and maintained, but no other development would occur in this area to maintain the wild, remote, and primitive nature of these lands.

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Alternatives_508"	N/A	3	Best available information-baseline data	I ask BLM to carefully review the attachments relating to recreation and public lands livestock grazing. This information may be helpful to this GBNM planning process.
Comment period for "Draft Alternatives_508"	N/A	7	Best available information-baseline data	The attachments provide scientific documentation of the climate change and many other adverse impacts that result from ongoing public lands grazing. These impacts are directly relevant to harm that has and can result to GBNM objects and values. These impacts are now magnified with increasing drought and extreme heat events. In much of the West, BLM allows many of these impacts to continue through lax or weak grazing management. BLM has a clear traditional bias favoring ranchers and grazing. But these impacts are even more egregious when they occur in a complete trespass situation with Cliven Bundy. Please include my comments and the attachments in this NEPA planning project file. They describe BLM's appalling pattern of perfidy, sloth, cowardice, and incompetence in dealing with the chronic Bundy trespass grazing.
Comment period for "Draft Alternatives_508"	N/A	9	Best available information-baseline data	Please review the four relevant attachments and include them in this BLM project file. These attachments describe the significant climate change related and other adverse impacts from livestock grazing on public lands in the West. These impacts are bad enough when BLM continues to authorize them, but they are even worse when done in the Bundy trespass grazing context.
Comment period for "Draft Alternatives_508"	N/A	15	Best available information-baseline data	Please carefully review the relevant Secretary Haaland letter at this web link: <a href="https://www.counterpunch.org/2021/07/12/an-open-letter-to-interior-secretary-haaland-cliven-bundys-chronic-trespass-grazing-must-end-and-how-to-do-it/">https://www.counterpunch.org/2021/07/12/an-open-letter-to-interior-secretary-haaland-cliven-bundys-chronic-trespass-grazing-must-end-and-how-to-do-it/</a>
Comment period for "Draft Alternatives_508"	N/A	15	Best available information-baseline data	Please also carefully review the attachments relating to the climate change and other destructive effects from livestock grazing on public lands in the West.
Comment period for "Draft Alternatives_508"	N/A	18	Best available information-baseline data	Please review the attached chronology of Bundy trespass grazing related actions. This chronology ends before the infamous Bunkerville Standoff. But it shows the long history of adverse actions even before this highly-publicized event. Of course, since the standoff, this pattern of actions has continued up to the present day. I believe that Cliven and BLM both share culpability for this shameful history.
Comment period for "Draft Purpose and Need_508"	Desert Tortoise Council	21	Best available information-baseline data	We note that part of the planning process is for the BLM to eventually prepare an Environmental Assessment (EA) analyzing the various alternatives. To ensure that BLM is familiar with and uses the best available science in the EA to analyze the alternatives - particularly Alternative C - we have attached an extensive bibliography of vehicle impacts in desert areas in Appendix B. We expect this information to be summarized in the EA with regards to vehicle impacts that would not result but for the alternative chosen.
Comment period for "Draft Purpose and Need_508"	Desert Tortoise Council	21	Best available information-baseline data	We refer BLM to a document that it funded in 2012, entitled "Analysis of Conservation Priorities for the Bureau of Land Management's Gold Butte-Pakoon Desert Tortoise Management Area" (SWCA Environmental Consultants 2012) and a scientific paper of the Gold Butte Pakoon (Tuma et al. 2016). The BLM-funded document indicates that livestock and burros, human presence, subsidized predators, and wildfire are priority threats that need to be managed. The scientific paper recommends (1) removal of all livestock and feral burros from the conservation area; (2) restoration of disturbed lands within the conservation area, including closed roads and routes, and areas damaged by illegal off-highway vehicle use, livestock grazing, and feral burros; and (3) monitoring changes in the occurrence of other threats (subsidized predators, wildfire) in the conservation area, and manage these threats as necessary. Please include information in the EA as to how these threats have been addressed by current management. Importantly, the 2012 document provides specific recommendations for the BLM to address each of these threats. So, if not already implemented by the BLM, we ask that the recommendations given on pages 75 through 82 of SWCA Environmental Consultants (2012) be implemented as part of the IP and that the EA document a schedule for their implementation.

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Purpose and Need_508"	Desert Tortoise Council	21	Best available information-baseline data	Literature Cited Allison L.J. and McLuckie, A.M. 2018. Population trends in Mojave desert tortoises ( <i>Gopherus agassizii</i> ). Herpetological Conservation and Biology. 2018 Aug 1;13(2):433-52. Berry, K.H., L.J. Allison, A.M. McLuckie, M. Vaughn, and R.W. Murphy. 2021. <i>Gopherus agassizii</i> . The IUCN Red List of Threatened Species 2021: e.T97246272A3150871. <a href="https://dx.doi.org/10.2305/IUCN.UK.2021-2.RLTS.T97246272A3150871.en">https://dx.doi.org/10.2305/IUCN.UK.2021-2.RLTS.T97246272A3150871.en</a> Desert Tortoise Council. 2020. A Petition to the State of California Fish and Game Commission to change the status of <i>Gopherus agassizii</i> from Threatened to Endangered. Formal petition submitted on 11 March 2020. SWCA Environmental Consultants. 2012. Analysis of Conservation Priorities for the Bureau of Land Management's Gold Butte-Pakoon Desert Tortoise Management Area. Unpublished report prepared on behalf of the BLM by Principal Investigator, Michael Tuma. Pasadena, CA. [BLM] U.S. Bureau of Land Management. 2016. Record of Decision for the Land Use Plan Amendment to the California Desert Conservation Plan, Bishop Resource Management Plan, and Bakersfield Resource Management Plan for the Desert Renewable Energy Conservation Plan (DRECP). Dated September 2016. Sacramento, CA. [BLM] Bureau of Land Management. 2019. West Mojave Route Network Project Final California Desert Conservation Plan Amendment and Supplemental Environmental Impact Statement for the California Desert District. BLM/CA/DOI-BLM-CA-D080-2018-0008-EIS. January 2018. Moreno Valley, CA. Tuma, M., C. Millington, N. Schumaker, and P. Burnett. 2016. Modeling Agassiz's Desert Tortoise Population Response to Anthropogenic Stressors. The Journal of Wildlife Management 80(3):414-429; 2016; DOI: 10.1002/jwmg.1044. [USFWS] U.S. Fish and Wildlife Service. 2014. Status of the desert tortoise and critical habitat. Unpublished report available on the Desert Tortoise Recovery Office's website: "02/10/2014 Status of the Desert Tortoise and Critical Habitat (.704MB PDF)." Reno, NV. [USFWS] U.S. Fish and Wildlife Service. 2015. Range-wide Monitoring of the Mojave Desert Tortoise ( <i>Gopherus agassizii</i> ): 2013 and 2014 Annual Reports. Report by the Desert Tortoise Recovery Office, U.S. Fish and Wildlife Service, Reno, Nevada. 44 pages. [USFWS] U.S. Fish and Wildlife Service. 2019. Preparing for any action that may occur within the range of the Mojave desert tortoise ( <i>Gopherus agassizii</i> ). USFWS Desert Tortoise Recovery Office. Dated 21 August 2017. Reno, NV. [USFWS] U.S. Fish and Wildlife Service. 2020. Translocation of Mojave Desert Tortoises from Project Sites: Plan Development Guidance. U.S. Fish and Wildlife Service, Las Vegas, Nevada. <a href="https://www.fws.gov/nevada/desert_tortoise/documents/reports/2020/RevisedUSFWSDTTTranslocationGuidance20200603.pdf">https://www.fws.gov/nevada/desert_tortoise/documents/reports/2020/RevisedUSFWSDTTTranslocationGuidance20200603.pdf</a> . [USFWS] U.S. Fish and Wildlife Service. 2022a. Range-wide Monitoring of the Mojave Desert Tortoise ( <i>Gopherus agassizii</i> ): 2020 Annual Reporting DRAFT. Report by the Desert Tortoise Recovery Office, U.S. Fish and Wildlife Service, Reno, Nevada. [USFWS] U.S. Fish and Wildlife Service. 2022b. Range-wide Monitoring of the Mojave Desert Tortoise ( <i>Gopherus agassizii</i> ): 2021 Annual Reporting DRAFT. Report by the Desert Tortoise Recovery Office, U.S. Fish and Wildlife Service, Reno, Nevada.
Comment period for "Draft Purpose and Need_508"	Desert Tortoise Council	21	Best available information-baseline data	Appendix A. Demographic Status and Trend of the Mojave Desert Tortoise ( <i>Gopherus agassizii</i> ) Literature Cited in Appendix A
Comment period for "Draft Purpose and Need_508"	Desert Tortoise Council	21	Best available information-baseline data	Appendix B. Bibliography on road impacts in desert ecosystems
Comment period for "Draft Alternatives_508"	Conservation Lands Foundation	21	Best available information-baseline data	We look forward to working with the BLM throughout the planning process and thank you for your full consideration of these scoping comments. In addition, we strongly urge the BLM to fully consider the Citizens' Alternative Proposal, written in 2018 by CLF, Friends of Gold Butte, Nevadans for Cultural Preservation, Friends of Nevada Wilderness, Sierra Club Toiyabe Chapter, Friends of Sloan Canyon, Nevada Conservation League, Center for Biological Diversity, Red Rock Audubon Society, and The Wilderness Society. This proposal was resubmitted during this scoping period by The Wilderness Society and the Friends of Gold Butte.16 16 Citizens Alternative GBNM - final.pdf
Comment period for "Draft Purpose and Need_508"	Virgin Valley Water District	24	Best available information-baseline data	The District, as a governmental body, does not have a preference amongst the four alternatives so long as the December 2018 MOU requirements are carried out regardless of alternative selected. The District looks forward to continuing a positive relationship with the staff at the Las Vegas Field Office and working simultaneously to meet the needs of the BLM and the District.
Comment period for "Draft Purpose and Need_508"	Arizona Strip District Office Bureau of Land Management	31	Best available information-baseline data	See attached PDF for Gold Butte National Monument & Arizona Strip District Grazing Allotments Location Map
Comment period for "Draft Purpose and Need_508"	The Wilderness Society	32	Best available information-baseline data	The comments and Citizens' Alternative proposal below were submitted on February 2018 and March 2018, respectively, regarding the Gold Butte National Monument (GBNM) planning process when the Southern Nevada District Office considered planning for GBNM as part of a Resource Management Plan revision. That process was officially canceled in May of 2019. The BLM is now moving forward with an Implementation Plan for the monument, and The Wilderness Society is resubmitting those earlier comments and the Citizens' Alternative as its scoping comments for the Implementation Plan. Although the process the BLM is using to plan for GBNM may have changed, our previous scoping comments and Citizens' Alternative remain the applicable. When reviewing the documents, please note this context.

<b>Comment Period</b>	<b>Organization</b>	<b>Submission Number</b>	<b>Issue Category</b>	<b>Comment Text</b>
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Best available information-baseline data	We are resubmitting for consideration the comprehensive work done in 2017-2018 on a framework for a "Citizens Alternative Proposal" as most issues for GBNM have not materially changed. Some of the content in the 2018 document may not pertain to a more limited Implementation Plan, but we believe most of the content is relevant and should be considered.
Comment period for "Draft Purpose and Need_508"	Desert Tortoise Council	21	GIS data and analysis	Page 2 of the Alternatives document indicates that "Motorized vehicle use in the monument would be permitted only on roads designated as open" is common to all alternatives, which we applaud. We ask that the BLM produce maps to be included in the EA of all open and closed routes, and to prepare a schedule indicating when all open routes are to be signed and when all closed routes are to be eradicated through vertical mulching. This baseline information/mapping is crucial for current and future successful management of off-highway vehicle (OHV) use in the monument. It has been our experience that signing routes as "closed" often makes such routes more visible to recreationists who would not have otherwise used them. So, rather than signing closed routes, we recommend that they be eradicated and that the IP identify a schedule to implement the eradication and monitor its success. We strongly suggest that critical habitat be identified as the highest priority region for both signing open routes and eliminating closed routes.
Comment period for "Draft Purpose and Need_508"	Desert Tortoise Council	21	GIS data and analysis	Please be sure that the EA publishes maps that show tortoise critical habitat, Areas of Critical Environmental Concern, and other Tortoise Conservation Areas, including linkages, and modelled tortoise populations, and demonstrate how the route network, for example, was designed in part to minimize impacts to these essential conservation areas and the tortoises resident within them. Please also show the locations of grazing allotments and burro herd management areas, if any, relative to tortoise populations and conservation areas.

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Purpose and Need_508"	Desert Tortoise Council	21	Cumulative impacts	Finally, we feel that it is essential that the EA provide a meaningful and complete cumulative effects analysis. In the cumulative effects analysis of the EA, please ensure that the Council on Environmental Quality's (CEQ) "Considering Cumulative Effects under the National Environmental Policy Act" (1997) is followed, including the eight principles, when analyzing cumulative effects of the proposed action to the tortoise and its habitats. CEQ states, "Determining the cumulative environmental consequences of an action requires delineating the cause-and-effect relationships between the multiple actions and the resources, ecosystems, and human communities of concern. The range of actions that must be considered includes not only the project proposal but all connected and similar actions that could contribute to cumulative effects." The analysis "must describe the response of the resource to this environmental change." Cumulative impact analysis should "address the sustainability of resources, ecosystems, and human communities." For example, the EA should include data on the extreme, unprecedented losses of tortoise habitats and tortoises to solar development throughout southern Nevada and how the GBNM must function to help offset those losses. CEQ's guidance on how to analyze cumulative environmental consequences is given in the eight principles listed below: 1. Cumulative effects are caused by the aggregate of past, present, and reasonable future actions. The effects of a proposed action on a given resource, ecosystem, and human community, include the present and future effects added to the effects that have taken place in the past. Such cumulative effects must also be added to the effects (past, present, and future) caused by all other actions that affect the same resource. 2. Cumulative effects are the total effect, including both direct and indirect effects, on a given resource, ecosystem, and human community of all actions taken, no matter who (federal, non-federal, or private) has taken the actions. Individual effects from disparate activities may add up or interact to cause additional effects not apparent when looking at the individual effect at one time. The additional effects contributed by actions unrelated to the proposed action must be included in the analysis of cumulative effects. 3. Cumulative effects need to be analyzed in terms of the specific resource, ecosystem, and human community being affected. Environmental effects are often evaluated from the perspective of the proposed action. Analyzing cumulative effects requires focusing on the resources, ecosystem, and human community that may be affected and developing an adequate understanding of how the resources are susceptible to effects. 4. It is not practical to analyze the cumulative effects of an action on the universe; the list of environmental effects must focus on those that are truly meaningful. For cumulative effects analysis to help the decision maker and inform interested parties, it must be limited through scoping to effects that can be evaluated meaningfully. The boundaries for evaluating cumulative effects should be expanded to the point at which the resource is no longer affected significantly or the effects are no longer of interest to the affected parties. 5. Cumulative effects on a given resource, ecosystem, and human community are rarely aligned with political or administrative boundaries. Resources are typically demarcated according to agency responsibilities, county lines, grazing allotments, or other administrative boundaries. Because natural and sociocultural resources are not usually so aligned, each political entity actually manages only a piece of the affected resource or ecosystem. Cumulative effects analysis on natural systems must use natural ecological boundaries and analysis of human communities must use actual sociocultural boundaries to ensure including all effects. 6. Cumulative effects may result from the accumulation of similar effects or the synergistic interaction of different effects. Repeated actions may cause effects to build up through simple addition (more and more of the same type of effect), and the same or different actions may produce effects that interact to produce cumulative effects greater than the sum of the effects. 7. Cumulative effects may last for many years beyond the life of the action that caused the effects. Some actions cause damage lasting far longer than the life of the action itself (e.g., acid mine damage, radioactive waste contamination, species extinctions). Cumulative effects analysis need to apply the best science and forecasting techniques to assess potential catastrophic consequences in the future. 8. Each affected resource, ecosystem, and human community must be analyzed in terms of its capacity to accommodate additional effects, based on its own time and space parameters. Analysts tend to think in terms of how the resource, ecosystem, and human community will be modified given the action's development needs. The most effective cumulative effects analysis focuses on what is needed to ensure long-term productivity or sustainability of the resource. We request that the EA (1) include these eight principles in its analysis of cumulative impacts to the Mojave desert tortoise; (2) address the sustainability of the tortoise given the information on the Status of the Mojave Desert given in Appendix A; and (3) include mitigation along with monitoring and adaptive management plans that protect desert tortoises and their habitats during authorization of any activities by BLM.
Comment period for "Draft Purpose and Need_508"	Desert Tortoise Council	21	Mitigation and monitoring	Please be sure that the EA documents a robust, scientifically-based monitoring plan that documents baseline tortoise populations and human impacts to the tortoise and tortoise habitats, particularly from authorized and unauthorized grazing and recreational activities, to which future monitoring data can be compared.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Mitigation and monitoring	BLM Personnel. Allocate personnel to monitor monument usage, interact with users and encourage responsible recreation, protect cultural and other resources, provide for visitor safety, and enforce laws.
Comment period for "Draft Purpose and Need_508"	N/A	10	Level of NEPA analysis needed	First, the proclamation calls for a RMP level new monument management plan. This is NOT an implementation plan improperly resting on an old 1998 Las Vegas RMP. Other BLM monuments have stand alone monument plans so Gold Butte should too. This IP approach for Gold Butte is arbitrary and therefore in violation of the APA.



Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Purpose and Need_508"	Center For Biological Diversity	15	Level of NEPA analysis needed	Now, beyond that we are perturbed that BLM is failing to offer a Monument management plan, as specifically called for in the proclamation. When asked earlier, BLM said: The current RMP is adequate. In reality, the current RMP is not adequate, it does not match the Presidential proclamation. If that was the case, why need a monument at all?
Comment period for "Draft Alternatives_508"	N/A	20	Level of NEPA analysis needed	This planning should be for a monument RMP level plan not a weaker IP.
Comment period for "Draft Purpose and Need_508"	Desert Tortoise Council	21	Level of NEPA analysis needed	With regards to the following statement excerpted from the above text, "The IP would provide future site-specific actions while tiering off of the land use planning decisions in the Approved Las Vegas RMP, 1998 [emphasis added]," we have been very concerned and vocal about the deficiencies associated with the 1998 Las Vegas RMP. We note that this outdated 1998 RMP predates significant findings between 2014 (Allison and McLuckie 2018) and 2022 (USFWS 2020, 2021, 2022a, and 2022b; see Appendix A), documenting the ubiquitous declines of tortoises throughout most of the listed range. We do not believe that the RMP anticipated the tens of thousands of acres lost and thousands of tortoises displaced by solar development (as only one of many impacts) throughout southern Nevada, much of it within the RMP area. We judge these declines to constitute a significant changed circumstance that likely warrants reinitiation of Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS) to see how this National Environmental Policy Act (NEPA) document needs to be revised. We expect to see a detailed analysis in the EA that addresses the status of the desert tortoise throughout the listed range, within the Northeastern Recovery Unit, and regionally throughout southern Nevada. Furthermore, we recommend that the BLM reconsider developing this lower-level implementation planning effort that would tier off a clearly outdated RMP, noting that BLM normally prepares RMP-level plans for national monuments. We understand that BLM Nevada has announced that they will be amending their various RMPs starting fiscal year 2023. If BLM proceeds with deficient GBNM implementation-level planning now, it will likely be stuck between an old RMP and whatever a new RMP may bring in the coming years. BLM should just do a GBNM RMP level monument plan now.
Comment period for "Draft Alternatives_508"	Conservation Lands Foundation	21	Level of NEPA analysis needed	Proclamation 9559 directs BLM to "prepare and maintain a management plan for the monument." I I CLF appreciates that BLM is undergoing a full NEPA process for this IP to address planning-level issues. As a result, we respectfully request that BLM call the final product a Resource Management Plan (RMP) instead of an IP. I I Presidential Proclamation 9559, 2016. <a href="https://www.govinfo.gov/content/pkg/DCPD-201600876/pdf/DCPD-201600876.pdf">https://www.govinfo.gov/content/pkg/DCPD-201600876/pdf/DCPD-201600876.pdf</a>
Comment period for "Draft Purpose and Need_508"	Western Watersheds Project	30	Level of NEPA analysis needed	Western Watersheds Projects (WWP) remains concerned that the Bureau is moving forward with this project to implement a management plan cobbled together from the outdated 1998 Las Vegas RMP ROD. The Bureau needs to properly inventory and study Monument resources as part of a new Monument Management Plan, not an "Implementation Plan". Only a proper Monument Management Plan, as required by the Gold Butte National Monument Presidential Proclamation, will suffice. Much has changed on the ground since 1998. Anything other than a proper Monument Management Plan leaves the Bureau legally vulnerable. Please drop this project immediately and begin preparing a proper Monument Management Plan.
Comment period for "Draft Alternatives_508"	N/A	3	Air quality and climate	The worsening climate and extinction crises are causing greater environmental harm, including in places like Gold Butte National Monument (GBNM).
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Air quality and climate	This is already an arid area. With climate change some plant and animal life may be at even greater risk. The I P & E A must address this. For example, more needs to be done to preserve existing water resources and riparian areas. Specifically, the Red Bluff Spring riparian area is overridden with vehicle tracks and the Red Rock Spring area is showing degradation due to the recent presence of cattle as well as human foot travel.
Comment period for "Draft Alternatives_508"	N/A	22	Soil resources	Biological soil crusts are important because they reduce erosion, retain moisture, hinder cheatgrass, and fix nitrogen to improve productivity. These crusts are fragile and easily destroyed by livestock grazing, OHV recreation, and even hiking on them. They must be better protected as a key component of ecosystem health. I request that BLM include soil crust protection and restoration as part of this new monument plan.
Comment period for "Draft Purpose and Need_508"	N/A	26	Soil resources	We believe that it is in the best interest of Gold Butte's future health to adhere to Implementation Plan Alternative B, insofar as this addresses the importance of maintaining the integrity of cryptobiotic soil crusts--the bottom of the biological pyramid as it were. (See this recent PBS Newshour's article on the 'skin of our planet'.)
Comment period for "Draft Purpose and Need_508"	N/A	12	Water resources	I just like to express that we haven't talked about the overall drought conditions, and I think that should be a dominant idea, and how we manage. I think the impact is great. Every footstep makes a difference. Every road traveled creates dust. I think that we're not addressing this mega drought, and I would like to think that in the visitation be kept as low as possible. The encouragement of interpretive signs - it seems like an interesting idea, but ideally, I think it's just a very fragile desert, so I appreciate everyone wanting to recreate, and I can only imagine what it takes to manage the signs and post the signs in good shape. It's great to have directional signs. But let's try to think about the impact. Sometimes I hike there, and I listen to the birds. There's no bird song. I look for lizards. There's very few lizards, and I just think that we're, the overall dominant idea should be that there's a mega drought, and we should tread very lightly.

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Alternatives_508"	N/A	20	Water resources	BLM should assert reserved federal water rights to protect monument springs and seeps from harmful human diversions or uses.
Comment period for "Draft Purpose and Need_508"	N/A	26	Water resources	Restore riparian areas that have suffered significant damage from non-native ungulates. This includes repairing damage to watershed and spring area embankments and preventing native vegetation destruction from trampling (e.g., Red Bluff Spring). In addition the large quantity of cattle and burro feces in these areas will have to be addressed. This will require an ongoing effort for removal, but letting it accumulate is not an option. Consider the Mojave National Preserve's and Death Valley National Park's efforts to remove non-native ungulates to promote the health of the resource. Or, at the very least, block them from ALL spring areas. When I brought this up at the public meeting I received this response by a BLM official: "The BLM is currently analyzing the effect of partial burro and cattle exclusion from hydrologic and vegetative resources at spring sites in order to assess their effects on sensitive species dependent upon spring systems." My response to this: How much longer do you have to analyze? I have seen the damage and feces piles close up. No further study necessary!
Comment period for "Draft Purpose and Need_508"	Nevada State Clearinghouse Department of Conservation and Natural Resources	27	Water resources	General: Compliance with Nevada water law is required. All waters of the State belong to the public and may be appropriated for beneficial use pursuant to the provisions of NRS Chapters 533 and 534 and not otherwise. Water shall not be used from any source unless the use of that water is authorized through a permit issued by the State Engineer. For underground sources, certain uses of water may be authorized through the issuance of a waiver pursuant to NRS Chapter 534 and NAC Chapter 534. There are no active water rights appurtenant to the described lands in this proposed project. Any ownership transfer of water rights shall be sufficiently documented through a chain of title and a report of conveyance submitted to the State Engineer's Office as provided by NRS 533.384. The State Engineer is authorized and is responsible for maintaining water right files and accompanying documents as per NRS Chapters 111, 240, 375, 532, 533 and 534. Water for Construction Projects Ensure that any water used on a project for any manner of use shall be provided by an established utility or under permit or temporary change application or waiver issued by the State Engineer's Office with a manner of use acceptable for suggested project's water needs. Wells and Geotechnical Soil Borings All wells must be noticed, drilled, constructed, and plugged in accordance with NRS Chapter 534 and NAC Chapter 534, and the work must be completed by a licensed well driller as provided by NRS Chapter 534. Any unauthorized or unpermitted drill holes/wells (water or monitor wells or geotechnical soil boring) that may be located on existing, acquired or transferred lands, are ultimately the responsibility of the owner of the property and must be plugged and abandoned as required in NAC Chapter 534. Abandoned wells need to be reported to the State Engineer's Office and must be plugged in accordance with NAC Chapter 534. Dams Any impoundments, dams, or diversion structures must comply with the provisions of NRS Chapter 535 and NAC Chapter 535. Any person proposing to construct, reconstruct, or alter in any way any dam must comply with the provisions of NRS Chapter 535 and NAC Chapter 535. The removal or decommissioning of a dam requires approval of an application and plans for the decommissioning of the dam pursuant to NAC 535.220.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Water resources	Maintain existing barriers that are intended to prevent springs from being driven through and trampled.
Comment period for "Draft Purpose and Need_508"	Nevada Department of Wildlife, Southern Region	29	Water resources	In the latter half of the 20th century, water availability was considered integral to enhancing existing habitats or remedying water as the limiting factor for augmenting suitable wildlife habitat. A series of 32 low-volume water developments (aka guzzlers) were installed in 1960 and have been maintained for benefiting mainly upland species like Gambel's quail, desert cottontail, and songbirds. Monitoring of the historic desert bighorn population and habitat has similarly been ongoing. After much planning and consideration, two large volume guzzlers were established during the 2004-06 period primarily for benefiting desert bighorn. Additional large-volume guzzlers are proposed. NDOW in coordination and collaboration with the BLM facilitated baseline and distribution surveys of the desert tortoise prior to its ESA-listing and periodically performed into the 1990's until the current monitoring regime was assumed by the U.S. Fish and Wildlife Service as part of desert tortoise recovery efforts. NDOW has and continues investing in wildlife management investigations and actions including involvement in abandoned mine lands assessments for determining mine workings use by bats and other species and assisting in determining appropriate closure of openings posing public safety hazards. The result being installation of bat gates. Part of statewide investigations of the chuckwalla, a reptile species also of interest to the U.S. Fish and Wildlife Service and Clark County Desert Conservation Program were conducted in the Gold Butte area and facilitated by NDOW. Since the 2005 Southern Nevada Complex Fire, several of upland guzzlers were selected in what is now the GBNM as sites for post-fire habitat restoration efforts using containerized seedlings of native plants. And NDOW in the past two years has been coordinating with BLM on the possibility of post-fire treatments in the 2020 Virgin Peak Fire. Since the mid-1990's, the Gold Butte area has experienced dramatic increases in casual recreation associated with exponential population and development growth within a 100-mile radius. This advent has been concurrent with the extended drought in the West which perhaps is reflective of a more outwardly expression of climate change. Increased potential for greater frequency of wildland fire, warming temperatures, and uncertain precipitation patterns may have profound influences on biological processes and wildlife populations. In this light and the public input BLM has received, we believe we understand and appreciate the challenges in protecting and conserving the diversity of natural resources in the Gold Butte region.

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Comment period for "Draft Alternatives_508"	BlueRibbon Coalition	23	Fire management	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. 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.
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Socioeconomics and environmental justice	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. A thriving economy, tied to the Monument, would be a very positive amenity for the quality of life in the area.
Comment period for "Draft Alternatives_508"	BlueRibbon Coalition	23	Socioeconomics and environmental justice	Many of our members hold organized events that include organized rides in this area. A significant portion of the education mission of organizations like ours and the fundraising that supports organizations like ours comes from these organized events, and we see the continuation of these events as an integral expression of protected rights including freedom of speech and freedom of assembly. 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.
Comment period for "Draft Alternatives_508"	BlueRibbon Coalition	23	Socioeconomics and environmental justice	The Executive Order on Advancing Equity also recognizes that poverty and inequality can lead to systematic discrimination against historically underserved and marginalized communities. We strongly encourage the BLM to incorporate into their planning the findings of <i>The Slums of Aspen: Immigrants vs. the Environment in America's Eden</i> by Lisa Sun-Hee Park and David Pellow and <i>Billionaire Wilderness: The Ultra-Wealthy and the Remaking of the American West</i> 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. 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.
Comment period for "Draft Alternatives_508"	BlueRibbon Coalition	23	Socioeconomics and environmental justice	Consider this passage from <i>Billionaire Wilderness</i> 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.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Cultural resources	Cultural Resources. Protect the multitude of delicate cultural resources in Gold Butte. Preserve the undeveloped and not-publicly-documented status of sites significant to local Tribes. In areas where cultural resources are publicly known and highly visited, install interpretive signs to encourage responsible recreation and preservation of those resources.

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Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Cultural resources	Recommendations on managing sensitive cultural sites: -To the extent feasible, sites important to Indigenous Peoples (except the Newspaper Rock and 21 Goats areas) should remain undeveloped and generally not publicly documented. This includes keeping the little visited Grotto area primitive except for improving the trail down the steep hillside. In the Newspaper Rock and 21 Goats area, the area beyond the closed roads should remain as primitive as possible with the exception of improving the foot trail connecting Newspaper Rock and 21 Goats. Indigenous Peoples should be consulted on this topic. -In the heavily-visited Newspaper Rock area, formal foot trails should be developed with directional signs to mitigate further degradation caused by heavy use. Additionally, interpretive signage (including signs promoting "leave no trace" trail ethics and preservation of rock art) should be placed along the designated trail and at sites of interest in the area.
Comment period for "Draft Purpose and Need_508"	N/A	25	Tribal interests	One of the main attractions of Gold Butte for tourists is the large number of petroglyphs. Many Americans of non-native origin view them as interesting while native Americans mostly view them as a key part of their heritage and history. It is imperative that the Plan provide for protection of petroglyphs, pictographs and other native American artifacts from vandalism as well as inadvertent damage from the actions of ignorant or uncaring visitors.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Tribal interests	Tribal Involvement. Adopt a process that places the Moapa Band and Las Vegas Paiute tribe in a position that directly and strongly influences the components in this plan, including direct consultations with tribal leaders. Additionally, we would like to see these tribes involved in the development of interpretation materials and facilities that are developed.
Comment period for "Draft Purpose and Need_508"	Kokopelli ATV Club and Virgin River Coalition	13	Public health and safety	Hopefully. um, we've put in grants through the Virgin River Coalition and through the Kokopelli ATV Club here in Mesquite to put additional signage out there to make it easier for people to find their ways way around and not get lost.
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Public health and safety	The Monument Plan must include a strategy for better law enforcement. It is rare to see BLM rangers or law enforcement in the area. With the growth in popularity of this area they must have more of a presence there. Funding for personnel, cameras, and prosecution for infractions like trespass into sensitive areas must be secured.
Comment period for "Draft Alternatives_508"	N/A	14	Public health and safety	The addition of a viewing platform at Devil's Throat would be good for safety. I'm sure many people who visit hop the fence for a better view right now.
Comment period for "Draft Alternatives_508"	N/A	17	Public health and safety	Provide a permanent Ranger policing the monument. I see posts of side x sides riding though washes that are not designated roads fairly often.
Comment period for "Draft Purpose and Need_508"	N/A	25	Paleontological resources	One of the most tantalizing recent discoveries in the Gold Butte area are the prehistoric fossil trackways of animals that predate the dinosaurs. Significant effort needs to be devoted to exploring for more of those trackways and protecting them before people damage or steal them.
Comment period for "Draft Purpose and Need_508"	Desert Tortoise Council	21	Threatened, endangered, and sensitive species	Whereas Alternative D (Management for Use and Resource Protection) is most closely aligned with our mission to protect tortoises and Alternative C (Increased Recreation Use) is least likely to support our mission, we understand that the BLM is not so much interested in our preferences as it is with our constructive input to implement the plan in such a way that tortoise conservation and recovery are promoted throughout the GBNM, particularly in designated critical habitats. There has been a disturbing trend in BLM decisions, particularly in California, to opportunistically introduce new recreation opportunities without regard to its mandate and responsibility to conserve and promote recovery of threatened species, including the desert tortoise. The designation of Special Recreation Management Areas (SRMAs) and Extensive Recreation Management Areas (ERMAs) in designated tortoise critical habitats throughout California (BLM 2016) and subsequently expanding the Stoddard, Johnson Valley, and El Mirage off-highway vehicle open areas into critical habitats under the 2019 Dingell Act demonstrate that BLM is willing to favor recreation at the expense of tortoise survival and recovery. Similarly, the decisions to allow unrestricted recreation vehicle use on Cuddeback and Coyote lakes that are surrounded by the Fremont-Kramer and Superior-Cronese critical habitat units, the introduction of competitive events into the Ord-Rodman Critical Habitat Unit, etc. (BLM 2019) is disturbing given the data available at the time of those decisions that tortoises had already declined by 50% in the Western Mojave Recovery Unit. The relevancy of this information to the current proposal is that to adopt Alternative C would be a move by the BLM in Nevada in the same direction as the BLM in California, which is weakening tortoise recovery at a time when we can least afford to favor recreation over habitat protection.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Threatened, endangered, and sensitive species	Install fencing in new locations to protect sensitive plant and animal species, such as relict leopard frogs, from trampling by non-native animals such as cattle and burros.

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Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	18	Vegetation	Certainly, I would say that invasive plants and animals are something that really needs to be looked at, because once those things get established it's very difficult to get rid of them. So I would just say things like Sahara mustard, which are all the way out almost, if not to, Whitney Pocket now. All along the by way, there that we're something that really deserves attention, and it's going to cost money, but it needs to be something that everybody's aware of and working on or we're essentially going to lose much of the value here if um invasive plants and potentially animals take over this area.
Comment period for "Draft Alternatives_508"	N/A	19	Vegetation	There are a number of invasive plants in the Gold Butte Region. Schismus and brome grass already are well established and have changed the fire ecology of the area. These species are now beyond control. Sahara mustard likely is already established and beyond control as it spreads up washes from the shores of Lake Mead. Other species are not yet fully established, and the BLM should implement aggressive plans to control these species. For example, saltcedar, puncturevine, Russian thistle (tumbleweed), and horehound are widespread outside the monument, but not inside. The BLM should implement plans to eradicate weeds from the monument, but focus efforts on species that yet might be controlled.
Comment period for "Draft Purpose and Need_508"	N/A	25	Vegetation	Lastly, the single greatest threat to the native plants in the Monument and the ecosystem that they support is invasive non-native plants. Protecting the diversity of the native plant community and a concerted long-term effort to control non-native invasive plants is essential if the Gold Butte National Monument is going to fulfil its potential as a resource for the American public and needs to be an integral part of the management plan.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Vegetation	Invasive Vegetation. The introduction and proliferation of invasive plants in Gold Butte is a huge issue because of their potential to reduce the amount of native plants by dominating the landscape, reducing plant diversity, and increasing fire vulnerability.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Vegetation	Control invasive vegetation (such as tamarisk and palm trees) in riparian areas and revegetate with acacia, cottonwood, or other native plants.
Comment period for "Draft Purpose and Need_508"	Western Watersheds Project	30	Vegetation	Map and study the highest-quality habitat for each vegetation community type and determine how best to protect them from human influence and disturbance so threatened and sensitive species have the best chance of long-term survival as part of your preferred alternative. The Bureau should be prepared to close existing roads if this offers the best solution for protection. OHV riders are notorious for illegally traveling off-route, crushing vegetation and tortoise habitat.
Comment period for "Draft Alternatives_508"	N/A	20	Wildlife	Ravens eat tortoise hatchlings and juveniles. Eggs in raven nets should be oiled to reduce raven reproduction.
Comment period for "Draft Purpose and Need_508"	N/A	6	Recreation	It is imperative to keep our public lands public. Gold Butte is a beautiful monument in which many people flock to in order to remember its history. Shutting Gold Butte down would be a great mistake, as many people visiting the monument respect the natural landscape. Many people are actively rallying against privatization and will continue to rally to keep our PUBLIC lands PUBLIC.
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Recreation	The I P & E A 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. 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 if and when the time comes.
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Camping	Camping: The current situation is not sustainable in the long run. During midweek and non-peak weekend periods there are no 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, especially in the Whitney Pocket area, may require reservations at some point soon. Some areas, such as Gold Butte townsite could accommodate more camping than is in current use and should be encouraged.
Comment period for "Draft Alternatives_508"	BlueRibbon Coalition	23	Camping	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.

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Comment period for "Draft Alternatives_508"	BlueRibbon Coalition	23	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. 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. 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.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Camping	A designated campground with limited amenities (e.g., metal fire pits at ground-level and picnic tables) should be established in the Whitney Pocket area to help confine the camping "footprint" to designated areas, thereby minimizing the effects on the monument as a whole.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Camping	While a designated campground should be established in the Whitney Pocket area, scattered campsite facilities (e.g., metal fire pits at ground-level and picnic tables) should be developed at popular sites in the northern and central portions of the monument (e.g., Little Finland, Gold Butte Townsite, and Cabin Canyon). Camping in southern sections of the monument should remain dispersed and primitive.
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Facilities	More parking is needed at popular trailheads and central areas to accommodate hikers, horse trailers, and 4WD users. When there is not enough capacity, people are parking on roadsides or nearby on previously undisturbed areas. 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. As more visitors discover the Monument garbage must be addressed. The current practice of carrying out everything you bring in works well. It is suggested that a dumpster be placed in the parking lot where the Gold Butte Road intersects with Highway 170. The practice of Leave No Trace will continue to work for many visitors but the BLM should make it easy for all users.
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Facilities	The information signs and kiosks that are currently located at the entrance to Gold Butte and around the Monument are very helpful. More needs to be done to educate users about the sensitive areas in the Monument and encourage more Leave No Trace practices. We look forward to an information center for visitors, presumably located in the town of Mesquite.
Comment period for "Draft Alternatives_508"	N/A	14	Facilities	The sign installation is great. Please remember the caps on the posts for the bird protection. We had to put duct tape on them.
Comment period for "Draft Purpose and Need_508"	Center For Biological Diversity	15	Facilities	Um, I think we support uh increased recreational access to Gold Butte but um Gold Butte desperately needs toilets right now. That's like a urgent need is toilets at facilities. Certainly, certain popular areas like Whitney Pocket and elsewhere are getting heavily impacted, and just need more uh amenities and more hardened surfaces in order to accommodate the people. I also think the Fallen Man Petroglyphs site right now there's nothing there at all. So certainly like a toilet and an interpretive sign, I think, are essential to protect that area from impacts of overuse and an unmanaged use. So, in general, we are supportive of the idea of more recreational infrastructure in Gold Butte to protect the tortoise habitat and protect the resources from unmanaged use.
Comment period for "Draft Alternatives_508"	Kokopelli ATV Club and the Virgin River Coalition (VRC)	16	Facilities	We also want to work with and partner with the BLM and Gold Butte Monument, the City of Mesquite, the Friends of Gold Butte, to make improvements which make travel easy and safe in the Gold Butte Monument. To do this we want to construct and maintain recreational areas such as rest stops, camping areas, signage at intersections so people do not get lost, and help maintain roads so they are safe and navigable for appropriate vehicles, etc. We have submitted grant applications for additional signage which will identify the road or trail people are on, whether this road and others take you toward Mesquite, what the GPS coordinates are of your current location, and whether this is the habitat for a threatened or endangered species that you should look out for.
Comment period for "Draft Alternatives_508"	N/A	17	Facilities	Increased visitation is a certainty. Provide toilets at Whitney Pockets, Devils Throat, Newspaper Rock, Little Finland, Seven Keyholes, Gold Butte Townsite and Cabin Canyon.
Comment period for "Draft Purpose and Need_508"	Kokopelli ATV Club and Virgin River Coalition	17	Facilities	We need to partner more with the BLM, find grants, uh go out and create these facilities that are needed out there, whether it's restrooms or signs uh both of the organizations that I've worked with are working with, uh do that on an ongoing basis. We do regular, clean up efforts. We have placed hundreds, literally hundreds of signs out on BLM land uh helping people stay on the primary major roadways find their way and not get lost, And that's important to visitors, especially uh that come in from outside this area. I work with search and rescue, and I know why people get lost out there, and it's because there's trails all over the place, and there's no markings on those roads or trails, and so they make one wrong turn after another and get lost. And uh, this climate is pretty threatening to people that uh have to spend the night out there, whether it's in the summer, or whether it's in the winter. Certainly, they don't go out there thinking you're gonna spend the night. They're not equipped for it. They're not dressed for it. So um, we need to make it easy for people to visit and enjoy these areas, and at the same time we need to, and uh, my signs include that, uh, whether these are uh habitats for endangered species. Uh, we need to tell them that they need to stay on the roads, especially in the areas where um and look out for the desert tortoise. The tortoise doesn't know the difference between the road and the other area. Uh, and so we don't uh potentially run over those.

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Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	18	Facilities	We also need to think about facilities. Everybody thinks we need more toilets and whatnot uh trash cans. When you put a trash can out, people will fill it, and that means somebody has to empty that. And I would suggest that we really emphasize people to remove their trash, take it with them rather than have to pay public employees to go out and clean up after them. Um, also, just be aware that in some cases um facilities attract more people that would ordinarily not have come to that area.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Facilities	Install parking/staging signs at areas being used as such, and build post barriers around these areas so they don't continue to get larger and larger, as has successfully been done in some locations in the Monument.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Facilities	When creating interpretation materials, include information about how vehicle use off of designated routes can spread invasive weeds, increase the fuel load for wildfire, and start wildfires. Also include information about how trailer chains can start wildfires.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Facilities	Waste. Address litter and waste issues at high use locations, such as Whitney Pocket, Newspaper Rock, Little Finland, and the Gold Butte townsite. Consider installing permanent toilet facilities.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Facilities	Education. Install informational kiosks at entry points to the Monument.
Comment period for "Draft Purpose and Need_508"	Western Watersheds Project	30	Facilities	Immediately begin the process for installing toilet facilities and dumpsters in high-use areas.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Facilities	In general, the overall philosophical approach recommended by FoGB is to focus on maintaining the wild and remote nature of the Gold Butte lands, but doing it in a way that facilitates travel in certain areas (e.g., maintained roads, road signs), adding recreational infrastructure where needed to protect the Objects and Values (e.g., campgrounds, toilets, non-motorized trails), while generally maintaining Lands With Wilderness Character in their existing state.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Facilities	Vault toilets with trash receptacles and educational kiosks should be installed in high use locations (e.g. Whitney Pocket, Newspaper Rock area aka "Falling Man", Little Finland, Gold Butte Townsite, and White Rock in Cabin Canyon) to mitigate visitor impact.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Facilities	A visitor center should be established. A good location for a visitor center is along Gold Butte Road somewhere past the horse ranches and overlooking the Virgin River. Such a location would be scenic and easily accessible by visitor center staff commuting from Mesquite, and it might encourage travelers on I-15 to stop in. Placing the visitor center outside the monument would reduce environmental damage inside the monument. -At the visitor center, interpretive exhibits should include brochures and maps of the frontcountry natural resources in the area. -Exhibits should also include information about the primitive nature of the backcountry as well as "leave no trace" guidelines. -Basic safety information should be readily available, including information on weather, lack of easily accessible amenities, and changing road conditions. -Additional information might include: the fragile desert ecosystem (e.g., cryptobiotic soils, native wildlife, desert tortoises and why you should not disturb them, and native plants), local geology, human history in the area (e.g., Native American and pioneer history; petroglyphs and pictographs), maps with marked trails, rules and regulations, and safety information (heat injuries, 10 Essentials, emergency phone numbers). -Signs and brochures should be posted for the cycling community to ensure that they understand they must stay on designated roads to protect fragile desert soils.

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Facilities	Recommendations on signage, place names, and materials: -Information kiosks should be placed at primary GBNM entry points with information about the primitive nature of the backcountry as well as "leave no trace" guidelines. Basic safety information should be readily available, including information on weather, lack of easily accessible amenities, and changing road conditions. -Place names should be established (informally without recourse to the USGS Geographic Names Information System) to create a common language for Gold Butte visitors in describing sites. In general, place names should reflect geographic locations (e.g., Mud Wash Corral), native names (established in consultation with Indigenous Peoples), or pioneer names (e.g., Gold Butte Townsite). Place names should not reflect the names of modern white humans or their dogs (e.g., not Kirks Grotto and not Babes Butte). -An updated signage plan should be developed that includes updated placement for road signage, historical markers for key cultural sites, ranches, and mines in the area. -OHV educational materials. Given the considerable OHV use in the monument, the Implementation Plan should provide management direction for the creation and dissemination of GBNM specific OHV education and usage materials. These materials should be created in collaboration with the OHV commission, area OHV clubs, and other GBNM constituents. Using the 2008 Travel Management Plan, publish and provide to the public maps and information on existing OHV looping routes. Looping routes appeal to OHV users and may help alleviate wear and tear on roads having only in-and-out access.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Hiking	Trails. -Analyze the adoption and designation of user-created trails, focusing on areas where reduce the amount of resource damage and reduce paralleling or otherwise redundant paths. -Designate non-motorized trails that will draw users to areas with less fragile resources. -Maintain designated trails to a standard that is safe and will prevent resource damage. -Create and maintain multiple miles of trails that can be accessed by people using wheelchairs. There is a deficit of such opportunities in the Southern Nevada District. We suggest you work with the Trail Access Project to identify areas that can be developed as such
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Hiking	Foot trails should be designated or constructed using, to the extent practicable, existing non-motorized trails that have emerged from visitor use over the years. Such trails should have directional, interpretive, and educational signs to the extent such signage does not interfere with or detract from backcountry experiences in the monument. Popular trails should be "hardened" to mitigate degradation imposed by heavy usage and to reduce multiple-trailing in popular areas.
Comment period for "Draft Purpose and Need_508"	N/A	7	Horseback riding	As a trail rider and horse camper, I would like to see Gold Butte National Monument remain open and accessible to equines. If you are contemplating a permit-only entry policy, I would like to go on the record to oppose that. I attended your Zoom meeting earlier in the year, regarding Gold Butte National Monument and voiced a request to have upgraded equine facilities within the Monument to make equine camping more accessible. i.e. equine parking/camping area, maintained equine trails, water sources available for equines.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Horseback riding	An equestrian staging area should be developed in the Whitney Pocket area (with trailer parking, vault toilets, trash receptacles, and informational kiosks) that provide reasonable separation from non-equestrian staging areas.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Horseback riding	A designated equestrian campground with limited amenities should be established in the Whitney Pocket area, but separated from non-equestrian camping areas to reduce conflicts between groups (e.g., OHVs scaring livestock) and to reduce the stench of livestock urine, feces, and decomposing hay in non-equestrian camping areas. Amenities in equestrian camping areas should include corrals, hitching rails, and similar amenities, but not water sources.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Horseback riding	Equestrian trails leading to popular equestrian photo-sites in the Whitney Pocket area and in the Amber Cat-Doodlebug canyons area should be established to reduce overall trampling of open spaces due to heavy traffic that has created multiple-trailing in popular areas. Equestrian riders should be encouraged to stay on designated trails in popular areas such as between Whitney Pocket and the sandy areas beyond 21 Goats.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Mountain biking	In a designated area (a suggestion would be using the mining roads above the White Rock trailhead in Cabin Canyon), a mountain biking area with designated and hardened trails should be considered. This is a recreational use in Gold Butte that will grow and should be managed and targeted to a selected area rather than just having random, unmanaged use in the monument. An effort should be made to connect with the cycling community to ensure that they stay on designated roads.
Comment period for "Draft Alternatives_508"	N/A	3	Off-highway vehicle use	GBNM further faces problems from increasing public visitation and recreation. OHV uses can be especially destructive when cross-country riding creates new illegal routes and fragments sensitive desert habitats.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	18	Off-highway vehicle use	Second thing I would say is that we need to get a handle on OHV traffic. When I'm out there, and I see convoys of, you know, fifteen to twenty OHV all traveling together as a group, this becomes problematic when they meet somebody on a narrow one-lane road. Basically, either they go off the road and drive around, or somebody else does. And we basically have disturbance that we shouldn't really be having off of designated travel routes.



Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Alternatives_508"	N/A	20	Shooting	Recreational target shooting should be prohibited in the monument and limited to designated target ranges on BLM lands outside the monument.
Comment period for "Draft Purpose and Need_508"	N/A	25	Shooting	Recreational shooting is a controversial subject but must be addressed because the vast majority of recreational shooters do not use appropriate target material, do not clean up their litter and are ignorant or unmindful of the fire danger associated with target shooting, particularly when using steel core ammunition. In addition, lead is an element which lasts forever so contamination by lead based ammunition is an issue to be considered. This subject is probably best addressed as a littering issue in order to avoid the question of Second Amendment rights. The best policy would be to not allow target shooting.
Comment period for "Draft Purpose and Need_508"	N/A	11	Special recreation permits	I wanted to emphasize the fact that we need to have some kind of special use permits. If I do take my ten thousand friends out to Falling Man next week, um, I'll be out there and be gone, and huge amount of environmental damage will be done before you guys know about it. Um, and then decide that it's not okay. Um, so something needs to be done proactively for that.
Comment period for "Draft Alternatives_508"	N/A	19	Special recreation permits	A special recreation permit system should be implemented and used to control commercial activities and large-group, non-commercial activities. The goal of such a permit system should be to protect the Objects and Values of the monument by, in part, limiting the size of groups. The BLM should define "large groups" and require a special recreation permit for them to operate in Gold Butte. As we know, large groups of hikers and off-road vehicles currently are using Gold Butte. In these cases, large groups can overwhelm established trailhead parking areas and spill over into the desert, thereby damaging the habitat. They can also block other users from using filled-up trailhead parking. Furthermore, large groups of hikers can inadvertently create new trails when hiking in remote, trail-less areas, scars that can last for years in the desert environment. By implementing an aggressive special recreation permit system, the BLM would better protect the Objects and Values of the monument.
Comment period for "Draft Purpose and Need_508"	N/A	20	Special recreation permits	I want to go on record as a as being an advocate of limiting group size. We uh well, yesterday uh Jim Boone uh made the passing comment on it, but I think that it's something that really has to be with whatever option is implemented. It has to be part of any option, because we now have, as mentioned earlier this evening. Um uh ATV groups of twenty or more that are doing, whether formally or informally, uh going out uh together. We have uh, my experience, we have equestrian groups of about fifteen, twenty people that uh that are going out, and the impact of hiking groups. If you get the twenty or thirty people in a hiking group, these, uh these large groups have a have a detrimental impact beyond what the smaller groups would do, and I'd like to see part of the plan, whichever is implemented, and that it include, whether it be a simply a restriction of group size or a requirement for permits above it certain group size for whatever user group it is that that be part of the implementation plan.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Special recreation permits	Require permits for groups of more than five vehicles.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Special recreation permits	Special Use Permits. Consider when special use permits should be required in the Monument, beyond current considerations.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Special recreation permits	A special recreation permit system should be implemented and used to control commercial activities and large-group non-commercial activities. The goal of such a permit system should be to protect the Objects and Values of the national monument by, in part, limiting the size of groups.
Comment period for "Draft Alternatives_508"	N/A	8	Access	The Nevada desert is a special place, one I was fortunate to grow up in and call home. It is also a stubborn place, a difficult place, one that doesn't make friends easily. That's why it's vital that the BLM prioritize public access in its planning of the Gold Butte National Monument - so that Nevadans today, and in the future, can learn and appreciate this special corner of the Mojave Desert.
Comment period for "Draft Alternatives_508"	N/A	8	Access	There will, of course, be those who say that the best protection is limited access to people. But you can't love what you can't see. If we want a sustainable, durable appreciation for Gold Butte, now and for generations to come, we need to make it as easy as possible for people to have that deep connection to Gold Butte - one that can only come from seeing the Whitney Pockets in person, from walking to the edge of Devil's Throat, from climbing boulders at the Gold Butte town site or from marveling in the rock formations at Little Finland. This does not mean that the overwhelming hordes will descend upon Gold Butte. There are plenty of magical places that have paved roads and visitor facilities but are well-managed. There's no waiting list to visit the Amargosa Canyon or Ash Meadows. Nobody would argue the Mojave National Preserve is in jeopardy of over visitation. But allowing access allows human connection - which is what Gold Butte needs more than anything except protection.

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Alternatives_508"	N/A	8	Access	When I grew up in Las Vegas, "visiting the desert" (without a 4WD vehicle) meant either going to Red Rock, or pulling off the side of the road and going target shooting. The opportunities for structured visitation, and appreciation, of the desert's resources and landscapes were extremely limited. The SNPLMA has helped with that, and has opened up new areas to public visitation. But as the desert's population has grown, so has the strain on the places that we love to death. Part of the answer has to be to make it easier to visit, and learn about, new areas that were otherwise inaccessible to the public.
Comment period for "Draft Alternatives_508"	N/A	10	Access	As a resident of Mesquite NV, I am very concerned about maintaining all existing public access within Gold Butte Monument. My access is through the use of OHV's, motor vehicles, and hiking. I occasionally escort friends and family to these areas within Gold Butte Monument and need open OHV access as some of these folks are handicapped. Consistent with the ADA, the BLM has a responsibility to promote handicapped access to the Gold Butte sites. As a member of the local Kokopelli OHV club, we take great pride in preserving these areas and items of cultural significance and coordinate with the Nevadans for Cultural Preservation to advance those goals. Please do not consider any option that restricts our right as citizens to maintain handicapped access to the public land that is ours. By not restricting access for the less fortunate, the BLM is working within the goals of Executive Order 13985, which Advances Equity for those underserved, and is advancing the financial objective of the order by promoting the economic impact that OHV and outdoor recreational use has on our economy.
Comment period for "Draft Purpose and Need_508"	Kokopelli ATV Club and Virgin River Coalition	13	Access	The other issue which I put a question in earlier on, and my computer unfortunately lost its signal, so I didn't hear the answer, but I'm very concerned about closing off areas of, especially when they have been open in the past to various cultural sites, uh various locations, like - well, Twenty-one Goats is one good example. Generally in the BLM, you could drive in any of the washes, because they know the washes don't get um changed, so they change every year when the water comes down them so you're really not providing any environmental damage there in that one. You used to be able to drive all the way to the cultural site there, and you can't anymore. Um, shutting that off, putting up barricades, and that's been done in other areas also, eliminates the opportunity for people with handicap to be able to access those areas. Um, Mesquite, the area that I live in, uh has a lot of retired people, and one of the things that we enjoy recreationally is to be able to get out and go to various different places, and certainly Gold Butte has a lot of those uh sites to go to. But if we can no longer walk, then those areas are shut off to us, and I would encourage the Monument to look at areas that could be more open and available to people with handicapped. I don't think the BLM should discriminate against handicapped people, while allowing others to visit there. Either it should be open or it should be shut off.
Comment period for "Draft Alternatives_508"	Kokopelli ATV Club and the Virgin River Coalition (VRC)	16	Access	The second issue we are concerned about is access especially for people who are handicapped and disabled. Recently more roads and washes have been closed to vehicles that could access popular cultural and recreational areas. If areas are to be closed to protect them we should not discriminate against certain groups. In fact it's questionable as to whether this unfair discrimination is legal under the federal laws regarding the handicap. These often older and disabled people are not likely to damage property and in fact quite the opposite are probably more likely to protect it and report people that are damaging it. Almost 100 Kokopelli ATV Club members have signed the attached petition asking the BLM and Gold Butte Monument to address this important issue. While we all want to protect our valuable natural resources but in doing that we want to make them accessible to everyone and not on fairly discriminate against some members of our community. Please see the attached petition.
Comment period for "Draft Purpose and Need_508"	Kokopelli ATV Club and Virgin River Coalition	17	Access	Um, I've already expressed one concern last night, and it still concerns me, and that is um how we make this available to people with disabilities. We have closed off some areas um that make accessibility only by foot, and many of the people, especially retired community, like Mesquite is can ride in a vehicle, but they cannot walk long distances, especially over rough ground, so some of the areas are unavailable to them. I'd like to see how we might fix that or change it, or give them some kind of special uh access to these areas. Because while I realize there's some potential damage to any of these areas, I don't think these are the people that are doing it. Uh, but they are the ones that are suffering because they do not have access anymore.
Comment period for "Draft Alternatives_508"	N/A	17	Access	Provide a road access for 4wd vehicles to the mouth of 7 Keyholes, it's just too hard a hike for older folks. It appears that side x sides are bypassing the barrier around the parking area on the hill and driving down there anyway.
Comment period for "Draft Purpose and Need_508"	N/A	19	Access	I we need some management. The roads need maintained. We need to figure out some kind of a plan for it to work. But closing these areas off and taking away from the use of my grandchildren and their great grandchildren and making it so they are not even going to have any accessibility is not acceptable in any way.
Comment period for "Draft Purpose and Need_508"	N/A	19	Access	I've been involved in tourism. I've been involved with my own camping, and stood side by side during projects for volunteering. We love our roading, we love horse decorating, and we also love hiking, and we do believe some of these areas seem to be kept beautiful and pristine. But how good is that if nobody can go see them? There are many people who have disabilities. Many people who wouldn't ever have access, elderly and young children that we need to protect them, too, not just uh the areas that are considered to be environmentally impacted by our human contact. It needs to be considered both ways and humans are just as valuable as plants, if not more.

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Alternatives_508"	BlueRibbon Coalition	23	Access	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. 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. Management policies focused on "minimizing" the environmental impacts of motorized recreation has 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 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 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 route closures in the Gold Butte National Monument would disproportionately harm disabled users' ability to access public lands. 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. 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. Motorized access provides the best opportunities for those with disability access issues and this is the best resource for the BLM to comply with the Equity Action Plan. 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. 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.
Comment period for "Draft Purpose and Need_508"	N/A	11	Road maintenance	There's a Travel Management Plan that theoretically our roads that are open and um a lot of them are in very bad condition, and we need to have some kind of a formal process to keep the roads open, to include um brushing the roads, keeping the growth back from the sides. A lot of the roads in Gold Butte are only one lane wide, and when the bushes grow out, there's no way to get around them without damaging the paint on our vehicles. Other places often have roads that are two lane wide and you can drive down the middle and stay a clear of the bushes.
Comment period for "Draft Purpose and Need_508"	Kokopelli ATV Club and Virgin River Coalition	13	Road maintenance	Um, Jim had a great point about the road conditions out there. I'm aware of those also, and we need some kind of ongoing plan for road trail maintenance in Gold Butte.
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Road maintenance	Roads should be maintained at least at current level with thought given to some minor improvements as needed for safety. Parts of the 2008 Travel Management Plan should be revisited. More monitoring and enforcement are badly needed in some areas. The paved section into the Monument needs to be maintained better with potholes filled and some sections repaved. The gravel roads to Gold Butte townsite and Aravada need to be routinely graded to minimize rocks and wash-boarding. All other roads should receive only minimal maintenance to repair washouts or other issues.

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Comment period for "Draft Alternatives_508"	Kokopelli ATV Club and the Virgin River Coalition (VRC)	16	Road maintenance	We hope to formalize these partnerships by constructing MOUs with the BLM that allow us with the direction and approval of BLM management to do things like road/trail maintenance and trash pickups on an ongoing basis. We also intend to continue with the BLM's approval and guidance to do regular large trash clean ups where we will bring larger groups and sometimes larger equipment to remove trash and participate in restorative efforts to remove invasive species and replant native species. Two problems are of significant concern to the Kokopelli ATV Club and the Virgin River Coalition. The first problem is a concern with road/trail maintenance that is an ongoing and often urgent problem that the BLM does not seem to be able to address in a timely manner. The City of Mesquite is applying for a grant to purchase an excavator that could be used for various projects and address issues of road/trail maintenance. They are willing to share this equipment with their properly trained and certified volunteers partners to help the BLM/Gold Butte Monument with various projects and ongoing road and trail maintenance. This could be a win-win for everyone.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	18	Road maintenance	One of the issues that needs to be looked at is road maintenance with climate change. We're seeing increased intensity of thunderstorms and water is the enemy of roads. So, need to look at how many drains there are on roads, how frequent those are, and that's a function of grade and soil, type. Um. So that's something that actually needs to be part of the part of the plan is how you will maintain roads to to deal with um increase frequency of severe thunderstorms. We also need to probably take a look at some of the travel routes. Um, I know there's a lot of contention when those were set up, but some of those are really not sustainable, and the ones that are should basically probably be allowed to just lapse rather than become um ultimate challenge for somebody with a incredibly strong off-road vehicle.
Comment period for "Draft Alternatives_508"	N/A	19	Road maintenance	The BLM has designated some 300 miles of roads in Gold Butte. To enhance recreational experience and to promote safe travel in Gold Butte, the BLM should maintain these roads to the degree that a standard 4WD vehicle can traverse them without damaging the suspension, undercarriage, or paint. As we know, when roads wash out, people will drive into the desert to find a way around. Also, when roads get too bumpy, drivers will find more comfortable routes paralleling the original road. Establishing a roads maintenance program will help protect the Values and Objects of the Monument by keeping people on designated roads. There is an equity component to the issue here too: when roads get bad, only people who can afford ATVs, UTVs, and jacked-up jeeps can drive the roads.
Comment period for "Draft Alternatives_508"	N/A	19	Road maintenance	Some Gold Butte roads are on lands managed by Lake Mead National Recreation Area. The BLM should pressure Lake Mead to resume maintaining roads on the lands they manage. Twenty years ago, we could get small camper trailers down Devils Cove Road. Because Lake Mead abandoned their maintenance program, that road now is difficult for jacked-up jeeps, and all other visitors are kept off our public lands.
Comment period for "Draft Alternatives_508"	N/A	19	Road maintenance	On Gold Butte Road, between about St. Thomas Gap Road and Horse Wash, there are several places where drivers head off-road and attempt hill climbs in the mud hills. In problematic and potentially problematic areas, the BLM should reinstall smooth-wire fencing to close access to mud-hill climbs. Smooth-wire fencing worked after the Tramp and Fork Fire, so it likely would work again. Where wooden bollards are installed, they look awful and block access to only small areas. There are other areas where off-road hill climbing is a problem; the BLM should make a plan for managing these areas to better protect the Objects and Values of the monument.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Road maintenance	Identify which types of vehicles are suitable for the designated routes that were identifies in the 2008 Travel Management Plan (sedan, 2WD high clearance, 4WD high clearance, UTV, etc). Maintain the designated routes in Gold Butte to a level where vehicles identified as suitable in the recommendation above (or a standard 4WD vehicle) can travel the routes without damaging the suspension or underbody. We believe strongly believe that this will help prevent safety incidents in the Monument.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Road maintenance	Redirect high-impact recreation activities away from archaeological sites and other cultural resources by developing points of interest elsewhere, and by maintaining roads and road closures.
Comment period for "Draft Purpose and Need_508"	Arizona Strip District Office Bureau of Land Management	31	Road maintenance	Access roads to Tassi and Pakoon Springs through St. Thomas Gap and Whitney Pass and the main routes through GBNM continue to deteriorate. Regular maintenance and improvements are needed to maintain both public and agency access to both monuments. I. The ASD proposes to work with the SNDO to determine options for ensuring safe and consistent access on main routes through GBNM that access Tassi and Pakoon Springs area through Whitney Pass and St. Thomas Gap. We encourage thoughtful communication between our staffs to provide proper levels of road maintenance that is consistent with our respective RMPs, biological opinions, and monument proclamations.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Road maintenance	With respect to improving roads, the 2008 Travel Management Plan designated approximately 300 miles of roads in GBNM. To enhance recreational experience and to promote safe travel in GBNM, the BLM should classify roads according to vehicle categories (e.g., roads intended for sedans, 2-wheel drive high clearance, 4x4 high clearance, and UTV vehicles). Roads should be maintained such that vehicles meeting the vehicle category could safely travel the road without abnormal damage to suspension, body, or paint under normal conditions.
Comment period for "Draft Purpose and Need_508"	N/A	34	Road maintenance	I have read through your plan. I really feel the first priority is fixing the road going out to the Whitney Pockets. The other priorities I think follow that project.

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Route designations	There are very few established and maintained trails. This is leading to many informal social trails being created. There are foot, horse, mountain bike tracks frequently seen in previously undisturbed areas. Many users will follow Leave No Trace practices and stick to hard surfaces, washes, and existing cow and wildlife tracks, but not all. This off-trail traffic is leading to degradation of cryptobiotic soils, habitat, and the aesthetics of the area. Creation of some trails to popular sites are urgent. We could give many examples. Development of a Trails Master Plan should be included in the I P & E A process.
Comment period for "Draft Alternatives_508"	N/A	19	Route designations	On Gold Butte Road southbound, the first road past Whitney Pocket to the left (east) provides access for hill climbs that are out of view from Gold Butte Road. This area should be fenced or otherwise managed to prevent illegal, off-road travel. This road basically is a road to nowhere, other than the hill climbs, and should be considered for closing to better protect the Objects and Values of the monument.
Comment period for "Draft Alternatives_508"	N/A	19	Route designations	The road past Horse Spring ends, but people continue driving on the closed road and make a big loop that eventually returns to Gold Butte Road. This causes recurring damage to efforts along Gold Butte Road to rehabilitate the area, thereby encouraging other drivers to drive the road in the reverse direction. Efforts should be made at the end of Horse Spring Road to better block the road and end the habitat damage. There are a few other places where this type of situation continues to be a problem, and the BLM should make a plan for managing these areas to better protect the Objects and Values of the monument.
Comment period for "Draft Alternatives_508"	Conservation Lands Foundation	21	Route designations	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.
Comment period for "Draft Purpose and Need_508"	N/A	26	Route designations	Do NOT promote the creation of more OHV trails and roads. This is ill-advised in a national monument whose primary purpose should be the long-term preservation of the resource. There are plenty of extant OHV trails--no need to create more. Moreover, we have witnessed ATVs avoid barriers for protected areas like the 21 Goats cultural site. Any expansion of existing roads will only create more opportunities for misuse. We strongly disagree with one of the public commentators at the virtual meeting who suggested that barriers be removed for the benefit of individuals unable to hike to them. If you remove said barriers and harden the road to the site you are also easing access for vandalism and collection.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	16	Travel management plan	Similarly, roads identified in the 2008 Travel Plan should be designated for appropriate types of vehicles, such as sedan, two-wheel, high clearance, 4x4, ATVs, and maintains such that vehicles that meet these road designations can travel safely on the road without sustaining abnormal damage
Comment period for "Draft Purpose and Need_508"	N/A	25	Travel management plan	An effective, enforceable, and sustainable travel management plan has to be at the top of the list because that will circumscribe all the other human activities that take place in the area. In the last several years I have noticed a sharp increase in the number of large groups of off-road vehicles traveling in groups of ten or more per group. It would be very helpful if group size could be limited to five or fewer vehicles per group so that vehicles could more easily pass open two track ways and parking areas aren't overcrowded. The current de facto travel management plan is really no more than an inventory of existing roads, most of which were user created with little or no thought about sustainability or duplicity. Since roads, even two-tracks in the desert, last for decades or even centuries it is imperative that the road network be evaluated for sustainability and those roads, tracks or ways which are not sustainable and do not serve a useful purpose either be closed and rehabilitated or re-routed to make them sustainable. One of the impacts of climate change that is being seen in the desert Southwest is increased intensity of rainfall events and this is increasing erosion in general, but specifically impacting poorly laid out roads and user created roads with no drains. The Plan needs to address needed changes to road maintenance procedures in order to address the challenges associated with climate change. Specifically, unpaved roads need additional drains.
Comment period for "Draft Alternatives_508"	N/A	20	Unauthorized routes	A greater BLM law enforcement presence is needed to prevent or penalize illegal OHV use and route creation.
Comment period for "Draft Alternatives_508"	Conservation Lands Foundation	21	Lands and realty	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. 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. 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." In 2014, BLM initiated a Land Use Plan Amendment to the Resource Management Plan to allow new rights-of-way in the Birds of Prey National Conservation Area. However, it ultimately took an act of Congress to legally designate these new ROWs, as it is not within BLM's authority to grant a ROW in a National Conservation Area (and National Monuments). As such, we recommend the following management actions: -Designating the Monument 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.

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Purpose and Need_508"	Arizona Strip District Office Bureau of Land Management	31	Rangeland management	The Gold Butte Herd Management Area (HMA) in Nevada is directly west and abuts the Tassi - Gold Butte Herd Area (HA) in Arizona on GCPNM administered by the BLM and NPS. The ASFO RMP set the appropriate management level for burros in the Tassi-Gold Butte HA to zero. Currently, with no fence between the HA and HMA, wild burros travel back and forth over the Arizona/Nevada state line. Unauthorized cattle and/or horses (livestock) in GBNM can move east onto and impact active grazing allotments administered by ASFO and GCPNM (see map). Unauthorized cattle from GBNM can also move onto allotments that have been closed on Arizona BLM and NPS lands for the protection of the Mojave Desert Tortoise. Portions of the Mosby-Nay, Pakoon Springs, Tassi (BLM-administered) allotments are listed in the GCPNM RMP as unavailable for grazing. The Tassi Allotment (NPS-administered) is listed as unavailable for grazing in perpetuity. The Arizona Strip District recommends the following steps be taken to address this issue: 1. The ASD proposes to work with the SNDO to determine options for funding and implementation of active or passive exclusion measures to minimize movement of livestock and burros across the state line including active herding, gathers, placement of salt and/or mineral licks, and/or construction of a fence. 2. The ASD proposes to work with the SNDO and permit holders on both sides of the border to address trespass livestock crossing the state line into unauthorized pastures. Permit holders would be encouraged to come collect their livestock. If necessary, trespass notices would be issued. If gathers are necessary, branded livestock would be returned to their owners and unbranded cattle would be taken to auction.
Comment period for "Draft Alternatives_508"	N/A	1	Grazing	BLM should also focus on getting the DOJ to actively work to stop the chronic and harmful Cliven Bundy trespass grazing in the monument. This is an outrageous situation that undermines BLM credibility on monument planning and management.
Comment period for "Draft Purpose and Need_508"	N/A	3	Grazing	This planning is pointless. BLM should just ask Bundy what he might allow in his monument. For BLM, DOJ, and FBI, the repeated threats of violence clearly trump the Antiquities Act and GBNM Proclamation. The good guys have surrendered and the bad guys have won.
Comment period for "Draft Alternatives_508"	N/A	3	Grazing	Cliven Bundy's trespass cattle also continue to cause serious adverse impacts, including in critical habitats for ESA listed and threatened Mojave desert tortoises. It is incredibly frustrating that BLM has been unable or unwilling to stop this harmful trespass grazing. It also undermines BLM's credibility to adequately manage human uses in GBNM.
Comment period for "Draft Alternatives_508"	N/A	4	Grazing	Cliven Bundy and his militia followers control what does or does not happen in this "national monument." Bundy went rogue in the early 1990s and has been in charge ever since. BLM's ongoing cowardice and incompetence has only emboldened him. BLM Nevada apparently ignores how BLM Arizona eventually successfully stopped the Klump trespass grazing. Three words: contempt, jail, liens. Don't waste the public's time with illusory planning. BLM lost any credibility in this area long ago. In reality, Gold Butte is actually the "Bundy National Monument to Trespass Grazing."
Comment period for "Draft Purpose and Need_508"	N/A	5	Grazing	Cliven will "manage" the monument because BLM has consistently de facto delegated that role to him. For BLM, Cliven's cattle are more important than those pesky monument objects and values. Besides, threatened desert tortoises thrive on eating cow manure.
Comment period for "Draft Alternatives_508"	N/A	6	Grazing	There is no alternative that would end the nearly three decades of Bundy trespass grazing. No attempt to use the successful Klump trespass grazing remedies. No mention of the ongoing harm to monument objects from this illegal use. I am angry that BLM refuses to do its job and instead wastes public time and money on pointless planning.
Comment period for "Draft Alternatives_508"	N/A	7	Grazing	It is outrageous that BLM is apparently ignoring the figurative "500 pound gorilla in the room" during this Gold Butte National Monument (GBNM) planning process: the three decades of Cliven Bundy's destructive unmanaged trespass livestock grazing. This illegal grazing has and continues to harm the GBNM objects and values that BLM is supposedly required by law to protect. This abject failure undermines BLM's management credibility and the public's faith in any meaningful change from this new planning process. BLM Arizona learned many years ago how to stop the similar Klump trespass grazing. But BLM Nevada seems to ignore this critical lesson. Instead of prosecuting those who threaten violence against federal officials and the public, BLM rewards them by letting them do whatever they want without enforcement consequences.
Comment period for "Draft Alternatives_508"	N/A	7	Grazing	Biden and Haaland should not count GBNM as part of their "America the Beautiful" 30 by 30 commitment because Cliven Bundy is actually in charge and he is no friend of conservation.
Comment period for "Draft Alternatives_508"	N/A	9	Grazing	This monument planning won't result in positive outcomes unless BLM belatedly stops the ongoing and incredibly destructive Bundy trespass grazing. BLM did it for the similar Klump situation in Arizona so BLM can do it again in Nevada. The mid-terms are over, so any political concerns should now have abated.

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Purpose and Need_508"	N/A	10	Grazing	Second, there is no reference to stopping the current outrageous lawlessness in this monument - the seemingly endless Bundy trespass grazing and illegal range improvements. This damages monument objects and endangers public visitors. Planning is ridiculous when BLM won't even enforce the most basic federal statutes in a national monument.
Comment period for "Draft Alternatives_508"	N/A	11	Grazing	Cattle grazing has no place in this monument. It degrades resources and hurts tortoises and other wildlife. BLM should find innovative ways to stop the Bundy trespass grazing.
Comment period for "Draft Alternatives_508"	N/A	12	Grazing	Why does BLM ignore the Bundy trespass grazing in this monument planning? Why has BLM Nevada not learned from BLM Arizona's past success in stopping the similar Klump trespass grazing? Why can't BLM ask the DOJ attorneys to enforce the Bundy court orders, obtain a bench warrant for contempt, and secure liens on Bundy's property for failing to pay delinquent grazing fees and penalties?
Comment period for "Draft Purpose and Need_508"	N/A	14	Grazing	It's a travesty having cattle on the land out there running illegally, and um I will put most of my comments in writing.
Comment period for "Draft Alternatives_508"	N/A	14	Grazing	I know that cattle are not included in this plan but at least recognize they are there. Those of us who visit frequently know they are new cattle and their effects need to be monitored until more decisions are made.
Comment period for "Draft Purpose and Need_508"	Center For Biological Diversity	15	Grazing	Will BLM and Interior continue to allow Bundy's cows to run rough shot across this critical desert tortoise habitat? I mean, you can put up all the toilets and footpaths you want, but right now there are five hundred head of cattle in a place there should legally be zero, and if anyone says anything, you get an automatic weapon pointed in your face.
Comment period for "Draft Alternatives_508"	N/A	15	Grazing	The ongoing Bundy trespass grazing in the monument continues to be a huge embarrassment for BLM. This grazing violates a long list of federal statutes, regulations, policies, and current BLM RMP decisions. It also violates at least two outstanding federal court orders. BLM, DOJ, and FBI officials all share culpability for this egregious situation. Over the years, these officials have let politics interfere with law enforcement, and have demonstrated a pattern of cowardice and incompetence. This shameful pattern must end. It is past time for these officials to actively pursue the remedies that successfully ended the chronic Klump trespass grazing on BLM lands in Arizona.
Comment period for "Draft Alternatives_508"	N/A	15	Grazing	It is imperative that BLM effectively stop these ongoing deleterious illegal grazing effects in this national monument. Any BLM managers or staff who resist or stand in the way should be promptly fired. I care about this national monument and I know that it needs much better and more proactive BLM management. This BLM monument planning is a cruel hoax if the real problems like the Bundy trespass grazing are not resolved.
Comment period for "Draft Alternatives_508"	N/A	18	Grazing	The fact that these draft alternatives (including D) do not reference the need to end this trespass grazing shows that BLM has no intention of using the Klump or other remedies to hold Cliven accountable. This constitutes an appalling dereliction of duty by federal officials. For BLM, cowering to overt threats of violence is apparently more important than obtaining legal compliance or achieving resource protection in this national monument.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	18	Grazing	Also need to look at obsolete uh grazing improvements. That's fences, corral's, water troughs, and whatnot. Some of those will certainly stay, they're historic items been there a long time, but the ones that are a hazard to wildlife or interfere with wildlife need to be removed; that specifically fences more than corral and certainly not troughs.
Comment period for "Draft Alternatives_508"	N/A	19	Grazing	The BLM should pressure the Department of Justice to resolve the trespass cattle issue in the Gold Butte region. Rogue ranchers, feeling entitled and invincible, continue moving cattle into southern portions of the monument and damaging habitat as they develop cattle watering structures.
Comment period for "Draft Alternatives_508"	N/A	20	Grazing	What worked for BLM to remove the Klump trespass cattle in Arizona should be used to remove the Bundy trespass cattle in Gold Butte.
Comment period for "Draft Purpose and Need_508"	Desert Tortoise Council	21	Grazing	It is our understanding that BLM has concluded that the chronic and harmful Cliven Bundy trespass grazing issue is outside the scope of this IP without providing a rational reason for this decision. We are seriously concerned that this preemptive decision demonstrates BLM's inability or unwillingness to properly protect GBNM objects and values. We quote the following information from a letter to Interior Secretary Haaland from Richard Spotts, dated July 12, 2021: "Although it took several years, the federal government solved a similar chronic trespass grazing situation [as that of Mr. Bundy] in Arizona when it got Mr. Klump put in jail for contempt and placed a lien on his property. But the Department of the Interior (DOI) agencies and the Department of Justice (DOJ) have failed to try these proven solutions with Mr. Bundy."

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Alternatives_508"	Conservation Lands Foundation	21	Grazing	BLM has closed to livestock grazing the public lands within Gold Butte National Monument and adjacent portions of Lake Mead National Recreation Area for over two decades. Yet, unauthorized livestock grazing continues across the Monument, threatening the wildlife habitat, vegetation communities, and other objects of scientific, historic, and prehistoric interest. Indeed, federal courts have held - repeatedly - that on-going trespass grazing is causing irreparable harm to these treasured resources within Gold Butte, and "the public interest is . . . best served by removal of trespass cattle that cause harm to natural and cultural resources or pose a threat to the health and safety of members of the public who use the federal lands for recreation." See <i>United States v. Bundy</i> , Case No. 12-cv-00804 (D. Nev. July 9, 2013), ECF No. 35, at p. 4. Through this same order, the federal court ordered defendant to remove his livestock from Gold Butte, while simultaneously ordering that the United States is "entitled to seize and remove to impound any of [defendant's] cattle." <i>Id.</i> at 5. Yet, unauthorized livestock grazing continues within Gold Butte. It is now long-past time for BLM to exercise its authority under the above-cited court orders, together with their authority under BLM's own grazing regulations, to remove all unauthorized grazing from Gold Butte. See, e.g., 43 C.F.R. § 4140.1(b)(1)(i) (prohibiting unauthorized livestock grazing on public lands); <i>id.</i> at § 4140.1(b) (establishing civil and criminal penalties for unauthorized livestock grazing); <i>id.</i> at §§ 4150.2, 4150.4, 4150.4-1, 4150.4-2 (authorizing BLM to impound and dispose of the unauthorized livestock after written notice of intent to impound; see also <i>Klump v. United States</i> , 38 Fed. Cl. 243 (1997) (government had not violated takings clause in impounding cattle as sanction for unauthorized grazing on federal lands). Based on the severity of the trespass, and the adverse consequences impacting the objects protected through Presidential Proclamation 9559, BLM must immediately begin impoundment and removal of all trespassing livestock within Gold Butte National Monument.
Comment period for "Draft Purpose and Need_508"	N/A	25	Grazing	One of the first issues that must be addressed is the issue of feral livestock. That includes the Bundy family's trespass cattle as well as the hundreds of burros now roaming Gold Butte. I realize that the trespass cattle issue is really in the hands of the Department of Justice, but the plan needs to clearly state that the cattle are in trespass and don't belong within the boundaries of the Monument.
Comment period for "Draft Purpose and Need_508"	N/A	25	Grazing	While the Virgin River itself is mostly outside the Monument Boundary, it is ecologically a key part of Gold Butte. Removing the trespass cattle is essential if the efforts to restore the native riparian vegetation in the rivers' flood plain are to be successful.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Grazing	Law Enforcement. Uphold existing decisions on uses that are and are not allowed in Gold Butte National Monument. Eliminating illegal trespass must be a priority for protecting the resources at Gold Butte.
Comment period for "Draft Purpose and Need_508"	Western Watersheds Project	30	Grazing	Take whatever action is necessary to begin removing Bundy's trespass cattle on the Monument. This letter I by former BLM employee Richard Spotts provides you with ideas on how to proceed safely. I <a href="https://www.counterpunch.org/2021/07/12/an-open-letter-to-interior-secretary-haaland-cliven-bundys-chronic-trespass-grazing-must-end-and-how-to-do-it/">https://www.counterpunch.org/2021/07/12/an-open-letter-to-interior-secretary-haaland-cliven-bundys-chronic-trespass-grazing-must-end-and-how-to-do-it/</a>
Comment period for "Draft Purpose and Need_508"	Western Watersheds Project	30	Grazing	Remove all illegal Bundy water infrastructure and fencing.
Comment period for "Draft Purpose and Need_508"	Western Watersheds Project	30	Grazing	There are still active grazing allotments within Gold Butte National Monument (Mesquite Community and Lime Springs) whose boundaries should be modified so they no longer overlap with the Monument area and all fencing/infrastructure removed. The last AMP for Mesquite Community was in 1983. Arizona Strip FO should prioritize NEPA and develop a new AMP. Livestock grazing has not been permitted in the monument area since 1998 and the Secretary shall not issue any new grazing permits or leases on lands within the monument. Proclamation 9559 Pg. 5
Comment period for "Draft Purpose and Need_508"	Western Watersheds Project	30	Grazing	Until the time Bundy's illegal cattle are removed from the Monument, WWP sees toilets, signage and improved roads as merely a distraction from the real issue. We cannot recover this ecosystem and properly manage Gold Butte until the main cause of ecological destruction has been neutralized. With Bundy's cows still on the loose, we see this process as mostly illegitimate and futile.



Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Purpose and Need_508"	Arizona Strip District Office Bureau of Land Management	31	Grazing	The GBNM proclamation states that no new livestock grazing permits will be issued within the Monument. The ASFO, through agreement with Nevada BLM, administers grazing on two allotments either wholly or in part within the GBNM: Lime Spring Allotment and two pastures of the Mesquite Community Allotments. The GBNM Proclamation failed to recognize that grazing was already occurring in these areas. The potential for amending the Proclamation to correct this error is extremely low. The Lime Spring Allotment encompasses 3,596 acres of federal land and 160 acres of private land. This allotment is entirely within GBNM. The ASFO Resource Management Plan (RMP) (2008) identified the allotment as available for livestock grazing. The allotment is authorized for grazing on a year-by-year basis when monitoring shows there is sufficient forage available. Grazing applications were received each year from 2016 through 2022, and an application is anticipated again in 2023. The allotment is authorized annually for 200 Animal Unit Months (AUMs). The existing term grazing permit expires on February 28, 2030. The Mesquite Community Allotment is a large allotment with 48,071 acres, the majority of which are in Arizona. Approximately 10,000 acres of the allotment are within Nevada. Portions of two separate pastures of the Mesquite Community Allotment (6,515 acres) are within GBNM (see attached map). The ASFO RMP identified the allotment as available for grazing. The allotment is authorized annually for 2,406 AUMs, of which approximately 178 AUMs are within the GBNM. The current term grazing permit will expire on December 12, 2030. The 1998 Las Vegas Field Office RMP identifies these two allotments as available for grazing but administered by the Arizona Strip District. The 2008 Arizona Strip Field Office RMP has similar language, allocating these two allotments as available for grazing. The Arizona Strip Field Office has been renewing existing permits on these two allotments since the mid-1990s. Both grazing permits are valid until they expire in 2030. The Arizona Strip District recommends the following steps be taken to address this issue: 1. Based on advice from Department of the Interior (DOI) Solicitors consulted by both districts, we recommend inclusion of a statement in the Gold Butte Implementation Plan indicating: DOI does not consider existing permits, even when renewed, as "new" permits and therefore are not subject to the Proclamation's prohibition on new grazing. This would apply to "fully processed" permits and transferred permits, so long as the permits themselves were in existence when the Monument was proclaimed.
Comment period for "Draft Purpose and Need_508"	Arizona Strip District Office Bureau of Land Management	31	Grazing	The Arizona Strip District requests further discussion about administrative responsibilities for managing these allotments. We would like to discuss options for returning management of the Lime Spring Allotment to Nevada BLM, since that allotment lies entirely within Nevada. The Arizona Strip District proposes to continue to administer livestock grazing for the Mesquite Community Allotment, including those pastures within GBNM. We remain open to management actions that promote conservation of resources consistent with the Monument Proclamation.
Comment period for "Draft Purpose and Need_508"	N/A	11	Wild horses and burros	And the burro population has increased dramatically in the last couple of years. We're getting huge amounts of environmental damage out there and encourage the BLM to uh enact their existing plans to manage burros and get on with it.
Comment period for "Draft Alternatives_508"	N/A	14	Wild horses and burros	I do have concerns regarding the wild burro population as I have hiked many places which burros are present. It is a treat to meet some but the effect they are having on some of the springs needs to be assessed as well as their true numbers. At a meeting long ago I recall the number being in the 80's where the population is supposed to be. I believe they are well over that. A joint effort with Grand Canyon Parashant to manage the population would be optimal as their range is in both.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	18	Wild horses and burros	Everybody understands that feral livestock is a problem, that's both cattle and burros. Um, but last count, I understood there was more than six hundred burros in Gold Butte and they increase about 20% a year. So, there's probably over 700 by now, and within three or four years you'll have more than 1,000 there. And this is a real problem. The BLM needs to get that number down to as close to zero as possible, and the closer it is to zero that the less probably you'll have in future maintaining that.
Comment period for "Draft Alternatives_508"	N/A	19	Wild horses and burros	Gold Butte is being overrun by feral burros that are creating trails, damaging water sources, and creating erosion throughout the monument. There already is a horse and burro management plan established for the area, and the BLM should act on this plan to better protect the Objects and Values of the monument.
Comment period for "Draft Purpose and Need_508"	N/A	25	Wild horses and burros	The burro population increases at the rate of about 20%/year with a doubling time of four to five years. The numbers need to be reduced dramatically or eliminated in order to protect the native plants and animals and natural water sources.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Wild horses and burros	Burros. Actively manage wild burros to low AML in order to maintain resources that the Monument was designated to protect.
Comment period for "Draft Alternatives_508"	Wasatch Mountain Club	13	Special designations	Sensitive and vital ecological areas within the Monument should be analyzed for special designations that would protect nature, solitude, and other values. There are areas, including Bitter Ridge, that should gain Wilderness status. Other sections of the Monument should be included in Multi-species Habitat Conservation Areas. Other areas, like Little Finland, should receive additional protection to help ensure no damage is done to fragile features.

Comment Period	Organization	Submission Number	Issue Category	Comment Text
Comment period for "Draft Alternatives_508"	Conservation Lands Foundation	21	Special designations	BLM must adhere to management standards and established policies for managing national monuments as units of the National Conservation Lands. Rather than being managed for multiple use, these lands must be managed in order to "conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations.7 7 16 U.S. Code § 7202 - Establishment of the National Landscape Conservation System. <a href="https://www.law.cornell.edu/uscode/text/16/7202">https://www.law.cornell.edu/uscode/text/16/7202</a> As such, all new additions to the System have several basic conservation standards, including: 1) Prescriptive language that requires the area to be managed for the conservation, protection, and enhancement of resources over other uses; 2) A prohibition on discretionary uses that are not consistent with conservation and protection of these resources; 3) A mineral withdrawal; and 4) Restrictions on off-road vehicles and a travel management plan with restrictions necessary to protect the area. These standards ensure that lands within the System are managed consistently for conservation and safeguarded for future generations. Many units in the System have additional protections in place to ensure conservation of unique resources in specific, individual areas. Conservation standards for the System have also been outlined in Department of the Interior guidance and BLM policies. 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."8 In 2011, BLM released the 15-Year Strategic Plan, setting specific goals for how to manage the National Conservation Lands, with a focus on conservation, protection, and restoration.9 In 2012, Policy Manuals were released that interpreted the national policy and set guidance for daily management decisions. 8 Utah NCL Strategy, Appendix F: Secretarial Order No. 3308. <a href="https://sites/blm.gov/files/UtahNCLStrategyFinal.pdf">https://sites/blm.gov/files/UtahNCLStrategyFinal.pdf</a> 9 The National Landscape Conservation System 15-Year Strategy, 2010-2025. <a href="https://www.blm.gov/sites/default/files/documents/files/NLCS%20Strategy_O.pdf">https://www.blm.gov/sites/default/files/documents/files/NLCS%20Strategy_O.pdf</a>
Comment period for "Draft Alternatives_508"	Conservation Lands Foundation	21	Special designations	BLM Policy Manual 6220 establishes conservation standards for National Monuments. In development of Monument Management Plans, Manual 6220 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.10 10 BLM Policy Manual 6220. <a href="https://www.blm.gov/sites/blm.gov/files/mediacenter/blmpolicymanual6220.pdf">https://www.blm.gov/sites/blm.gov/files/mediacenter/blmpolicymanual6220.pdf</a> The full range of alternatives and ultimately the final plan for the Gold Butte National Monument must fulfill and be within the scope of these policies.
Comment period for "Draft Purpose and Need_508"	Western Watersheds Project	30	Special designations	Study and recommend additional lands for inclusion in the Monument boundary.
Comment period for "Draft Alternatives_508"	N/A	19	Lands with wilderness characteristics	There are miles of rusting, old barbed-wire fences in Gold Butte. Some of this fencing might be considered historically important in interpreting the ranching history of the area, but most is out-of-sight and out-of-mind. The BLM should implement plans to remove as much of this old fencing as possible on Lands with Wilderness Characteristics to better protect the Objects and Values of the monument.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Lands with wilderness characteristics	Wilderness Character and Quality. Commit to maintaining the Wilderness character and quality of designated Wilderness areas, Wilderness Study Areas, Instant Study Areas, and other Lands with Wilderness Characteristics within the Gold Butte National Monument. We want all Lands with Wilderness Characteristics to stay in that category and be managed as such.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Lands with wilderness characteristics	Lands with Wilderness Characteristics, as described in the 2018 document by the FoGB and other organizations, should be expanded and maintained to preserve the "look and feel" of Gold Butte, which is the reason we visit the area.
Comment period for "Draft Purpose and Need_508"	Friends of Nevada Wilderness	28	Visual resources and dark skies	Dark Skies. Protect the dark sky resources in Gold Butte, which are particularly unique in the Southern Nevada District. Consider dark sky resources and follow guidelines from the International Dark Sky Association when developing any recreational facilities and evaluating permitted uses in Gold Butte. We've recorded dark sky measurement at Gold Butte that average 21.21 mpsas, meaning that Gold Butte could meet the threshold to qualify as a Dark Sky Reserve (20+ mpsas) and Dark Sky Park (21.2+ mpsas) according to the International Dark Sky Association and we want to see this resource maintained.
Comment period for "Draft Purpose and Need_508"	Friends of Gold Butte	33	Visual resources and dark skies	Dark Sky designation and certification throughout the entire monument.

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# Appendix B

Suggested Literature and Data Provided by Public Commenters

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## Appendix B. Suggested Literature and Data Provided by Public Commenters

Public comment submissions contained various suggested best available science and information for the BLM to consider while preparing the implementation plan and EA. The full citations of these references are provided below.

Aber, J. D., K. J. Nadelhoffer, P. Steudler, and J. M. Melillo. 1989. "Nitrogen saturation in Northern Forest Ecosystems." *BioScience* 39(6):8–386.

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