Shivwits Plateau
Landscape Restoration Project

Environmental Assessment

DOI-BLM-AZ-A030-2021-0005
PEPC 98370

June 2021

United States Department of the Interior
National Park Service
Bureau of Land Management
Grand Canyon-Parashant National Monument
345 East Riverside Drive
St. George, Utah 84790

Appendix M. Public Scoping Comments

Substantive and other public scoping comments are organized by issue in the table. Comments in common to several groups or individuals were combined into one comment, where applicable, and subsequently addressed in one response. Comments received after the comment period closed were not considered during alternative development. All comments were considered in the Monument alternative development process.

Commenter Name	Comment Category	Comment	Response
Spotts Sierra Club WWP	Additional alternatives	Several comments were received regarding providing additional alternatives including the elimination of livestock grazing, and/or fully processed permit renewals, or any other anthropogenic uses, that are the cause of the degraded landscape conditions.	Section 2.3 addresses alternatives considered but not carried forward for analysis.
WWP	Additional Information	It is a little difficult to determine from the project area map …allotments that overlap with the proposed vegetation treatments. We would appreciate any clarification or correction to our assessment.	See Section 3.6 and Appendix B Figure B.5 for allotments within the project area.
WWP	Additional Information	The information about the land health of the allotments that are covered by this proposed action is a necessary part of the baseline for the NEPA process. Without this information, the BLM and NPS cannot have a full understanding of how best to address the causes of the problems this project seeks to address.	See Section 3.6 and Appendices F and G for rangeland health monitoring information.
WWP	Additional Information	It is unclear how much riparian and xeroriparian area is included in the project area. This information should be disclosed in the forthcoming analysis.	No treatments are proposed in riparian areas. No areas have been defined as xeroriparian on the Monument.
AZGFD Sierra Club	Additional Information	[AZGFD] recommends that the EA specify the acreage breakdown of treatments within each ecological biome in the project footprint.	See Section 2.2.1 and Appendix J for acreages of treatment units and biomes.
AZGFD Sierra Club	Additional Information	[F]urther refinement of the stated goals, objectives, and methodologies regarding herbicide application in the EA would assist external partners in assessing potential impacts.	See Chapters 1 and 2, and Section 3.9 regarding herbicide use. Proposed herbicide use is targeted for control of invasive non-native plant species.
Spotts Sierra Club	Biological Soil Crust	Comments were received regarding protection and preservation for BSC	See Section 2.2.1 for Design Features to avoid damage to Biological Soil Crust and Section

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		"These soil crusts are fragile and some proposed treatment methods would destroy them."	3.9 for a discussion of current status and potential impacts to the component organisms.
AZSFWC	Cooperating Agency	AZGFD has requested Cooperating Agency status for this NEPA analysis. We strongly recommend their request be granted to fully leverage their expertise in planning and implementing the project.	See Section 4.3 Cooperating Agencies, BLM Handbook H1790-1-2008 chapter 12 and NPS NEPA Handbook (2015) section 4.13.B for clarification of process. AZGFD is a cooperating agency for this project.
WWP	Drought	Small-diameter ponderosa pine thinning in combination with drought and grazing, both of which are present in the project area, exacerbated cheatgrass spread	See Section 2.2.1 Design Features for clarification.
Sierra Club	External Information Sources	The agencies should utilize all of the tools at their disposal to ensure a true landscape-level analysis and process for the proposed action. This includes use of the REAs and other assessments as well as coordinating with a multitude of stakeholders on a regular basis.	No REAs cover the project area. See Section 2.2.1 Proposed Treatment Locations and Adaptive Management and Monitoring. Stakeholders are engaged through public scoping, public comments, and MOUs.
AZSFWC	Field trips	We recommend that the GCPNM provide opportunities for on-the-ground public engagement during the NEPA planning process and in the future as the project is implemented. We would welcome the opportunity to participate in field trips or similar events.	The Monument is not hosting field trips for this project. The public are welcome to visit the monument, including the project area, on their own schedule. Information for the public was incorporated in the alternative development phase of the EA. See Section 2.2.1 Proposed Treatment Locations and Adaptive Management and Monitoring. If you are interested in visiting Grand Canyon-Parashant National Monument, you can find helpful materials, including maps and directions, at Grand Canyon-Parashant National Monument (U.S. National Park

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			Service) (nps.gov) and Grand Canyon-Parashant | Bureau of Land Management (blm.gov)
WWP	Forage Reserve	[T]he BLM and NPS should not consider the use of the Parashant forage reserve to accommodate any displaced livestock grazing as a result of this project. The RMP for the GCPNM…provides only that the Tuweep forage reserve can be used to defer or rest other allotments during vegetation treatments and the Parashant reserve is not identified for that use.	The EA does not propose to use the Parashant forage reserve but may use the Tuweap forage reserve as per RMP MA-GM-14 and MA-GM-15. Future use of the forage reserve would be analyzed in a separate NEPA document.
WWP Sierra Club	Issues - Impact Analysis	"The BLM and NPS should disclose the impacts to soils, climatic change, rare plants from the proposed action as well as disclosing the cumulative impacts of nearby BLM vegetation management projects and livestock grazing on the soils in the project area." "A partial list of objects to be protected include: a. Cultural resources – The monument proclamation identifies and details an impressive collection of cultural and historic resources as a primary purpose for the Monument. The lack of intensive human access and activity on lands with wilderness characteristics helps to protect these resources. b. Scenic values – The monument proclamation identifies the "engaging scenery" as a resource of the monument. FLPMA specifically identifies "scenic values" as a resource of BLM lands for purposes of inventory and management (43	See Chapter 3 and Table 3.1 to see resources analyzed and Section 1.5 regarding Monument Objects.

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		U.S.C. § 1711(a)), and the unspoiled landscapes of lands with wilderness characteristics generally provide spectacular viewing experiences. The scenic values of these lands will be severely compromised if destructive activities or other visual impairments are permitted. d. Recreation – FLPMA also identifies "outdoor recreation" as a valuable resource to be inventoried and managed by BLM. 43 U.S.C. § 1711(a). Lands with wilderness characteristics provide opportunities for primitive recreation, such as hiking, camping, boating and wildlife viewing. Primitive recreation experiences may be foreclosed or severely impacted if the naturalness and quiet of these lands are not preserved. e. Lands with wilderness characteristics" "Moreover, the analysis must include the confounding effects of climate change."	
Sierra Club	Issues - Special Status Plants	The potential impacts of the various proposed treatments on these [sensitive plant] species and the agencies' proposed mitigation should be clearly delineated and analyzed in any subsequent NEPA document.	See Section 3.9 Special Status Species.
Sierra Club	Issues - Air Quality/ Climate Change	Address the implications of the increase in dust production on climate change and monument values including vegetation, nutrient cycling, soil fertility, water holding capacity, and biological soil crusts	See Section 3.3 Air Quality and Section 3.9.2 Vegetation.
AZSFWC	Issues - Burro	Feral Burro…We request they be included as an issue in the NEPA analysis	See Table 3.1 Wild Horses and Burros.

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Spotts Sierra Club	Monument Object Effects	Several comments were received regarding Monument object impacts. "must analyze how each action alternative may affect one or more of the identified GCPNM "objects" and what specific design features would be required and consistently monitored to ensure that those objects remain protected." "The most important aspect of this project is ensuring that the objects that the monument was designated to protect are conserved, protected and restored over the life of the project and beyond. These objects include "The ecological diversity resulting from the junction of two physiographic ecoregions (the Basin and Range and Colorado Plateau) and three floristic provinces (the Mojave Desert, Great Basin, and Colorado Plateau), including a diversity of wildlife" (RMP ROD at 1-21)."	See Section 1.5 and Section 2.2.1 Design Features. Impacts to Monument objects were analyzed in Chapter 3.
Spotts	NEPA process	Comments were received questioning the potential programmatic status of the EA. "Would this EA be programmatic with planned subsequent site-specific supplemental EAs?" "BLM and NPS should clarify that the Shivwits project NEPA analysis is intended to serve as a programmatic document and that subsequent tiered projects covered by any subsequent NEPA document will undergo their own rigorous NEPA analysis."	This EA would not be programmatic. Neither NPS nor BLM guidance allows for the creation of supplemental EAs. Please note this project has treatment units and analysis of effects includes site-specific considerations. See Figures 2.1-2.3 for treatment unit locations.
WWP Sierra Club	NEPA Process	"The Preliminary Project Summary that accompanied the scoping notice for this project appears to be a preliminary Environmental	The Preliminary Project Summary was provided to the public for the purposes of background information, purpose and need for

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		Analysis rather than a project summary, complete with alternatives and very cursory analysis. This brings us to urge the BLM and NPS to recognize that this project requires the preparation of an Environmental Impact Statement." "BLM and NPS should complete an environmental impact statement (EIS) instead of an EA, given the huge scope of the project"	the project, and preliminary proposed actions, issues and alternatives developed during internal scoping. See BLM Handbook H1790-1-2008 sections 7.1 and 7.2, and NPS NEPA Handbook (2015) section 1.5.E for more information about appropriate information to be shared with the public during public scoping. See Section 2.2.1 for actual acreages for proposed treatment and design features.
Sierra Club	NEPA Process	When considering the effects of past actions as part of a cumulative effects analysis, the Responsible Official must analyze the effects in accordance with relevant guidance issued by the Council on Environmental Quality	See cumulative impacts analysis sections in Chapter 3 for each issue analyzed in depth (Sections 3.3-3.11).
Sierra Club	NEPA Process	The agencies must also analyze the full hierarchy of mitigation options for offsetting the negative effects, with avoidance of impacts being paramount. Avoidance of impact is especially important in the context of the GCPNM, where there are high densities of outstanding biological and cultural resources as recognized by the proclamation establishing the monument.	See Section 2.2.1, including Design Features where avoidance is used as a mitigating measure, for example "When in the vicinity of known cultural resources (i.e. archaeological site(s)), treatment boundaries would be designed to avoid all cultural resources and to avoid making the archaeological site more visually obvious."
WWP	Post treatment - Post seeding	Livestock operators should be required to defer grazing their livestock on the treated areas for a sufficient amount of time to allow the restoration efforts to succeed.	Rest, or deferred grazing, is included as a design feature. See Section 2.2.1.
Sierra Club	Posttreatment - Monitoring	To avoid damaging the treatment by allowing livestock use too early, the agencies should stipulate clear objectives measures for forbs,	See Section 2.2.1 Adaptive Management and Monitoring and Design Features and Appendix D.

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		perennial grass, and biological soil crust cover, as well as indicators of soil erosion such as percent cover of bare ground, that must be met before resumption of grazing.	
Spotts AZSFWC Sierra Club	Post-treatment - Rest	Several commented were received recommending different post-treatment rest durations or suggesting the "2 growing season rest period in the design features was inadequate" "GCPNM should use seeding practices that will maximize potential for success, including one or more years of post-seeding rest from grazing, when treatments occur in active livestock allotments."	Note that while two years is listed as the length of time to exclude livestock from treatment areas in the design features (Section 2.2.1), this timeframe could be longer or shorter based upon vegetative (and other) monitoring, with the overall goal to ensure the success of treatments.
Sierra Club	Roads	No new or temporary roads should be constructed as part of this project.	No new or temporary roads are proposed in this project.
Sierra Club	Treatment - Adaptive Management	Specify what monitoring will be used to determine effectiveness and what will be done if treatments are determined to be ineffective.	Section 2.2.1 Adaptive Management and Monitoring addresses types and protocols of monitoring used to determine the efficacy of the proposed action.
Sierra Club	Treatment - Design	Protect old growth stands of ponderosa and pinyon-juniper forest. No old trees should be cut. Recognize that old trees are not "encroachment" and young trees within old growth stands are a normal part of succession and can usually be treated with fire if they are perceived as being overly dense.	See Section 2.2.1 Treatment Unit Specific Planning and Appendix A DFC-VM-28 and DFC-VM-29.
AZGFD	Treatment - Design Features	Department recommends a breakdown of the treatment of slash vs. mastication debris. As currently written, the statement suggests 24" of post mastication "mulch" could be left on the landscape.	See Section 2.2.1 Design Features for clarification.

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AZGFD	Treatment - Fire	There are significant risks associated with burning P-J ecosystems in northern Arizona. They include ecotype conversion under climate change, conversion to invasive species (i.e., cheatgrass), and soil and seed bank loss. Current literature, and the Department's experience over the last 3 decades, has documented a high risk of cheatgrass expansion in P-J habitats that have experienced intense wildfire.	See Section 2.2.1 Design Features and Adaptive Management and Monitoring sections.
AZGFD Sierra Club	Treatment - Fire	"Department recommends that prescribed fire not be applied at a large scale within the P-J type. The Department believes that prescribed fire could be appropriate on a trial basis at a small scale in strategic locations (i.e. where cheatgrass expansion is unlikely, under conditions that favor a cooler fire), and recommends development of monitoring protocols conducted before and after implementation to assess effectiveness" "Recognize that ponderosa pine, pinyon-juniper, and sagebrush fire regimes are very different. Maintenance of ponderosa pine communities requires frequent low intensity fires, but pinyon-juniper and sagebrush have longer fire return intervals. Fire is not a driver of those ecosystems. These communities should have different prescribed fire regimes, and BLM and NPS should provide more detail about how they will tailor management to each community type."	See Section 2.2.1 Design Features and Adaptive Management and Monitoring sections.
Sierra Club	Treatment - Fire	Mechanical treatments are not proposed for ponderosa pine (Project Summary at 3) but the	See Section 2.2.1 Proposed Action for clarification.

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		Project Summary goes on to say, "Prescribed fire typically would follow a mechanical or manual treatment to prepare the site for favorable treatment outcomes or may take place with limited pre-treatment site preparation." (Project Summary at 5) This is confusing and should be clarified.	
AZSFWC	Treatment - Fire	Application of Fire… this must be done in a manner that does not facilitate further spread and dominance by cheatgrass and other invasive weeds and protects fire-sensitive plant communities like blackbrush that have been severely impacted by wildfires across the Arizona Strip.	See Section 2.2.1 Treatment Unit Specific Planning and Design Features. No treatment in blackbrush communities is proposed.
AZSFWC	Treatment - Fire	We also recommend that managed wildfire (natural or anthropogenic ignitions) should be included in the toolbox along with prescribed fire.	Managed wildfire is presently allowed in the project area as per the RMP (2008) LA-FM-03: "Appropriate Management Response (AMRs) for managing wildland fires will be used by the BLM and NPS (as identified in the BLM Fire Amendment and the BLM and NPS Fire Management Plans). The AMR is based on firefighter and public safety and objectives and constraints derived from the fire management allocations (Wildland Fire Use, Non Wildland Fire Use), relative risk to natural and cultural resources, DFCs, fire management unit objectives, potential complexity, the ability to defend management boundaries, and costs of protection. AMRs will be used in areas classified as Wildland Fire Use and Non Wildland Fire Use."

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AZSFWC AZGFD	Treatment - Herbicide	Any application of herbicide within the project area should avoid areas of high value forage for wildlife, such as cliffrose and fourwing saltbush.	See Section 2.2.1 Chemical Treatments. Cliffrose and fourwing saltbush are not proposed to be treated by any herbicide.
WWP Sierra Club	Treatment - Invasive, non-native plants	Vegetation projects targeting sagebrush or pinyon-juniper woodlands, as this project proposed, risk becoming vectors for cheatgrass invasion. Do not use Tebuthiuron to treat sage in the project area.	Cheatgrass is known issue. See Section 2.2.1 Design Features, Treatment Unit Specific Planning and Adaptive Management subsections planning to minimize cheatgrass expansion. Herbicide use is targeted to non-native invasive plant species, including cheatgrass, to minimize impacts on the landscape. Tebuthiuron is not proposed to be used in this project.
AZGFD	Treatment - Mosaic	Treatment patches would be placed to avoid adverse impacts to soils and cultural resource sites, maximize desired vegetation response while retaining old growth P-J attributes, and limit long site distances within a treatment block. Such an approach would increase habitat heterogeneity, allow reasonably efficient implementation, and provide added protection for cultural resources.	See Section 2.1 Treatment Unit Specific Planning and Appendix C Figure C.8.
AZSFWC Sierra Club	Treatment - Pinyon Jay	We encourage GCPNM to adopt current recommendations developed by the Pinyon Jay Working Group facilitated by the U.S. Fish and Wildlife Service.	See Section 3.11.2 Wildlife for a discussion of potential impacts to pinyon jay and Section 2.2.1 Design Features regarding pinyon jay.
Sierra Club	Treatment – Pinyon-Juniper	BLM and NPS should make every attempt to retain all pinyon pines, in order to allow the population to recover after recent regional mortality events.	See Section 2.2.1 Treatment Unit Specific Planning that addresses pinyon pine retention.
Sierra Club	Treatment – Pinyon-Juniper	The expansion of pinyon and juniper may well be a natural process that is expensive and ultimately futile to arrest. In keeping with the Proclamation's	This project determined pinyon and juniper expansion based on ESDs, the best known approximation we have for the area of

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		requirement to protect biological values, the monument should assess the presettlement range for these forests and promote recovery where deforestation had occurred and adjust the project accordingly.	"presettlement" vegetation. See Section 2.2.1 Treatment Unit Specific Planning for areas where expansion would be encouraged in the proposed action.
AZSFWC	Treatment – Pinyon-Juniper	It is important to distinguish among persistent woodlands versus those that represent encroached grasslands or areas of woodland expansion/contraction. Old-growth persistent woodlands have unique wildlife habitat value that should be fully conserved as much as possible. Treatments within the pinyon-juniper type should avoid the historical practice of large scale mechanical clearing and seeding with non-native species. These treatments are controversial, have dubious benefits to wildlife, are inconsistent with the Purpose and Need for the project, and opposed by our organization. To maximize benefits to game and nongame species, mechanical treatments should be strategically applied in a manner that mimics small-patch natural disturbances -- creating openings that allow developed understory layers. A potential strategy would be to delineate blocks <640 acres in size, within which up to 25% of the area would receive dispersed, irregularly shaped treatment patches <5 acres in size. This would increase habitat heterogeneity, allow efficient implementation, and provide added protection for cultural resources.	Woodlands on the Monument are not characterized formally as persistent, encroaching or expansion/contraction. However, using a combination of known vegetation types and ESDs, the category "pinyon-juniper woodland" is roughly equivalent to persistent woodlands, "sagebrush shrubland", "sagebrush grassland" and "grassland-native or introduced" are roughly equivalent to encroaching and "pinyon-juniper savanna" is roughly equivalent to expansion/contraction. See Section 2.2.1 Treatment Unit Specific Planning and Appendix C Figure C.8 for a variation of your proposal.

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AZSFWC Sierra Club AZGFD	Treatment - Seed Mix	Several comments received on using native seed. "recommend using locally-adapted seed of native species. Use of non-natives should be limited to situations where ecological objectives in the Purpose and Need cannot be met using available native seed."	See Section 2.2.1 Design Features.
AZGFD	Treatment - Specific Unit Treatment Design	Department recommends some guiding concepts for consideration when planning and implementing habitat enhancement prescriptions within Ponderosa Pine ecosystems.	See Section 2.2.1 Treatment Unit Specific Planning. Each unit would have an individual implementation plan. Guidelines would be incorporated in the plan. As a cooperating agency, the AZGFD are collaborating with the Monument staff during planning and future implementation.
AZGFD Sierra Club	Treatment-Mechanical	Mechanical treatments are also appropriate where pinyon and juniper have encroached into sagebrush stands or are moving down slope into shrub-grassland, savannah, and grassland areas. In these areas, the goal should be to thin/remove encroaching trees but retain pockets of persistent woodland that are often interspersed on shallower/rocky soils.	See Section 2.1 Treatment Unit Specific Planning
WWP Sierra Club	Tribal Consultation	The scoping notice and summary indicate that some effort to reach out to Tribal governments was attempted, but this effort should be fully described.	See Section 4.4 Tribal Consultation
Sierra Club	Wilderness	Also, policy requires that "all management decisions affecting wilderness will further apply the concept of 'minimum requirement' for the administration of the area regardless of wilderness category," (NPS 2006: Chapter 6.3.1), and that management conduct an adequate	See Appendix H for Minimum Tools Analysis documentation and Section 3. 7 Proposed Wilderness (NPS managed lands).

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		minimum requirement analysis that is made available to the public in a timely fashion.	
Sierra Club	Wildlife	According to the monument RMP, "Self-sustaining populations of Kaibab squirrels will be enhanced or maintained within the Trumbull-Logan WHA	This project is outside the Trumbull-Logan WHA. Kaibab squirrels are not known to occur in the project area.
Sierra Club	Wildlife	The project area includes habitat of threatened MSO. Any management affecting owl habitat requires consultation with the U.S. Fish and Wildlife Service ("FWS") to secure an exemption of the proposed action from the ESA Section 9 prohibition on take of listed species.	See Table 3.1. In Northern Arizona (including on the Arizona Strip), the Mexican spotted owl is distributed within a fragmented rocky canyon environment where steep cliffs generate microclimates and habitat structures that allow the owl to establish nest sites and locate protected roost sites (from Willey 2011). There is no suitable MSO habitat in the project area – there is no cliff habitat within the project area, and ponderosa pine communities in the project area have been evaluated by BLM Arizona Strip biologists and determined to be unsuitable. Consultation with the U.S. Fish and Wildlife Service is therefore not needed for this project.
AZSFWC	Wildlife Corridor	Wildlife Corridors…. We ask the Monument to work with the AZGFD to identify these corridors and prioritize them for treatment where needed.	Wildlife corridors have been identified for the BLM Arizona Strip District, including the entire Monument, in conjunction with AZGFD. No corridors were identified in the project area.