

Black Canyon of the Gunnison National Park and
Curecanti National Recreation Area
Colorado

National Park Service
U.S. Department of the Interior



PUBLIC SCOPING COMMENT SUMMARY REPORT

Black Canyon of the Gunnison National Park and
Curecanti National Recreation Area
Grazing Management Plan

December 2024



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ACRONYMS AND ABBREVIATIONS

Full Phrase

BLM	Bureau of Land Management
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EA	Environmental Assessment
EIS	Environmental Impact Statement
NEPA	National Environmental Policy Act
NPS	National Park Service
PEPC	Planning, Environment, and Public Comment
U.S.C	United States Code
USFWS	United States Fish and Wildlife Service
USFS	United States Forest Service

Chapter 1. Introduction and Guide

The United States Department of the Interior, National Park Service (NPS) is proposing to develop a grazing management plan for Black Canyon of the Gunnison National Park and Curecanti National Recreation Area (the park units). This report documents the results of the scoping period in support of the National Environmental Policy Act (NEPA) document. Public scoping initiates the NEPA process and the identification of issues to address in the NEPA document, in this case an environmental assessment (EA). All stages of public involvement are a vital part of the NEPA process. Future public involvement will include a public review of the EA and collaboration with federal, state, and local governments and interested Tribes.

1.1 SCOPING PERIOD PROCESS SUMMARY

On August 19, 2024, the NPS published a scoping newsletter and initiated the start of a 31-day public comment period which concluded on September 20, 2024. The newsletter included a description of the project background, the project's purpose and goals, and preliminary alternatives. On August 27th, 2024, the NPS held a virtual scoping meeting to present information on the proposed project and answer questions posed by the public. The NPS held two in-person meetings in Gunnison and Montrose, CO, on August 28th and August 29th, respectively. The Gunnison, CO meeting had a total of 4 public attendees and the Montrose, CO meeting had a total of 7 public attendees. During the meetings, the NPS gave a brief presentation, which can be found on the parks PEPC page¹. After the presentation, the NPS opened the meetings to a question and answer session. The NPS invited members of the public to submit comments on the project via handwritten submissions submitted at the meetings, by US mail, or electronically through the NPS Planning, Environment, and Public Comment (PEPC) website.

1.2 NATURE OF COMMENTS RECEIVED

The NPS received 14 pieces of correspondence during the scoping comment period. The majority of comments related to the management of livestock within the park units, while fewer comments related to the management of other resources.

1.3 THE COMMENT ANALYSIS PROCESS

Comment analysis is a process used to compile and combine similar public comments into a format that can be used by decision-makers and the NEPA team. The comment analysis assists the team in organizing,

¹ <https://parkplanning.nps.gov/blcacuregrazing>

clarifying, and addressing technical information regarding the grazing management plan. It also aids in identifying the topics and issues to be evaluated and considered in the EA.

The comment analysis process includes five main components:

- Developing a coding structure
- Employing a comment database for comment management
- Reading and coding public comments
- Interpreting and analyzing the comments to identify issues and themes
- Preparing a scoping comment report summary

The NPS developed a coding structure to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS review, past planning documents, and the comments themselves. The structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS used its PEPC database to manage the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondence and comments received, sorting and reporting of comments by a particular topic or issue, and demographic information regarding the sources of the comments.

The analysis of the public comments involved assigning codes to statements made by the public in their submitted letters. The NPS read and analyzed all comments, including those of a technical nature; those expressing opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report is just one part of the process of gathering internal and external input. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. Furthermore, this was not a vote-counting process, and the emphasis was on the comment's content rather than the number of times a comment was received. This report is intended to be a summary of the comments received rather than a statistical analysis.

1.4 DEFINITION OF TERMS

Primary terms used in this document are defined below.

Correspondence: A correspondence is the entire document received from a commenter. It can be in the form of a letter or fax, written comment form, or a comment submitted online using the NPS PEPC website. Each piece of correspondence is assigned a unique identification number in the PEPC system.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject. It could include an expression of support or opposition to the use of a potential management tool with rationale, or additional data regarding an existing condition.

Code: A code is the grouping centered on a common subject. The NPS developed the codes during the scoping process and uses the codes to track major subjects throughout the EA process.

Concern: A concern is a written summary of all comments received under a particular code. Some codes were further separated into several concern statements to provide a better focus on the content of the comments.

1.5 METHODOLOGY

During the public scoping process, 14 unique correspondence pieces were received from the PEPC website directly, or they were entered into the PEPC database for analysis. The NPS read each correspondence and identified specific comments within each correspondence. A total of 114 comments were derived from the correspondences received. Only comments that were received as part of the official comment period from August 19, 2024, to September 20, 2024, were included as part of this analysis.

The NPS gave each comment a code to identify the comment's general content and to group similar comments together. Twenty codes were used to categorize the comments received. An example of a code developed for this project is *Preliminary Alternative A: No Action*. This code relates to any comments received regarding the no-action alternative. In some cases, the same comment may have overlapping issues within the same statement; in this case, a single comment may be categorized under more than one code, reflecting the fact that the comment may contain more than one issue or idea. All comments were read and considered, and relevant comments will be used to help refine the proposed alternatives, which will ultimately be analyzed in the EA.

Under each code, the NPS grouped comments by similar themes, and those groups were summarized with a concern statement. For example, the concern statement, "Removing livestock is needed to protect natural resources in the park units." captured several comments. Following each concern statement are one or more representative quotes, which are comments taken from the correspondences to illustrate the issue, concern, or idea expressed by the comments grouped under that concern statement.

1.6 GUIDE TO THIS DOCUMENT

This remainder of this report is organized as follows:

Chapter 2, Content Analysis Report: This is the basic report produced from the PEPC database that provides information on the numbers and types of comments received, organized by code. The report's first section provides a summary of the number of comments that were coded under each topic. The second section provides general demographic information, such as the states where commenters live, and the number of letters received from different categories of organizations.

Chapter 3, Scoping Period Comment Summary: This report summarizes the substantive comments received during the scoping process. These comments are organized by codes and further organized into concern statements. Below each concern statement are representative quotes, which have been taken directly from the text of the public's comments; they have not been edited. Spelling and grammar errors were not corrected. Representative quotes further clarify the concern statements.

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Chapter 2. Correspondence Summary

The following tables show the distribution of correspondences by how they were coded.

Table 2-1
Comment Distribution by Code

Code Description	Number of Comments ¹
Preliminary Alternative A: No Action Alternative	1
Preliminary Alternative B: Action Alternative	13
Range of Alternatives (New Alternative)	7
Purpose and Need: Planning Process and Policy	9
Purpose and Need: NEPA and Council on Environmental Quality (CEQ)	7
Purpose and Need: Interpretation of Park Policies, Regulations, and Laws	15
Issues: Bighorn Sheep	3
Issues: Cultural Resources	1
Issues: Gunnison Sage Grouse	10
Issues: Livestock, Cattle	12
Issues: Park Management Issues	7
Issues: Socioeconomics	3
Issues: Soils	2
Issues Vegetation	6
Issues: Visitor Use and Experience	4
Issues: Water Resources	2
Issues: Wilderness	4
Issues: Wildland Fire and Fuels	1
Issues: Wildlife	3
General Comment: References	4
Total	114

¹ Note: Each correspondence may have multiple substantive comments. As a result, the total number of correspondences may be different from the actual comment totals.

Table 2-2
Correspondence by Organization Type

Organization Type ¹	Number of Correspondences
Local government	2
Nongovernmental	1
Nonprofit organization	2
Unaffiliated individual	9
Total	14

¹Local and Nongovernmental organizations are listed in **Table 2-3**.

Table 2-3
Organizations Represented in Correspondences

Organization Name	Organization Type
Delta County Commissioners	Local Government
LeValley Ranch	Nongovernmental
Montrose County Natural Resources	Local Government
Sage Steppe Wild	Nonprofit Organization
Western Watersheds	Nonprofit Organization

Table 2-4
Correspondence Distribution by Correspondence Type

Correspondence Type	Number of Correspondences
Web form*	12
Letter	2
Total	14

*Filled out form on the PEPC database

Chapter 3.

Scoping Period Comment Summary

3.1 ISSUES: BIGHORN SHEEP

CONCERN STATEMENT 1: *Emphasis should be placed on bighorn sheep management as a part of this grazing management plan to address threats posed by domestic sheep.*

Organization: *Western Watersheds Project*, **Organization Type:** *Nonprofit organization*

Representative Quote: “We are concerned about areas of potential overlap between bighorn sheep occupied habitat and billed BLM domestic sheep/goat grazing in the Sapinero Mesa, Big Willow, Rawhide/Coffee Pot, and Green Mountain allotments, or any other areas with domestic sheep grazing or trailing. Because of the animal behavior of bighorn sheep, including long-distance foraging behavior, it is likely that allotments beyond the modeled bighorn sheep habitat also have the potential for contact between domestic sheep and bighorn sheep. We request that this Grazing Plan analysis includes a complete risk of contact modeling assessment using up-to-date core habitat and foray data from Colorado Parks and Wildlife to substantively address the threat that permitted domestic sheep pose to native bighorn sheep.”

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “The sage grouse, bighorn sheep, wilderness, and recreation, and all the other natural and cultural resources, should be the top priority to protect, not cows.”

3.2 ISSUES: CULTURAL RESOURCE ISSUES

CONCERN STATEMENT 1: *The NPS should reduce impacts from grazing on natural, historic, and cultural resources*

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “The NPS needs to reduce grazing impacts on natural and cultural resources by all means and methods.”

3.3 ISSUES: GUNNISON SAGE GROUSE

CONCERN STATEMENT 1: *Commenters are concerned that the potential solutions to reduce conflicts among Gunnison sage-grouse and livestock, such as fences, will have detrimental impacts on Gunnison sage-grouse.*

Organization: *Western Watersheds Project, Organization Type: Nonprofit organization*

Representative Quote: “Furthermore, the analysis must analyze how proposed alternatives to address conflict would impact GuSG, especially given that potential solutions could include development of linear features, such as fences, that have a known and deleterious impact on the imperiled GuSG.”

CONCERN STATEMENT 2: *The plan should include seasonal closures to protect Gunnison sage-grouse, particularly during late brood-rearing.*

Organization: *Western Watersheds Project, Organization Type: Nonprofit Organization*

Representative Quote: “We are concerned about the GuSG habitat overlap on the Green Mountain, Grizzly Gulch, Dead Horse Common, Spring Gulch, North Cimarron, Soap Creek, Stevens Creek Commons, Steuben Creek, McIntosh Mountain, Iola, Sapinero Mesa, Big Willow, Pine Mesa, Windy point, Blue Creek, Round Corral Spring, Round Corral Creek, and Rawhide-Coffee Pot allotments. Particularly, the Grizzly Gulch and Green Mountain allotments overlap a dense area of active leks for the Crawford GuSG population. Similarly, Stevens Creek Commons, Steuben Creek, McIntosh Mountain, Iola, Sapinero Mesa, Pine Mesa, and Rawhide-Coffee Pot overlap crucial lek buffers for the West Gunnison GuSG population. This overlap makes seasonal closure an absolute minimum requirement for these allotments, and greater consideration should be given to closing them completely. Allotments with unoccupied habitat overlap, including Dead Horse Common, Spring Gulch, North Cimarron, Soap Creek, Big Willow, Blue Creek, Round Corral Spring, and Round Corral Creek, must also be protected from livestock grazing disturbance and habitat impacts to encourage repopulation and true species recovery.”

Organization: *Western Watersheds Project, Organization Type: Nonprofit Organization*

Representative Quote: “Growing body of evidence suggests that seasonal closures during GuSG lekking, nesting, and early brood-rearing may not be sufficient to protect populations. Davis et al. (2016) found that GuSG juvenile survival was lowest in the late brood-rearing stage during the late summer (June - October). During this period, sage-grouse are often found in meadows (Peterson 1970, Drut et al. 1994) and riparian areas (Crawford et al. 2004, Dinkins et al. 2014) adjacent to sagebrush (Peterson 1970), particularly in areas with good grass and forb cover (Herman-Brunson 2007, Kirol et al. 2012). Unfortunately, livestock also congregate and disproportionately impact these crucial riparian areas and meadows during this time period. Because the proposed seasonal grazing restrictions only apply during the lekking, nesting, and early brood-rearing periods, they do not address this crucial period for juvenile survival.”

CONCERN STATEMENT 3: *The NPS should use the best available science to analyze and determine if livestock grazing can be compatible with Gunnison sage-grouse populations.*

Organization: *LeValley Ranch, Organization Type: Private/Nongovernmental*

Representative Quote: “Moderate livestock grazing (e.g., grazing that balances the intensity, frequency, duration, and timing of grazing with variable vegetation/ forage resources) that supports the persistence of perennial bunchgrasses, has been shown to be compatible with sage-grouse population metrics (Boyd et al., 2014; Dettenmaier, 2018; Doherty et al., 2021; Smith et al., 2020, 2018a, 2018b).”

Organization: *Western Watersheds Project, Organization Type: Nonprofit Organization*

Representative Quote: “Because of the NPS's clear responsibility to prioritize preservation and conservation, the plan should consider whether livestock grazing can truly be compatible with conserving Gunnison sage-grouse (GuSG) and their habitat. We appreciate the acknowledgement that GuSG can be impacted by poorly managed livestock grazing through alterations of the composition and productivity of plant communities. To comply with the policy direction for park units, the grazing management plan should exceed what is prescribed by the BLM or Forest Service for GuSG protection.”

Organization: *Western Watersheds Project, Organization Type: Nonprofit Organization*

Representative Quote: “We recommend that the NPS independently refer to the best available science about the impacts of livestock grazing on GuSG. A forage utilization limit of 35% is the maximum allowable per best available scientific information (Boyd et al. 2014, Galt et al. 2000). The NPS should apply this 35% forage utilization standard as an absolute maximum across all GuSG habitats, not just to riparian areas if grazing is retained in GuSG habitats. Additionally, best available science establishes that at least 7 inches of residual stubble height needs to be provided in nesting and brood-rearing habitats throughout their season of use”

CONCERN STATEMENT 4: *Gunnison sage-grouse management efforts should prioritize promoting broad ecosystem resilience to large-scale threats such as wildfires and invasive species, rather than focusing on fine-scale vegetation metrics.*

Organization: *LeValley Ranch, Organization Type: Private/Nongovernmental*

Representative Quote: “Sage-grouse have been found to be generalists, exhibiting great flexibility when selecting habitat at the fine scale. This fine-scale vegetation, such as bunchgrass cover or shrub structure, does not influence nest success consistently and has weak effects on nest site selection according to a range-wide meta-analysis (Smith et al., 2020). Optimum sage-grouse habitat consists large tracts of land encompassing diverse seasonal habitats (Knick and Connelly, 2011), including healthy tracts of sagebrush that include an herbaceous understory composed of large perennial grasses, perennial forbs, and insect food resources during the nesting season (Boyd et al., 2014; Crawford et al., 2004). Thus, management objectives for sage-grouse and grazing should focus on promoting vegetation conditions that promote resiliency to ecosystem-scale threats such as wildfire and resistance to exotic annual grasses rather than fine-scale vegetation metrics. Not only is

livestock grazing the primary land-use in sage-grouse habitat, but it can also be employed strategically to improve or maintain rangeland condition by addressing these range-wide threats. LeValley Ranch manages livestock with the long-term trend in mind. These management practices are best outlined in Shawver et.al., Climate Change Resiliency in Colorado: Grazing System Best Management Practices, 2020.”

3.4 ISSUES: LIVESTOCK, CATTLE

CONCERN STATEMENT 1: The NPS should plan for, mitigate, and prevent unauthorized (trespass) livestock grazing that causes significant degradation to Park resources and values.

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit organization*

Representative Quote: “Since the units were created there has been significant problems with trespass livestock, with resultant significant degradation to Park resources and values The NPS's approach to dealing with this constant and repeated trespass has been woefully inadequate and ineffective. The [Environmental Impact Statement] EIS needs to address this failure and implement clear and punitive actions to avoid promoting and rewarding trespass as is the case now. In such cases the NPS needs to implement actions under DO - 14 and its handbook as part of all action alternatives”

CONCERN STATEMENT 2: The NPS should eliminate livestock grazing where cheatgrass is found.

Organization: *Western Watersheds Project*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “The CURE/BLCA Grazing Management Plan assessment must appropriately address the role that livestock play in the infiltration and proliferation of cheatgrass, and to apply best management practices to reduce livestock's facilitation of the spread of invasive species in GuSG habitat. We strongly recommend the NPS eliminate livestock grazing wherever cheatgrass is found, not only within GuSG habitat. We also note that the NPS must consult with the U.S. Fish and Wildlife Service pursuant to Section 7 of the Endangered Species Act on this proposal and its effects on this imperiled endemic species.”

CONCERN STATEMENT 3: Livestock grazing in BLCA and CURE should be continued in perpetuity as it is a management tool that can help control vegetation, reduce wildfire risk, and improve the landscape and local economies.

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “Livestock grazing in CURE and BLCA should be continued forever as it can be a useful management tool that can benefit the landscape, the wildlife and local economies. It is beneficial in fire suppression and to generate regrowth that deer and elk thrive on.”

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “Livestock grazing in the BLCA and the CURE need to be permanent in the grazing management plan. Permittees need the ability to use equipment (chainsaw, backhoe, trackhoe, etc.) for water development and maintenance along with fence and trail maintenance. Trailing livestock through the BLCA and CURE should be permanently available as needed also.”

3.5 ISSUES: PARK MANAGEMENT ISSUES

CONCERN STATEMENT 1: The NPS must address permittee compliance, including monitoring and enforcement of terms related to utilization, rotation, and maintenance, as non-compliance undermines both the permit system and the NEPA process.

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “Permittee failure to comply with permit terms and conditions and other requirements shows two things, firstly that the permittee has failed to implement even the minimal standards that are currently in place and secondly, it shows that the NPS has failed to take decisive permit action to ensure compliance.”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “Manual 75 provides direction for the development and implementation of monitoring and assessment. A full monitoring plan must be developed and included in the DEIS. Implementation of it must be fully funded and mandatory.”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “Managers will be held accountable for identifying and accomplishing measurable long-term goals and annual goals that are incremental steps to carrying out the park mission...While this requirement was not implemented in the GMP, it must be implemented in this EIS and ROD.”

CONCERN STATEMENT 2: The current management of grazing and grazing related actions is not adequate and is leading to impacts to park resources.

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit organization*

Representative Quote: “The current GMP does not contain the actions required for the preservation of park resources from the impacts of livestock grazing and trailing. The GMP needs to be amended to provide specific and enforceable requirements and limitation to deal with the wide range of impacts from these non-native, private livestock within the park.”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit organization*

Representative Quote: “Another critical component is an examination of the effectiveness of the current permits and related actions. A classic example of this is fences and water developments. Often, new fences and water developments are proposed to solve riparian issues in spite of the fact that these have been used for many decades without correcting riparian issues. Doing more of the same does not lead to good results is not an effective strategy for public lands management.”

3.6 ISSUES: SOCIOECONOMIC

CONCERN STATEMENT 1: Livestock production is a significant economic development contributor in Delta County and should continue to be authorized.

Organization: *Delta County Commissioners*, **Organization Type:** *Local Government*

Representative Quote: “Livestock production in Delta County contributes \$47,000,000 in direct sales on an annual basis and the ability to graze our public lands provides for that economic contribution from agriculture.”

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “Livestock grazing in both parks should be continued in perpetuity as it can be a useful management tool that can benefit the landscape, the wildlife and local economies. It is beneficial in fire suppression and to generate regrowth that deer and elk thrive on.”

3.7 ISSUES: VEGETATION

CONCERN STATEMENT 1: Livestock grazing impacts (both positive and negative) on short and long-term vegetation trends, ecosystem resilience, and habitats should be analyzed.

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “Livestock grazing causes many serious adverse resource impacts including on special status species, biological soil crusts, pollinators, and riparian habitats. This grazing also is the primary cause for the spread of cheatgrass and other harmful invasive plants.”

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “Also, when season of use is adjusted for the breeding season of the GUSG (or any other species), remember to take into account that grazing in that time period may be the best management for unwanted grasses such as cheat grass and that livestock have likely grazed in that timeframe since the early 1900's or before without harming GUSG populations.”

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “The grazing actually helps to manage the park by reducing the growth of the fields to a manageable level.”

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “Grazing timing, intensity, and duration may have more to do with impacts to habitat than utilization levels. Timing, intensity, and duration are accomplished with grazing rotations and are measured with long term monitoring.”

Organization: *LeValley Ranch*, **Organization Type:** *Private/Nongovernmental*

Representative Quote: “In summary, we target for moderate utilization on an annual basis, rotate the season of use and manage the time and timing of distribution. In addition, the perennial grasses and the height of each of the grasses has increased in number of species and vigor as compared to the 1980's and 90's. This has been done as conditions have become drier and wildlife use has changed. The decrease in Gunnison Sage grouse numbers is similar across the entire landscape and not just specific to the Crawford area.”

CONCERN STATEMENT 2: The EA must use best available science to determine forage availability, utilization limits, and impacts to biological soil crusts (BSC).

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “Foundational to any consideration of grazing permits is the actual amount of forage available to livestock. The NPS must analyze, in a site-specific way, the capability of these allotments to provide forage for livestock. This analysis needs to assess the need for vegetative and BSC recovery, the availability of forage, the distances to water, and slopes not to exceed a certain limit depending on soil types. Forage produced on highly erosive soils must be removed from consideration.”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “Utilization limits (harvest coefficient) that meets all the requirements discussed in the section regarding NPS Policy as well as the physiological needs of the vegetation, while allowing for BSC to recover and fully play its ecological role, must also be factored in.”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “In addition, the NPS further subtract from the available forage, the forage and cover needs of wildlife. As stated above, the NPS must provide for compliance with 4.4.1:

The Service will successfully maintain native plants and animals by preserving and restoring the natural abundances, diversities, dynamics, distributions, habitats, and behaviors of native plant and animal populations and the communities and ecosystems in which they occur; for all plant and animal species, not just the hunted variety. So forage and cover for voles and other small mammals as well as insects and reptiles must also be provided for.”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “Given the foundational nature of BSC, we request that you set up a project with Matt Bowker who did extensive BSC research and modeling work in the adjacent Grand Staircase Escalante National Monument to conduct a similar process on CARE so that not only can you determine departure from the reference state, but can also set measurable objectives and requirements in the permits. For instance, if crust coverage in the reference state is 70% and current coverage is 2%, then permit requirements need to include such actions as major reductions in livestock numbers and time until recovery occurs. While all grazing is destructive to BSC, certain conditions are somewhat less destructive, so requirements need to also be put in place to put any grazing to that time period.”

Organization: *LeValley Ranch*, **Organization Type:** *Private/Nongovernmental*

Representative Quote: “We urge NPS to avoid arbitrary decision-making and require decision regarding management and numbers of livestock to be based on quantitative data that considers long-term vegetation trend. Additionally, quantitative data should be used when determining carrying capacity. “

3.8 ISSUES: VISITOR USE OR EXPERIENCES ISSUES

CONCERN STATEMENT 1: The analysis should recognize that livestock grazing can have a substantial impact on visitor use and experience.

Organization: *Western Watersheds Project*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “The scoping notice recognizes that conflicts between recreationists and livestock can impact grazing operations, but the analysis of grazing on these units should recognize the priorities of park purposes and acknowledge also that livestock grazing can have a substantial impact on visitor experience. The Grazing Management plan must reconcile these impacts with the purposes and the values of the BLCA and CURE.”

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “Livestock grazing is damaging and destructive to wildlife, water, soil, vegetation, and the visitor experience in National Parks.”

3.9 ISSUES: WATER RESOURCES

CONCERN STATEMENT 1: Livestock accessible surface waters in BLCA and CURE are degraded and restoring water quality should be a focus of the EA.

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “Many of the livestock accessible surface waters within BLCA and CURE are in a degraded condition based on the NPS's own data, yet no monitoring of water quality or avoidance of pollution has been done by the NPS. The NPS has not taken "all necessary actions to maintain and restore" water quality and the scoping notice does not propose them.”

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “Livestock grazing is damaging and destructive to wildlife, water, soil, vegetation, and the visitor experience in National Parks. Federally subsidized grazing of privately owned non-native species, such as cows, should be eliminated from all NPS-managed lands.”

3.10 ISSUES: WILDERNESS

CONCERN STATEMENT 1: The NEPA analysis should document how virtual fencing is consistent with Wilderness restrictions and should include a minimum requirements analysis (MRA) and adhere to DO-41.

Organization: *Western Watersheds Project*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “We appreciate the NPS's acknowledgement of how the presence of grazing operations and unauthorized rangeland infrastructure can impact the naturalness and other characteristics of designated wilderness. We support the removal of two-track roads, trailing routes, and unauthorized infrastructure such as stock ponds, fences, stock tanks, and irrigation lines, but the NEPA analysis should explain how virtual fencing can be implemented consistently with wilderness restrictions.”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “Parks must complete a "minimum requirements analysis" (MRA) in order to document the determination of whether a proposed action (project), which involves a prohibited use, is necessary to meet minimum requirements for the administration of the area for the purpose of wilderness. The Wilderness Act in Section 4 (c) identifies the prohibitions (codified at 16 [US Code] U.S.C. 1133(c)) and Section 2 describes the purpose of wilderness (codified at 16 U.S.C. 1131).”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “DO - 41 provides requirements for the management of Wilderness and proposed Wilderness. The majority of the project area is proposed Wilderness. Please review the entire contents of DO - 41 and apply it to the EIS process.”

3.11 ISSUES: WILDLAND FIRE AND FUELS

CONCERN STATEMENT 1: *Livestock grazing can mitigate wildfires and serve as a valuable fire suppression management tool.*

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “Livestock grazing in both parks should be continued in perpetuity as it can be a useful management tool that can benefit the landscape, the wildlife and local economies. It is beneficial in fire suppression and to generate regrowth that deer and elk thrive on.”

3.12 PRELIMINARY ALTERNATIVE A: NO ACTION

CONCERN STATEMENT 1: *The NPS grazing management plan should reflect the BLM and USFS grazing programs and should select the No Action Alternative.*

Organization: *Montrose County Natural Resources*, **Organization Type:** *Local government*

Representative Quote: Given the experience of the USFS and BLM in grazing management, the No-Action Alternative represents the best opportunity for successful implementation of a NPS grazing program.

3.13 PRELIMINARY ALTERNATIVE B: ACTION ALTERNATIVE

CONCERN STATEMENT 1: *The action alternative should include some additional elements including pricing the allotments in line with private grazing rates, making the allotments available to bidders who would pledge to not graze them, and adding specific enforceable requirements for permittees to limit impacts from livestock.*

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “I agree with the Grazing Tools and Strategies Alternative, but would suggest two additional Potential Tools and Management Strategies. 1) Grazing allotments should be priced consistent with private grazing rates so as to not undercut the private market. 2) Grazing allotments should be made available to organizations that would not place animals on the allotment. Opening

up the competition for grazing allotments to bidders who would allow the allotment to “lie fallow”; is an expression of free-market principles that would allow the market to have a say in the use of these lands.”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “The current GMP does not contain the actions required for the preservation of park resources from the impacts of livestock grazing and trailing. The GMP needs to be amended to provide specific and enforceable requirements and limitation to deal with the wide range of impacts from these non-native, private livestock within the park.”

CONCERN STATEMENT 2: The action alternative is too focused on sage-grouse management and does not take an entire ecosystem approach.

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “Secondly, this is selecting for one species in the entire ecosystem, while allowing others to be potentially harmed or left unmanaged. It is poor planning to only manage for one species. Furthermore, as grazing has been on these lands since long before BLM, USFS, or NPS and in greater numbers than we see today without harming these grouse populations (If the grazing did cause harm the populations, the birds would have been gone long before recent years). Instead, after continued management for sage grouse alone, the bird population has continued to decline in areas where our parents and us used to see them regularly. When cattle were abundant, the birds were abundant. It may be a good idea to look somewhere else for the problem when creating the grazing plan.”

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “Today the primary resources of concern are Gunnison Sage Grouse and Bighorn sheep, but I don't think they should be listed as such in the plan, because down the road, it may be another resource that needs special management. And again, it is never good practice to manage a whole ecosystem on only one or two resources. The entire environment needs to be considered.”

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “It is also very important to manage these lands for all species and never manage one or two species over any others. When this practice of managing for only one or two species is used, it can result in long term harm to other species and we want the whole ecosystem to thrive. Be careful not to manage for sage grouse at the expense of other species within the area.”

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “Also, when season of use is adjusted for the breeding season of the GUSG (or any other species), remember to take into account that grazing in the early spring (sage grouse breeding season) may be the best management for unwanted vegetation such as cheat grass and that livestock have likely grazed in that timeframe since the early 1900's or before without harming GUSG populations.”

CONCERN STATEMENT 3: The action alternative should not include language that would prohibit permit transfers and re-issuances in occupied GUSG critical habitat or language that states that allotments would be retired after five years of vacancy. The EA should not identify grazing as the sole cause for the range of issues hindering desired conditions across the landscape.

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “We don't like where the newsletter says that... 'In CURE, after 5 consecutive years of vacancy, the allotment would be retired.' I don't think that this door should ever be completely closed. If there is grass and water available and if there is an interested party, the allotment should be available even if it is years down the road. We also don't like where the newsletter says '...however, NPS would not allow permit transfers and would not re-issue permits in occupied GUSG critical habitat.’”

Organization: *Montrose County Natural Resources*, **Organization Type:** *Local government*

Representative Quote: With decades-long management experience and evolving grazing management in the BLM and USFS, the apparent intent to reinvent grazing management on NPS lands is further evidence of an intent to eliminate this important historical use. Considered alongside the underlying GTSA narrative, the presumed deficit in NPS grazing management experience and management capacity speaks to an organizational incentive (or intent) to eliminate grazing.

Montrose County sincerely hopes that this process allows for the development of an adequate range of alternatives, and an objective analysis that does not mistakenly define grazing as the sole cause for the range of issues hindering desired conditions across these landscapes. Ideally, this process would recognize the conservation efforts of permittees in this area, and the significant contributions producers can provide when acknowledged as partners. Montrose County hopes this process can facilitate an objective, productive, and respectful discourse, and an outcome that does not achieve desired conditions at the expense of agricultural producers.

Organization: *Montrose County Natural Resources*, **Organization Type:** *Local government*

Representative Quote: The title "Grazing Tools and Strategies Alternative," insinuates actions where grazing and management actions can support desired conditions across these landscapes; the finer points of the GTSA speak to "tools and strategies" to eliminate grazing. Among a range of mechanisms, wilderness character, roads, and recreational conflicts are identified in the GTSA as opportunities to limit or eliminate grazing. Existing uses were defined through wilderness designations, travel management, and recreation management planning. The GTSA is not a mechanism to eliminate existing permitted use in these areas, nor is it a mechanism to supersede existing planning efforts. These are not the only examples of this rationale. When the GTSA speaks to the negative impacts of recreation on grazing permittees, the proposed solution is to eliminate grazing; this does not speak to an objective planning process that meets the intent of the National Environmental Policy Act.”

CONCERN STATEMENT 4: The NPS should ensure permittees receive clear communication and advance notice to any changes in grazing season of use or pasture rest periods and should work with permittees to offer an alternate solution.

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “In the case of pasture rest periods, be very upfront with permittees, giving them plenty of notice, communication and offering vacant permits if available. Ranchers rely on these permits and rests should be only used if an alternative is available. Such as grazing in an alternate season than usual or if NPS has helped to find an alternative area to graze, such as a vacant permit.”

CONCERN STATEMENT 5: Monitoring and adaptive management must be mandatory, and the adaptive management framework must define thresholds and trigger points based on measurable thresholds and indicators of impact.

Organization: *Western Watersheds Project*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “The adaptive management framework could be a valuable approach for improving grazing practices, but unless the Grazing Management Plan defines thresholds for acceptable conditions and establishes trigger points to change practices, these adaptive management strategies do not sufficiently address threats to ecological health and species recovery. The adaptive management framework leaves a great deal of latitude to local managers who are under pressure to balance many interests and are not always able to prioritize management for the best outcomes for the ecosystem. Relying on this framework without the necessary accountability and metrics likely will not result in sufficient protections for the ecosystem and falls short of the analysis and transparency that NEPA requires. If NPS is going to utilize an adaptive management approach, it must prescribe standards and trigger points based on measurable thresholds and indicators of impact.”

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: “The suggested monitoring program should be mandatory and allow the agency to adjust or stop grazing to protect the environment.”

3.14 RANGE OF ALTERNATIVES (NEW ALTERNATIVE)

CONCERN STATEMENT 1: The EA must include a reasonable range of alternatives and analyze actions such prohibiting domestic sheep grazing in bighorn sheep habitat, implementing additional timing restrictions, and impounding trespass livestock.

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: "The following requirement must be implemented in all alternatives 8.6.8.3 Trespass and Feral Livestock Livestock trespassing on park lands may be impounded and disposed of pursuant to the provisions of 36 CFR [Code of Federal Regulations] 2.60, with the owner charged for expenses incurred. Wild living or feral livestock having no known owner may also be disposed of in accordance with 36 CFR 2.60."

Organization: *Western Watersheds Project*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “Here, reasonable alternatives to consider include, but are not limited to:

- Requiring a minimum grass length of at least 7 inches;
- Timing restrictions that would protect GuSG from grazing from March 15 to July 15;
- Retiring the grazing allotments;
- Removing further grazing from wilderness areas within the analysis area; and,
- Prohibiting domestic sheep grazing and trailing in areas that overlap with bighorn sheep habitat.”

CONCERN STATEMENT 2: According to the 2006 NPS Management Policies, the range of alternatives in the analysis should include the removal of exotic species, like livestock, from park units and the closure of grazing allotments to restore natural ecological processes.

Organization: *Western Watersheds Project*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “The 2006 NPS Management Policies also direct that it is a priority to reestablish natural functions and processes in parks and in the case of human disturbances return such disturbed areas to the natural conditions and processes characteristic of the ecological zone in which the damaged resources are and encourages removal of exotic species. In the subsection directing management of exotic species the policy explicitly states that “Domestic livestock such as cattle, sheep, goats, horses, mules, burros, reindeer, and llamas are exotic species that are maintained in some parks for commercial herding, pasturing, grazing, or trailing”, but that “The Service will phase out the commercial grazing of livestock whenever possible”(4). Under this guidance, the range of alternatives for this analysis should include removal of these exotic species from the park units and closure of the allotments.”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “In light of the above, it is difficult to think of a situation where it would not be appropriate to address a "no action" alternative. Accordingly, the regulations require the analysis of the no action alternative even if the agency is under a court order or legislative command to act. This analysis provides a benchmark, enabling decisionmakers to compare the magnitude of environmental effects of the action alternatives. It is also an example of a reasonable alternative outside the jurisdiction of the agency which must be analyzed. Section 1502.14(c). See Question 2 above. Inclusion of such an analysis in the EIS is necessary to inform the Congress, the public, and the President as intended by NEPA. Section 1500.1(a).”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “When the Park was originally created, BLM continued to administer grazing permits within the Park. The Supreme Court, on a number of occasions, has ruled that grazing permits on public lands are revocable licenses and do not convey any right or title. So the permits issued at the creation of the Park and those in place now are revocable permits and do not create and right or title.

The laws establishing the units confirm that any permits within the units are revocable privileges. For the above reasons, an EIS without a no grazing alternative will be legally deficient. Also since grazing permits are short-term authorizations, the current characterization of the proposed action as "no action" alternative is incorrect."

3.15 PURPOSE AND NEED: INTERPRETATION OF PARK POLICIES, REGULATIONS, LAWS

CONCERN STATEMENT 1: Allowing grazing and failing to monitor and recover costs associated with response to resource damage violates the NPS policies and other Federal policies including the Organic Act, Redwoods Act, the Comprehensive Environmental Response, Compensation and Liability Act of 1980; the Oil Pollution Act of 1990; the Federal Water Pollution Control Act (as amended by the Clean Water Act of 1977); and the National Park System Resource Protection Act.

Organization: *N/A*, **Organization Type:** *Individual*

Representative Quote: "Grazing should not be allowed in the National Park Service as it conflicts with the Organic Act's mission to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: "Pursuant to applicable provisions of the Comprehensive Environmental Response, Compensation and Liability Act of 1980; the Oil Pollution Act of 1990; the Federal Water Pollution Control Act (as amended by the Clean Water Act of 1977); and the National Park System Resource Protection Act, the Service will

- Determine the injury caused to natural resources, assess all appropriate damages, and monitor damages;
- seek to recover all appropriate costs associated with responses to such actions and the costs of assessing resource damages, including the direct and indirect costs of response, restoration, and monitoring activities; and
- use all sums recovered in compensation for resource injuries to restore, replace, or acquire the equivalent of the resources that were the subject of the action. As stated previously, the NPS has failed to comply with this requirement in regard to damages caused by authorized or trespass livestock. These requirements must be implemented as actions common to all alternatives."

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: "Cost recovery and performance bond and liability insurance requirements will be imposed, consistent with applicable statutory authorities and regulations. All costs incurred by the Service in receiving, writing, and issuing the permit, monitoring the permitted use, restoring park areas, or otherwise supporting a special park use may be paid by the permittee. The money will be retained by the park as reimbursement."

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: "The Senate committee report stated that under the Redwood amendment, "The Secretary has an absolute duty, which is not to be compromised, to fulfill the mandate of the

1916 Act to take whatever actions and seek whatever relief as will safeguard the units of the national park system." Either from the perspective of archeological resources or vegetative or ESA listed species or riparian conditions or other natural resources, the NPS's current authorization of livestock grazing, and its failure to require compliance with NPS policies, is a derogation of your duties as well as a violation of the Organic Act and the Redwoods Act. This failure needs to be clearly and effectively corrected in the EIS and ROD."

CONCERN STATEMENT 2: Current livestock grazing does not comply with section 4.1, 4.6.2, 8.2.3.1 of the 2006 Park Management Policies.

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: "Park surface waters or groundwater will be withdrawn for consumptive use only when such withdrawal is absolutely necessary for the use and management of the park. Current livestock grazing and trailing does not comply with Section 4.6.2."

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: "The record for this process must contain full documentary proof linking current permit holders to the applicable laws. Further, any permits issued without this proof must be immediately revoked and those permits removed from consideration in the Plan"

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: "The permitting of livestock grazing clearly intervenes with natural biological and physical processes. Taking just the example of biological soil crust (BSC), which is a foundational component of the ecosystem. Where livestock grazing takes place BSC is functionally eliminated. None of the exception above apply."

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: "In accordance with 8.2.3.1 permittees are not allowed to use motorized vehicles off designated roads. This requirement must be common to all alternatives."

CONCERN STATEMENT 3: NPS has ignored the statutory requirements for cost recovery, performance bonds, liability insurance, and market-based fees for land use, all of which must be included, along with the cost of the EIS process, in every alternative.

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: "When appropriate, the Service will also collect a fee for the use of the land or facility based on a market evaluation. Fees collected for use of the land or facility will be deposited into the U.S. Treasury."

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: "The NPS has ignored this requirement, but it must be included as common to all alternatives. The Cost of this EIS process must also be included."

CONCERN STATEMENT 4: Livestock grazing on BLCA and CURE is an authorized, not mandatory, use, and should only be permitted by the NPS if it does not result in environmental impairment or unacceptable impacts.

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “In this case, discretionary livestock grazing are causing a wide range of impacts to Park resources, a number of them clearly fitting the NPS's definition of impairment, yet the discretionary uses continue and nothing in the materials provided by the NPS during scoping would indicate that the NPS is going to correct these impacts under any alternative”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “A plain reading of the legislative history clearly shows that livestock grazing on BLCA and CURE is not a "mandatory use" but an "authorized use" which the NPS may allow or disallow, but you are only permitted to allow the use of livestock grazing "provided that the use will not cause impairment or unacceptable impacts.”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “Again, the NPS policies require you to "investigate and determine" if an activity "might have lead or might be leading to an impairment" yet this has not been done despite years and even decades of data coming in showing that impairment is occurring”

3.16 PURPOSE AND NEED: NEPA AND CEQ

CONCERN STATEMENT 1: The NEPA analysis must take into consideration the required baseline data, direct, indirect, and cumulative impacts as required under the NEPA process and should question the validity of the assumptions made in previous NEPA documents.

Organization: *Western Watersheds Project*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “This management direction indicates that the NEPA process must substantively address the threats that livestock grazing and trailing pose to ecosystem health, sensitive native species including Gunnison sage grouse and bighorn sheep, wilderness values, and to the recreational experience of park users.”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “The NPS's analysis must appropriately disclose and analyze the direct, indirect, and cumulative impacts of the alternatives that will be analyzed in this NEPA process. Appropriate cumulative impacts analysis must account for impacts of the proposal when taken together with impacts of other reasonably foreseeable actions”

Organization: *Sage Steppe Wild*, **Organization Type:** *Nonprofit Organization*

Representative Quote: “Without analyzing the accuracy and validity of the assumptions used in previous NEPA processes one has no way to judge the accuracy and effectiveness of the current analysis and proposals. This vitiates the NEPA process. For instance, the EIS for the GMP predicted

only minor impacts from grazing and trailing and assumed certain actions and planning would take place. Those assumptions were incorrect. The predictions made in previous NEPA processes also need to be disclosed and analyzed because if the accuracy was not there, most likely you are making the same predictions in the current process and thus the current process again will be vitiated.”

CONCERN STATEMENT 2: The NEPA analysis should incorporate a no action alternative as required under NEPA Section 1502.

Organization: Sage Steppe Wild, **Organization Type:** Nonprofit Organization

Representative Quote: “An alternative that is outside the legal jurisdiction of the lead agency must still be analyzed in the EIS if it is reasonable. A potential conflict with local or federal law does not necessarily render an alternative unreasonable, although such conflicts must be considered. Section 1506.2(d).”

3.17 PURPOSE AND NEED: PLANNING PROCESS AND POLICY

CONCERN STATEMENT 1: A review of the adequacy of the NPS's implementation of current permits and NPS Policy and GMP direction is essential to a valid NEPA process.

Organization: Sage Steppe Wild, **Organization Type:** Nonprofit Organization

Representative Quote: “For instance, if in previous processes, the NPS said they were going to do a certain monitoring plan or implement a certain type of management and these were never effectively implemented, that is incredibly important for the reader and the decision maker to know. If there have been problems with the NPS's implementation in the past, it is not logical to assume that implementation will now all of a sudden be compliant.”