

Comparison of Key Differences Between Alternative C (plus key missing parts) and Alternative E

ACRONYMS		
EIS	Environmental Impact Statement	
GCNRA	Glen Canyon National Recreation Area	
MMP	1999 Monument Management Plan	
Monument	Grand Staircase-Escalante Nat'l	
SGA	Sustainable Grazing Alternative, the source of Alternative C	
	Alternative C "Key pieces" of Sustainable Grazing Alternative missing from the current Alternative C in Blue	Alternative E
Overall theme	Emphasize restoration of native species diversity. Manage cattle grazing to ensure less impact to resources. Changes in grazing systems (e.g. season of use, intensity, rest) considered before implementing mechanical treatments, or more fencing. Areas currently not grazed ("unavailable" and "unallotted") remain free of cattle. Additional areas identified as unavailable for cattle using voluntary retirements and criteria.	<ul style="list-style-type: none"> • Emphasize current livestock management • Restock two currently cattle-free ("unavailable") Monument allotments to cattle grazing and one to cattle "trailing" • Unallotted areas in Glen Canyon NRA would not be restocked with cattle.
Proportion of the Monument open to cattle grazing	<p>Designation of allotments as available or unavailable for livestock grazing is <u>provisional, based on adaptive management</u>. Areas that are deemed "available" at one time may become "unavailable" depending on site conditions and certain criteria listed in the SGA. Conversely, areas that are currently "unavailable" to livestock grazing due to resource concerns may become "available" if conditions are significantly improved and grazing practices are predicted, on the basis of scientific evidence, to retain the improved resource conditions.</p> <p>Areas currently grazed and meeting or moving toward objectives would remain available for grazing; Areas determined by an EA or EIS to be unavailable for cattle would remain unavailable.</p> <p>~70%-100% (1.5-2.1 million acres) of current cattle-grazed allotments will be grazed, which would mean 66%-94% of total Monument acres</p>	<p>All allotments that will be grazed or not grazed ("available" or "unavailable") by cattle are decided upon in the EIS and Decision</p> <p>98% (2.1 million acres) of current livestock acreage will be grazed, which would mean 92% of total Monument acres;</p>
Proportion of BLM-managed portions of GCNRA open to cattle grazing	~70%-100% (161,210-230,300 acres) of current cattle-permitted acres which would mean (51%-72%) of total BLM-managed portions of GCNRA acres	91% (209,000 acres) of currently cattle-grazed GCNRA allotments will be grazed by cattle which would mean 66% of total BLM-managed portions of GCNRA acres
What constitutes "meeting Objectives"?	Objectives generally will be considered to have been met when monitoring documents the Indicators are at least 80% (e.g., of soil cover, willow density, native plant species richness) of those in reference areas of the same ecological site (e.g., soil type, precipitation, elevation, slope as relevant). Such reference areas may consist of exclosures, ungrazed	<i>[No degree of departure from Objectives is described as too much. This does not allow for independent checking of Monument declaration that an allotment is "meeting standards"]</i>

	pastures/allotments, permanent range cages, or ungrazed recovery reference areas. Conditions below 80% of the reference site(s) are appropriate subjects for problem-solving among the BLM, permittees and interested public.	
Diversity of grazing arrangements	Encourage a diversity of grazing arrangements, including such arrangements as: <ol style="list-style-type: none"> 1. Rest-rotation systems 2. Deferred rotation systems 3. On-off systems 4. Forage reserve areas 5. Collaborative grazing experiments 6. Multiple allotments combined into a single system 7. Reduced use areas 8. Non-use area 9. Closed areas 	Use a variety of grazing systems, such as: <ol style="list-style-type: none"> 1. Rest-rotation 2. Deferred rotation 3. On-off 4. Forage reserves <p><i>[Note: #5-9 of Alternative C are not mentioned]</i></p>
Forage reserves	Currently 14,600 acres are used as forage reserves; additional acres would be determined through a public process	20,700 acres of allotments will be used as forage reserves, including to rest allotments that are not meeting standards. <p><i>[No limit or designated protocols of how often a forage reserve can be grazed by cattle are given.]</i></p>
Voluntary relinquishment	When voluntarily relinquished or otherwise retired, allotments or pastures with Monument objects or values that are not compatible with or are impacted by livestock grazing (e.g., biological soil crust, riparian areas, declining native plant or wildlife species) would be considered for non-use by cattle	Continue current policy of preferring to restock a relinquished permit with cattle. Change the MMP (e.g., to allow for seeding exotic cattle forage plants) and then manage accordingly.
Science	Use science to understand cattle impacts; the potential to move cattle-grazed areas toward conditions observed in ungrazed areas; and to distinguish global warming impacts from cattle impacts.	Use science to research grazing techniques
Public Transparency and Engagement	<ol style="list-style-type: none"> 1. Offer public tours prior to allotment permit renewal, allotment management plan development, or vegetation projects for conditions impacted by livestock grazing. 2. All Environmental Assessments (EAs) will provide for public comment on the alternatives and their analyses. 3. A map and annual plan of use for each allotment (with pastures) will be posted prior to livestock seasonal entry on the allotment. 4. When requested by a member of the public, BLM will participate in a pre-annual permit meeting to discuss problems observed/documentated on a specific allotment the previous year, and proposed solutions to those problems. Such meetings will be available to the permittee and other members of the public. 5. Encourage the establishment of independent, multi-stakeholder, consensus collaborations that include representatives of all relevant stakeholders, for purposes of advising BLM on increasing the sustainability of grazing and diverse grazing arrangements on GSENM/GCNRA. The collaborations would be convened or co-convened by non-BLM entities. 	<i>[No provisions for public transparency/engagement are described.]</i>

	6. Interested members of the public will be encouraged to participate in and contribute to on-ground implementation and monitoring of grazing experiments developed by interested public, permittees and BLM personnel.	
Problem-solving with the public (including permittees)	Interested publics, including permittees, are encouraged to engage with the BLM to discuss and propose management options where conditions in grazed areas are more than 20% reduced from those exhibited in areas not grazed by cattle or where significant, measurable progress is not being made toward restoring habitat for Federal threatened or endangered species, or candidate or proposed threatened or endangered species, or other special status species	<i>[No provisions for problem solving with the public are described.]</i>
Reference Areas	<p>Use large and small ungrazed areas as reference sites to (1) compare with cattle grazing; (2) monitor recovery when a grazed area is no longer grazed; (3) separate climate change impacts from cattle impacts.</p> <p>Reference areas are established across GSENM/GCNRA that represent the full range of ecosystem and plant community types (both riparian and upland) including sites that have received exotic vegetation treatments. A reference area, with the exception of reference areas established to determine rates of recovery without cattle grazing, consists of a site that has not been grazed or accessible to livestock for at least ten years.</p> <p>At least 2 permanent range cages (16' X 16') are maintained in each grazed pasture, in representative areas frequently used by livestock.</p>	<p>Use grazed areas to experiment with cattle grazing. Use reference areas (no mention of size) to separate climate change impacts from cattle impacts.</p> <p><i>[No commitment to establish a series of reference areas across plant community types.]</i></p> <p><i>[No mention of establishing range cages to understand differences between grazed and ungrazed conditions.]</i></p>
Utilization cages	For purposes of quantitatively measuring utilization, utilization cages must have been in place for two years (rather than one) in order to more accurately depict expected production.	Utilization cages are moved every year, allowing for cattle utilization of 40-60% to be compared to what has grown up from a site heavily grazed the past year.
Biological soil crusts	Protect biological soil crusts from trampling and other physical disturbance within at least 60 percent of their predicted available habitat within GSENM; and 80 percent within Glen Canyon NRA.	Continue to allow cattle grazing biological soil crust throughout nearly all of the Monument.
Native, threatened, endangered, and other special status species	"Significant progress toward restoration of habitat" for threatened, endangered, proposed, candidate or other special status species is demonstrated by maintaining progress at a rate that is 80% that of relevant ungrazed recovery reference areas.	<p>Native, threatened, endangered, and special status species are maintained at a level "appropriate for the site and species involved."</p> <p><i>[Note: What does a "level appropriate for the site" mean? Appropriate for a heavily-grazed site?]</i></p>
Vegetation treatments	Vegetation treatments will (1) have the objective of restoring or supporting potential native vegetation and ecosystem processes; or (2) addressing underlying causes of the problematic conditions prompting vegetation treatments.	Change the MMP to allow for vegetation treatments (e.g., tearing out sagebrush and seeding exotic species) with the purpose of increasing cattle forage.

		<p><i>[Note, in recent years, the Monument has been undertaking such treatments on many thousands of acres in violation of the current MMP]</i> Changes MMP to allow for mechanical maintenance and retreatment of existing vegetation treatments and seedings within in the primitive zone, which is currently prohibited.</p>
Seedings	<p>Seed only native species. Provide measureable. Desired Conditions for post-treatment. Protect seedings from livestock until a majority of the native plants have seeded.</p>	<p>Change MMP to allow seeding of exotic plants for cattle forage (i.e., not only emergency situations). “Modify” cattle grazing until seedings have “established”. Deemphasizes native species survival.</p> <p><i>[No commitment to establish measureable Desired Conditions for seedings or undertake post-treatment monitoring of seedings to view the short- or long-term outcomes of the seedings]</i></p>
Noxious weeds/invasive species	<p>Non-chemical methods and removal of stressors are the first priority for preventing the introduction, establishment, and/or spread of noxious weeds and/or non-native, invasive species.</p>	<p>No prioritization of non-chemical methods or removal of stressors (e.g., cattle) that are causing introduction, establishment or spread of noxious/invasive species; allows ground and aerial spraying of herbicides</p>
Structures for cattle management	<p>Evaluate structures (fences, water developments) associated with livestock grazing for utility, historical significance, or other purposes and remove unless needed to meet objectives for natural and cultural resources. Cabins for permittees are not appropriate in GCNRA.</p> <p>Fencing necessary to meet Objectives will be built by permittees; and fencing must be functional prior to cattle entry in the season.</p>	<p>Authorize more structures for cattle. Allow new water developments and permittee cabins to be built in Glen Canyon NRA.</p> <p><i>[No mention of permittee responsibility to construct fences necessary for the cattle grazing to meet Objectives; or to maintain fencing prior to cattle entry.]</i></p>
Water for cattle	<p>Where water developments are necessary for livestock grazing and protection of Monument values, such developments will be fenced and will protect associated wetland/riparian resources. On/off valves will ensure that water remains in its natural course/site at all times livestock are not present in the allotment/pasture.</p> <p>The permittee(s) will manually maintain an area free of all invasive, exotic plant species within 100 feet radius of a watering trough or watering pond.</p>	<p>Changes MMP to allow for water developments that increase cattle numbers, which is currently prohibited. Streams and springs can be temporarily dewatered to fill troughs and water tanks. On/off valves would be required only in new water developments.</p> <p><i>[No indication of permittee responsibility for removing noxious or invasive weeds around cattle watering troughs or ponds.]</i></p>

Cattle use timing/rest	During winter grazing [i.e., most of the Monument], use rest rotation and do not graze an area more than 2 out of 3 years. When grazing occurs during the growing season (e.g., Spring, Summer, Fall) there will be at least 6 weeks between the end of seasonal use of a particular area one year and when the season of use begins the following year. If this is not possible in a particular area, the area will be rested every other year.	Adaptively manage cattle to meet standards. <i>[No mention of scheduling rest on otherwise annually grazed areas.]</i>
Limits to utilization of plants by cattle	Utilization of plants will be no more than 30%; and in drought years no more than 25%	Utilization of 40% to 60%
Allotment Action Plans	When monitoring shows an allotment/pasture is failing to meet or move towards Objectives, allotment action plans will be drawn up for meeting or moving towards Objectives. The plans must be based on evidence that the proposed activities or management have resulted in movement toward the particular Objectives in other settings and must include methods for measuring whether conditions are improving under the action plan.	<i>[No specific plans offered for when allotments are not meeting or moving toward Objectives.]</i>
Riders	Where allotments are not meeting or moving toward objectives, a rider will be present 5 out of every 7 days throughout the season of use.	No expectation of riders when allotments are not meeting or moving toward objectives.
Recreation	Reduce some cattle conflicts with recreation in the Monument and GCNRA through reduced grazing as relinquishment or other opportunities arise. <i>[Here BLM inaccurately represents the SGA as proposing to remove cattle in particular areas near the Gulch, Buckskin Gulch, and Paria-Hackberry, though the areas have not been voluntarily relinquished and the BLM is not proposing to close them]</i>	Emphasize fencing and season of use to reduce cattle conflicts in some specific recreational sites (e.g., campgrounds).
Wild ungulates	Where wild ungulates threaten a vegetation treatment, initiate communication with the Utah Division of Wildlife Resources and/or Arizona Game and Fish Dept.	<i>[No mention of working with state wildlife agencies if wild ungulate populations are a problem (e.g., excessively browsing young native species)].</i>
Social and Economic Indicators	The social and economic sustainability of GSENM/GCNRA livestock grazing will be monitored according to several indicators, including both the economic and cultural values of livestock grazing, and the social value of participation in grazing management decision-making by diverse stakeholders. Social/economic indicators are best developed via consensus among BLM, GSENM, GCNRA personnel; permittees; and interested publics.	<i>[No mention of establishing indicators of public participation, economic or social values of livestock grazing.]</i>
Goal for wildlife and wildlife habitat	Native plant communities support the following, at levels of at least 80% of relevant ungrazed reference areas: <ol style="list-style-type: none"> 1. Pollinator diversity 2. Cover, nesting, calving, and/or food habitat for native declining, uncommon, and endemic vertebrate animals. 3. Diversity of native aquatic biota. 4. Diversity of soil invertebrates. Habitats are connected at a level to enhance populations of native species, including pollinators, based on estimated connectivity requirements using best available science.	<i>[No goal for wildlife or their habitat is mentioned, even though cattle grazing can degrade wildlife habitat]</i>