



GRAND STAIRCASE-ESCALANTE NATIONAL MONUMENT MANAGEMENT PLAN IMPLEMENTATION REVIEW

Prepared for the Director of the Bureau of Land Management

August 4, 2010

**GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT
MANAGEMENT PLAN IMPLEMENTATION REVIEW
AUGUST 2010**

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Introduction

The Grand Staircase-Escalante National Monument (GSENM) is the Bureau of Land Management's (BLM) first and largest national monument. Designated by Presidential Proclamation on September 18, 1996, pursuant to the Antiquities Act of 1906, it contains 1.9 million acres of public lands in southern Utah. The BLM manages the GSENM to protect the unique objects of historic and scientific interest for which it was designated, including geological, paleontological, archaeological, historical, ecological, and biological. The Proclamation allows certain existing uses, such as the exercise of valid existing rights and grazing.

Land use plans are the foundation for the BLM's management of the public lands. They are more than merely documents; they are a commitment to the people with a vested interest in the lands and to the lands themselves. The GSENM was the first National Monument in the BLM and the first to have a land use plan. Ten years later new information, policies, attitudes, and practices have come to bear on our evolving understand of how best to manage these special public lands.

Since February 2010, a team (Review Team or Team, see Appendix A for list of members) led by the Washington Office (WO) has been reviewing the implementation of the GSENM Management Plan (Plan). The purpose of this review is to determine the nature and scope of implementation since the GSENM Plan was approved in 2000, with particular attention to travel management, rangeland management, and vegetation management. This report presents the Team's findings and recommendations.

FINDINGS IN BRIEF

Based on a review of thousands of pages of documents and nearly one hundred interviews, the Team finds that:

- The Plan expresses the vision and intent of the GSENM's establishing proclamation.
- It has been challenging for the GSENM and the Utah State Office to consistently implement the Plan in the absence of a comprehensive implementation strategy.
- There continues to be internal and external controversy concerning interpretation and implementation of the Plan. This contributes to ineffective Plan implementation, a perception of inconsistent management of the GSENM, and to internal and external confusion regarding policy and priorities.
- Current staff and management are making positive efforts to return to the Plan's direction and intent and to design a functional implementation plan.

RECOMMENDATIONS IN BRIEF

The Team recommends that the GSENM and the Utah State Office:

- Submit an action plan to the Director that outlines the steps they will take to address the findings and recommendations of this review by September 30, 2010.
- Make Plan implementation a priority at GSENM by beginning the BLM-accepted land use plan implementation strategy process in 2010.
- Conduct and approve a comprehensive formal plan evaluation that builds upon the evaluation begun in 2007. The evaluation should address the findings in this report and provide guidance on whether to amend, revise, update, or otherwise maintain the Plan. The evaluation must also clearly identify the Monument's objects and assess how well the Plan's decisions and implementation actions protect the objects.
- Revise the GSENM's Table of Organization to improve coordination and cooperation; reflect workloads associated with Plan implementation priorities; and alleviate internal conflict and inconsistency.
- Ensure that critical positions are filled and that the GSENM has the expertise it needs to more fully and effectively implement the Plan.
- Renew the GSENM's commitment to a focus on science and science-based decision making, especially where natural and cultural resources are concerned. Ensure that this focus is reflected in the Plan implementation strategy.
- Continue to work with the interested public and applicable agencies and organizations to resolve issues regarding travel and transportation management, grazing administration, and protection of the objects identified in the Monument's proclamation.

Methodology

The Review Team reviewed quantitative data and validated them with qualitative assessments in order to yield the most reliable results. The Team followed a three-phase process:

1. *Gather and analyze planning, budget, performance, and other relevant data.* The Team reviewed and analyzed source documents, such as budget directives and data since the year 2000, databases and other tracking tools prepared by and for the GSENM that show the evolution of plan implementation, annual Manager's Reports since 2006, news reports since 1996, original research from credentialed experts, tables of organization, and NEPA logs. The Team created a matrix to show how the Plan's decisions and budget accomplishments

work together, and conducted a data gaps analysis. See the Plan Decision and Budget Accomplishment Matrix for results (available upon request).

2. *Conduct internal and external interviews on-site and by phone.* The Team interviewed almost 100 BLM staff and managers, other federal employees, local government officials and employees, local business owners, and members of the public on site in Utah. The purpose of these interviews was to validate the data from phase 1, gather additional data identified in the gaps analysis, and provide qualitative information on which to base findings and recommendations.
 - a. *Internal.* BLM employees were asked both general questions and questions specific to their programs. The questions were based on the 2007 Plan Evaluation conducted by the Utah State Office. See Appendix B for a list of the questions.
 - b. *External.* Non-BLM employees were asked the following six questions:
 - i. What is your general impression with implementation of management actions in the Monument?
 - ii. What do you consider are the most important actions that have been implemented and why?
 - iii. Are there barriers to implementing actions? What are they?
 - iv. Has communication between the Monument Manager and/or staff and you or your organization been adequate and effective?
 - v. What are areas you feel could be improved to meet the Monument Management Plan goals?
 - vi. Do you have any other areas of success or concerns you would like to share?
3. *Synthesize results into findings and recommendations.* The Team synthesized its findings in a series of meetings and correspondence and developed recommendations based upon the information received.

Major Findings and Recommendations

The nature and scope of GSENM management plan implementation is a study in contrasts. On one hand, there are areas of solid consensus. On the other, there are areas of disagreement internally and externally. The Major Findings and Recommendations section highlights cross-program or cross-decision findings.

The Team's overarching recommendation is that, by September 30, 2010, the GSENM and the Utah State Office submit an action plan to the BLM Director that outlines the steps they will take to address all the findings of this review and provide increased and sustained attention and resources to the Monument.

Organization, Staffing, Coordination, Communication, Budget, and Visitor Center Funding and Operations

There was nearly unanimous agreement that the current organizational structure of the GSENM has led to divisiveness, inefficiency, and decreased performance. Though there are not hard data to prove a causal connection, the Team's analysis of available data and corroborating interviews shows at least a correlation between changes over time and reduced Plan implementation effectiveness. Several successive Tables of Organization have resulted in an internal division between the northern part of the Monument based in Escalante, Garfield County and the southern part of the Monument based in Kanab, Kane County. This has created a sense of two monuments with two separate sets of priorities "with the border right at the county line," according to one interviewee. One of the team's fundamental findings is that the current organizational structure is limiting the GSENM's ability to implement the plan effectively and systematically.

The current Table of Organization also marked a shift from a functional-structure to a division-structure organization. Many feel that the new structure has resulted in unclear management direction, broken lines of communication, feelings of isolation, and less Monument-wide coordination. They also cite a perception of undue concentration of power, influence, and funding in Kanab (where the GSENM's headquarters is located) at the expense of the other gateway communities, despite the majority of visitation occurring near Escalante. Most employees also noted decreased morale and loss of personnel, especially among the science staff. Many staff have not read or do not know the Plan and are not aware of how it is to be implemented. There is strong evidence that current GSENM management is working to change this situation.

According to Utah State Office records, total funding for the GSENM was \$10,493,000 in 2003 and is \$5,592,000 in 2010. A large part of the change in total funding for the GSENM is due to the expenditure of funds allocated to the Monument for the construction of the visitor centers. Construction funds are dedicated to a specific one-time purpose and are not part of the GSENM's base funding.

Base funding for the GSENM in the Management of Lands and Resources (MLR) subactivities was \$6,071,000 in 2003 and \$5,318,000 in 2010. Using the Utah AWP Worksheets as the source data, the base funding for the GSENM in the MLR subactivities was compared to the base funding for the other Utah Districts. MLR Base funding for the GSENM declined 24.4% from 2003 to 2008, while for other Districts it increased 6.1%. Three programs account for most of the base decrease: Lands and Realty Management (-\$254K), Operations Management (-\$215K) and Annual Maintenance (-\$499K). The decrease in Lands and Realty Management funding is due to the reduction in workload experienced by the GSENM in this program.

The Monument was given a dedicated source of funding in 2009 from the reprogramming of MLR funds into the new National Monuments and National Conservation Areas subactivity (1711). In addition, in 2009 and 2010 the GSENM was allocated base increases by the WO in the Law Enforcement program and Subactivity 1711. These MLR base increases will help stabilize funding for the Monument.

The Team was not able to determine the reasons behind the decreases in the Monument’s Operations Management and Annual Maintenance funding. Although the decline in funding for visitor centers and visitor services has been an issue for years, it has not received enough assistance and attention after being brought forward to the Utah State Office and Washington Office. The cost of visitor centers is around \$800,000 per year, excluding the cost of leases. Out of necessity the GSENM has been funding its visitor centers out of base funds at the expense of other resource programs.

In budget terms, GSENM has the largest allocation of any individual NLCS unit. However, its discretionary funding has decreased as labor and operations costs have increased, especially those costs associated with managing the visitor centers. This has resulted in a net loss of funding and capacity to implement the Plan. Workload priorities in this environment of declining capacity have tended to focus on use authorizations, demand driven workloads and non-discretionary actions. As staff turnover occurred, positions in these areas were often filled first. Many interviewees reported that the GSENM started with a strong protection and science focus but now resembles a traditional, non-NLCS BLM field office in terms of budget priorities. Science and backcountry recreation staff reported feeling marginalized and their projects deprioritized over the past several years. As above, there is evidence that current GSENM management is working to change this.

Organization and Staffing; Communication and Coordination; Budget; Visitor Center Funding and Operations		
Topic	Findings	Recommendations
Organization and Staffing	High turnover of staff, especially in management, has impacted the GSENM’s ability to manage resources and to establish, communicate, and execute priorities effectively.	Conduct workforce planning and restructure the GSENM organization in order to redefine and clarify functions; create a simpler and more transparent decision making hierarchy; determine whether supervisor to employee ratios are appropriate; and create an organizational structure that fosters sharing of resources across organizational and geographic boundaries.
Communication and Coordination	The Table of Organization (TO) has been changed numerous times in the past few years. Staff expressed displeasure at the current arrangement because they believe it makes lines of authority, decision making, roles and staff functions confusing. Some believe that the current arrangement prevents work from being done, or hinders prioritization and consistency. Most staff thought there were too many managers.	After revising the organizational structure, continue teambuilding efforts and mentoring of new staff and managers. Expand team-building to more employees to solidify a shared vision/purpose for the Monument.
	The GSENM Manager has formed subcommittees to try to deal with issues comprehensively. Some feel that these are effective; others feel they are another unneeded layer and/or preclude input from others. Improvements in the functioning of interdisciplinary teams were noted.	
	There is a strong perception of a “north-south split” between the Kane County and Garfield County-based offices and staffs, and a sense that power and influence are concentrated in Kanab at the expense of Escalante, Cannonville, and Big Water. This has affected the Monument’s <i>esprit de corps</i> .	Management should be sensitive to the “north-south” issue and spend more time on the north side of the GSENM. Conduct meetings, site visits, or other activities in Escalante and Cannonville to maintain positive communication and working

	<p>Overall employee morale and commitment to the GSENM mission is mixed. A large number of interviewees felt that morale was improving as a result of efforts by the current Monument manager. Many felt that current management is doing its best to resolve issues, but more work needs to be done. They also want management to get more support from the State Office. Overall, there remains wide disagreement over the proper use, allocation and management of resources on the Monument, the meaning of multiple-use, how best to restore ecosystems, and the best resolution of major issues.</p> <p>Communication and coordination—both internally and externally—need improvement. Some employees stated that managers have provided staff with inconsistent messages regarding the Monument’s priorities and overall mission. Others stated that internal communication both within the monument and between GSENM and the Utah State Office needs attention.</p>	<p>relationships with staff and publics.</p> <p>Continue to improve communication and coordination internally. When issues are raised to the WO by stakeholders, they should be referred back to the Utah State Office and addressed collaboratively by the Utah State Office and the Monument Manager. Develop a plan for improving communication among the Monument, Utah SO and WO.</p>
<p>Budget</p>	<p>Despite the Monument’s efforts to leverage its funding, the Team found that additional funding is needed to fully implement the Plan. Several staff noted that there seems to be a priority to fill certain positions (such as range) but not others (such as science). Many internal and external interviewees stated that funding for the science program has declined but did not know why. The combination of higher labor costs, the addition of five visitor centers, and a declining budget have affected the science program and other key Plan implementation priorities.</p> <p>The acting Administrative Officer is improving the transparency of the internal monument budget process, providing information, and involving GSENM staff budget decisions.</p> <p>The Monument has been very effective in pursuing additional funding for science-related projects through programs such as Challenge-Cost Share and Take It Outside.</p> <p>Because it is a self-contained organization reporting directly to the State Director, it does not have a supporting District structure. Utah’s transition to a three-tier organization has affected the GSENM’s access to needed support services such as Force Account.</p>	<p>The Utah State Office and the GSENM should develop funding strategies for key positions and use of lapse funds to meet operational needs. The State Office should also develop a funding strategy for the Monument based on the needs identified in the GSENM’s Plan implementation strategy.</p> <p>The Utah SO should clarify the process for obtaining approval to fill positions on the Monument TO and help the Monument quickly fill vacancies on the approved TO.</p> <p>Establish budget priorities based on a consideration of the appropriate factors for the GSENM, including direction from the Proclamation, the Monument’s science mission, the Plan, the NLCS, and the on-the-ground resource situation. Alleviate the strain of declining budgets and increasing costs by pursuing partnerships, volunteers, and other opportunities to leverage non-appropriated resources.</p> <p>Examine opportunities for other units to assist the GSENM with needed support functions.</p>

<p>Visitor Center Funding and Operations</p>	<p>Although the visitor centers serve a very valuable role in the Monument and surrounding communities, they are resource-intensive and require a long term funding commitment.</p> <p>The cost of the GSENM visitor centers is around \$800,000 per year, excluding the cost of leases. Out of necessity the Monument has been funding its visitor centers out of base funds at the expense of other resource programs. The staffing level on the Monument has increased from 60 to 100 positions over the years, primarily because of the visitor centers.</p>	<p>The Utah State Office should work with the GSENM to develop a strategy/business plan that addresses the long term needs of the Monument’s visitor centers.</p> <p>As part of the business planning process, the GSENM should evaluate the individual visitor centers and identify options for increasing efficiency; reducing costs; further coordinating staffing and operations; incorporating best management practices from other agencies; and pursuing opportunities to increase the involvement of partners and Friends groups.</p>
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Land Use Planning

Before the Team began its analysis and synthesis, it had been suggested that the Plan was not being effectively implemented. When questioned about the Plan, the Team found that knowledge and information about the plan varied among interviewees. In addition, BLM staff members expressed either a strong knowledge of the Plan and a desire to “return to the Plan” or an almost complete lack of knowledge about the Plan.

Land Use Planning		
Topic	Findings	Recommendations
<p>Plan</p>	<p>Generally, interviewees stated that the Plan, as originally written, adequately represents the vision and intent of the Proclamation that created the GSENM. A majority of all interviewees expressed support for the Plan as a whole, with certain exceptions, such as for travel management (i.e., the route designation map known as “Map 2. Refer to the Travel and Transportation Management Section for further discussion). Most interviewees thought the Plan was a good basis from which to implement the Monument’s goals. Most thought that the age of the Plan lends itself to evolution and adaptive management.</p>	<p>Ensure that all staff have read and are familiar with the Plan, especially the parts they will implement.</p> <p>Inform the interested public about the Plan, its nature and scope, and how it is the document that guides management actions at the GSENM.</p> <p>Ensure that the GSENM has a dedicated, full-time Planning and Environmental Coordinator.</p> <p>See below for additional Plan-related recommendations.</p>

Implementation	<p>Analysis of budget documents, NEPA logs, annual reports, and interview notes indicate that the Plan is not being fully implemented. This is consistent with an RMP of the Plan's age. However, there is also evidence that the Plan is not being implemented systematically or sequentially according to any established priorities, and that the importance of the Plan is not conveyed to staff. Exceptions include the paleontology program, the Escalante Watershed Project, and certain others. To date, neither an implementation plan (a step-down plan to implement the plan decisions) nor an implementation strategy (a framework for budget-planning-policy integration) have been developed for the GSENM.</p>	<p>Develop a Plan implementation strategy using the BLM-accepted process. Conduct a workshop to establish plan implementation priorities during FY2010 or FY2011.</p> <p>Conduct a formal plan evaluation, according to regulations and policy, and use the outcome to determine the scope and extent of needed plan revision, amendment, or maintenance.</p> <p>Use the framework developed by the GSENM in 2007 (or a similar process) to track Plan decisions and completed implementation actions. Tie this framework to the Plan implementation strategy.</p> <p>Ensure that proposed actions identify the applicable Plan standards and clearly describe how the Monument objects outlined in the proclamation will be protected.</p>
Monitoring	<p>The Plan calls for a monitoring strategy with core data element collection and specific types of monitoring. The Team found that plan monitoring occurred from 2000-2004 by way of a database, but since 2004, plan monitoring has either not been done or has not been centrally documented.</p>	<p>Update the database that was in use from 2000 to 2004.</p> <p>Complete the Plan-Budget Matrix developed for this report by adding a short narrative and any available quantitative data about how each Plan decision has been implemented or is planned to be implemented, and the degree of effectiveness thereof.</p> <p>Use the backcountry rangers' database, recreational monitoring data collected by Northern Arizona University, and other monitoring data sources to augment the Plan monitoring database.</p>
Evaluation	<p>The Plan calls for an evaluation schedule to be set to detect changes, avoid crises, and allow for corrections in management direction. The Plan calls for two evaluations: one every two years and one every five to ten years. Both are supposed to be carried out by the Monument Science Team in conjunction with the Monument Advisory Committee. Neither evaluation currently exists, nor is there evidence that either type of evaluation has occurred in the past ten years. A formal plan evaluation, led by the Utah State Office,</p>	<p>Conduct all evaluations called for by the Plan.</p> <p>Conduct a formal plan evaluation led by the State Office. Track Plan decisions and associated implementation actions by using the framework developed in 2007 (or a similar process) and augment it with new and additional information.</p>

	<p>was conducted in 2007 but was never finalized and signed. This has led to concerns about the absence of the comprehensive and rigorous reviews required by the Plan.</p>	<p>Identify and address roadblocks associated with the Plan evaluation process.</p>
<p>Maintenance and Amendments</p>	<p>No plan maintenance has occurred since the Plan was approved in 2000.</p> <p>No supplemental rules have been issued to enforce Plan decisions regarding rock climbing, collecting, and other activities. Although a Federal Register notice package for these rules was prepared several years ago by the Monument, the package was never finalized.</p> <p>Two amendments are being proposed for the GSENM Plan:</p> <ul style="list-style-type: none"> • The Rangeland Health EIS and Plan Amendment are being developed because the land use plans that provide direction for livestock grazing and rangeland management for the Monument are more than 20 years old. The GSENM Plan did not address most of these prior livestock grazing decisions, so these earlier and outdated plans continue to govern livestock use and rangeland management until the Amendment is completed. The GSENM Plan directs that rangeland health assessments and updated allotment management plan be completed by July 2003. • The Garkane/Tropic to Hatch EIS responds to a proposal for an energy transmission line from Tropic to Hatch by Garkane Energy Cooperative. The Proposed Action involves the construction of a 30.41-mile 138 kV transmission line, 3.68 miles of which would cross the GSENM under the Preferred Alternative. Although there is an existing kV powerline and corridor in the proposed route through the Monument, implementation of the action would require amending the GSENM Management Plan by designating a 300-foot wide Passage Zone corridor through an area currently designated as Primitive Zone in the Management Plan, and to change the existing VRM Class designation from Class II to Class III within this corridor. WO review of the Draft EIS found that a clearer analysis of effects on the monument objects is needed. This will be addressed in the Final EIS. 	<p>Consider new data and information and conduct appropriate Plan maintenance.</p> <p>Issue supplemental rules to enable enforcement of plan decisions.</p> <p>The GSENM is preparing an action plan for completing the Final Rangeland Health EIS and plan amendments. The action plan will be presented to the Utah State Director by early August 2010. Before finalizing, the GSENM should submit the action plan and schedule to the WO for review.</p> <p>See the Rangeland Health EIS section for additional recommendations.</p> <p>Complete the Tropic to Hatch EIS and ensure that it clearly identifies monument objects and how they will be protected.</p>

Science

The Proclamation makes science a central part of the GSENM’s mission. The Team received overwhelming (nearly unanimous) feedback from interviewees that science is part of the foundation of the GSENM’s establishment, that the Plan is science-focused, that science “is what makes [GSENM] special.” However, budget priorities and management actions have resulted in less attention to science in the GSENM over time. Many interviewees were concerned about the decline in funding for the science program. Many also believe that the science program is a way to positively engage the local community and citizen scientists in management of the Monument. Protocols for integrating science into the Monument’s decision making process do not exist, and efforts to initiate them have not been successful. This lack of process has led to disagreements between some GSENM staff who want to implement projects using existing information and experience and others who believe that more inventories or monitoring may be needed for science-based decision making.

Science	
Findings	Recommendations
<p>GSENM offers unparalleled opportunities for discovery and the enhancement of scientific knowledge, as well as opportunities to showcase new, innovative, best practices for multiple uses consistent with the protection of Monument objects, and can serve as a basis for local economic development.</p> <p>This focus on science has not been the driving management priority in recent years. Current staff and management express a desire to return to science-focused management. Interested publics interviewed all viewed science positively and desire a return to science.</p>	<p>Fill the science coordinator position.</p> <p>Complete a Science Plan, in accordance with the NLCS Science Strategy. The Science Plan will outline the scientific mission for the GSENM, identify science needs and the strategy for meeting these needs, specify how science will be integrated into management decisions, and describe how scientific findings will be delivered to the public.</p> <p>Ensure that on-the-ground projects have a clear tie to science and have been reviewed for sound science practices. Ensure that on-the-ground proposals meet NEPA standards to consider the best available information and data before decisions are made.</p> <p>Work with educational institutions to encourage science projects that engage youth, further the protection of Monument objects, and benefit local communities.</p> <p>Educate staff and the public about the nature of science at the GSENM.</p>

Travel and Transportation Management

GSENM recreation staff identified travel management plan issues as the top priority that they deal with on a day-to-day basis. This includes, but is not limited to, responding to public inquiries at the visitor centers, identifying travel conditions and safety hazards on routes, and explaining the Plan’s route designations that have not been signed on the ground.

Revised Statute 2477. R.S. 2477 claims by Kane and Garfield counties have been one of the most contentious issues on the Monument. In the past, the counties have removed BLM route signs which have severely hampered the BLM's ability to implement the Plan's route designations. After a recent court decision in favor of the BLM regarding R.S. 2477 issues, Kane County is now refusing to maintain any of their county roads within the Monument. The County's refusal to maintain routes in the Monument is creating adverse effects to public access and safety. GSENM staff are continuing their efforts to work with the County to address this situation.

Travel Management Plan. Both internal staff and external stakeholders recommended revising the route designations established in the Plan for portions of the GSENM. For a variety of reasons (mainly ongoing litigation from the counties), the travel management plan has yet to be implemented using a coordinated or consistent signing program allowing for enforcement on-the-ground. This makes it very difficult to determine whether route designation revisions are necessary. However, the following points were consistently identified throughout the week of interviews as reasons why the travel management plan should be revised:

- A number of interviewees said that the reasons why the Plan closed some routes and left others open are not clear. Many believe that public use of certain closed or administrative routes would not adversely affect Monument values. Current Monument staff cannot provide a clear explanation to the public regarding the reasons behind the Plan's travel management decisions because of how that portion of the Plan was developed, the length of time that has passed since the decisions were made (ten years), and the confusing environment created by the ongoing litigation. This lack of explanation and public understanding fosters distrust rather than dialogue concerning management of the Monument. Interviewees recommended re-evaluating route designation decisions on a route-by-route basis in order to provide opportunities for public input and to share information about decisions to close specific routes.
- If implemented, the existing route designations would deny motorized access to numerous well known destinations identified in international travel guides, including, but not limited to arches, dinosaur tracks, petroglyphs, town sites, ruins, scenic overlooks, and hiking opportunities in Wilderness Study Areas (WSA). External interviewees stated that the Monument is too vast for such large areas to be closed to motorized access. They cite concerns that visitors cannot safely or physically walk the distances necessary through the harsh desert environment with sufficient water to reach popular destinations included in international guidebooks.
- There is no detailed map of Monument routes with corresponding signs on the ground. Interviewees felt that the lack of a map showing all routes (including administrative routes) is confusing to the public, makes it easy for new visitors and non-English speakers to get lost, and creates safety concerns.

The Monument should renew its efforts to move forward with implementation and potential refinement of the travel management plan and reach out to the stakeholders who are increasingly

willing to work with them. The Team recognizes that travel management will likely remain a complicated and at times contentious issue for the GSENM.

Off-Highway Vehicle Use. Both internal and external stakeholders stated their belief that reports of widespread resource damage from OHVs has been exaggerated and misconstrued and believe that a more balanced assessment is necessary. Monument staff have accompanied external stakeholders into the field on multiple occasions to identify and discuss cross-country vehicle travel issues. However, there continues to be a difference in opinion, with some stakeholders still concerned that widespread problems and resource damage are occurring. This opinion is not shared by the GSENM staff, and the Team did not obtain definitive information to the contrary. In addition, while historic short spur routes to campsites are not identified on maps and Monument staff do not believe that they are currently causing major resource impacts, these spur routes are a major concern for some stakeholders. Monument staff stated that they want improved communications with the Utah State Office and the Washington Office in order to more effectively respond to OHV management issues as they arise.

Interviewees conveyed overall positive experiences with Monument law enforcement staff. Interviewees expressed that law enforcement has been good at enforcing the Monument's restriction on cross-country travel, even though the overall law enforcement presence throughout the Monument is very low. Backcountry Rangers stated that restoring new routes into WSAs is a major priority and that they are continuously challenged to stay on top of recent intrusions. The Monument maintains a backcountry monitoring database that tracks route restoration efforts and allows BLM employees stationed anywhere in the country to access it.

The following items provide specific examples of travel and transportation management-related concerns that have been raised in the GSENM.

All-American Highway 12. The Team found that the projects proposed on and near Highway 12 by the Utah Department of Transportation, the Federal Highway Administration, and the BLM have a sound basis in civil engineering and public safety concerns. Though final decisions have not yet been made, management assured the Team that any conflicts between WSAs and public safety would be resolved according to applicable WSA law and policy. The proposed location of a Highway 12 rest stop was identified as an issue by Boulder residents due to potential impacts to night sky visibility and local tourism.

Hole-the-Rock Road. This is a popular route with historic significance to early Mormon pioneer settlements. The route leads through the Monument in both Garfield and Kane counties and into the Glen Canyon National Recreation Area (GCNRA). Due to a recently published book on Mormon pioneers, visitor use of the route is rapidly increasing. At the same time, road conditions are rapidly deteriorating because Kane County is not completing any maintenance on the Kane County portion of the road which runs through both the GSENM and the GCNRA. The GCNRA has expressed a willingness to work out an interim maintenance agreement with the BLM for the Hole-in-the-Rock Road to provide for visitor safety.

Paria Wash and Paria Ride Day. In support of the WSA non-impairment standard, the Monument Plan closed Paria Wash to OHV use. Residents and officials in Kane County held a

controversial “Paria Ride Day” in May 2009 which encouraged off-highway vehicle riders to use the Paria River Wash in disregard of a BLM closure. This event was the result of years of unclear practices and disagreement with respect to the wash. Over the past few years, signs notifying the public of the Paria Wash closure have been repeatedly removed. Many local interviewees indicated their strong feelings that the Paria Wash was an historic-use road that the BLM did not have the authority to close. Internal and external interviewees noted resource damage to riparian areas and side canyons from OHV use in the wash, but there was no consensus as to the severity of the impacts or whether OHV use would be sustainable in the long-term.

Transportation and Access	
Findings	Recommendations
<p>Transportation and access are contentious at GSENM. Access to and information about legal and illegal routes, R.S. 2477 issues, Paria Wash, off-highway vehicle use, and projects proposed on All-American Highway 12 have been the source of controversy locally, in the media, and at the national BLM level.</p> <p>The Team finds that transportation and access are catalytic issues that must be resolved collaboratively with government officials and the interested public in order for the GSENM to be able to implement other aspects of its Plan. Although R.S. 2477 issues are being litigated by Kane County, most members of the public disagreed with Kane County’s approach. Many interviewees expressed a desire to work with the BLM to resolve access issues, including the Kane County Taxpayer Association and several elected officials.</p> <p>When it was developed in 2000, the Monument Plan used the most current BLM travel management policies available at the time and provided extensive opportunities for public involvement and input. In addition, the Plan’s Record of Decision (pages viii to ix) does identify several routes that remained open to the public under the Approved Plan in response to public comments received on the Draft and Proposed Plans. BLM travel management policies have evolved significantly since the Monument Plan was developed and many external stakeholders appreciated the emphasis on public input that the adjacent Kanab Field Office made during the recent development of their Approved RMP.</p>	<p>Ensure that the future plan evaluation examines the need to comprehensively amend the travel and transportation management plan (Map 2) and considers new information about access routes as the process evolves. As determined necessary, re-evaluate future route designation decisions on a route-by-route basis. Build upon the Kanab Field Office’s travel management planning experience to improve public input and participation in the process. Provide clear explanations why specific routes are open or closed.</p> <p>Issue supplemental rules to enable enforcement of plan decisions.</p> <p>Post signs on routes in a consistent and systematic manner and distribute a detailed public use map that clearly matches the on-the-ground signage.</p> <p>Conduct employee training to improve understanding of the travel management portions of the Plan. Ensure that current information on open and closed routes and route condition is provided to GSENM staff and the public.</p> <p><i>See also Additional Findings and Recommendations – Facilities.</i></p>

Rangeland Health EIS and Vegetation Treatments

Since 2000, the Monument has been working on a Monument Management Plan Amendment and Rangeland Health Environmental Impact Statement (EIS). The Plan required that new allotment management plans be completed by July 2003. The Federal Register notice for the

Draft EIS was issued on October 10, 2008 and the comment period for the Draft EIS concluded on January 8, 2009. The GSENM is currently preparing an action plan for completing the Final EIS. The action plan will be presented to the Utah State Director by early August 2010.

The stated purpose of the EIS and Plan Amendment are to integrate decisions for livestock and rangeland management into the GSENM Plan through a plan amendment; revise GSENM Plan sections affected by rangeland management to integrate livestock grazing into existing resource management; update and amend livestock management decisions in land use plans for non-GSENM lands where GSENM has grazing management responsibility; and provide the management direction necessary to ensure that public lands are achieving or making progress towards achieving Rangeland Health Standards.

Many GSENM staff and several external interviewees raised issues about inconsistencies and conflicting direction in the Plan regarding the use of native and non-native plant species in revegetation projects and which methods should be used to conduct certain vegetation treatments. The EIS and Plan Amendment were considered by GSENM staff to be an opportunity to address these issues.

Use of Native Plants The GSENM's EIS and Plan Amendment sought to clarify the use of native and non-native plant species in revegetation projects. GSENM staff consider the existing Plan direction confusing because it is viewed as both permitting and prohibiting the use of non-native species.

There was a range of opinions expressed by GSENM staff and external partners about the use of native species. Some interviewees assert that seedings with native plants have been less successful than with non-natives. They believe that non-natives must be used in some revegetation efforts to ensure seeding success, particularly when the goal is to prevent the spread of noxious weeds. Others interviewees think the Monument needs to place more emphasis on using only native seed and that it has been using non-natives to a greater extent than is necessary. They believe that forage production benefits and lower costs often factor into the decision to use non-natives, rather than science.

Vegetation Treatments The Plan allows a variety of vegetation treatment methods to be used to restore and promote a natural range of native plant associations in the Monument. Methods and projects that which do not achieve this objective or which irreversibly impact Monument resources are not permitted. Chaining is allowed only outside of the Primitive Zone (comprising 65 percent of the Monument) and it cannot be used to remove pinyon and juniper. Chaining may be allowed under limited conditions following wildfire, as noted in Plan decision RM-2. RM-2 also requires that the Monument Advisory Committee (MAC) be consulted before the use of machinery for treatments is permitted. However, Plan Decision ADV-2 states that the MAC "could be consulted on issues such as protocols for specific projects (i.e., vegetation restoration methods...)" which has led to confusion among the GSENM staff regarding whether review by the MAC on the use of mechanical vegetation treatments is required or recommended. The MAC has not been active since 2008.

Interviewees expressed disagreement about the purpose and benefit of revegetation treatments on the Monument, with chaining being particularly controversial. The Team also found that there is

no clear understanding among GSENM staff and with external stakeholders about whether chaining to treat pinyon-juniper and other mechanized treatment methods is currently occurring and/or is being proposed for future projects. For example, concerns were raised to the WO about chaining being included as a treatment method in the GSENM's recent Upper Kanab Creek Project. However, there is no mention in the EA for the project of chaining being used as a pinyon-juniper treatment method. Some external stakeholders asserted that the EA fails to make it clear that chaining would not occur in the Monument but did not claim that it would under the proposed action. This confusion could have been avoided with a clearer description of treatment methods in the EA and a discussion of the consistency of the proposed action with Plan direction.

All vegetation treatment projects are to have monitoring plots established to determine the effectiveness of the treatments in achieving management objectives and to provide baseline data of overall change. Some internal interviewees believe that existing monitoring plots could serve the purpose rather than establishing new studies. However, they agreed that there are many areas where additional range science could be established and integrated to measure the effectiveness of vegetation treatments and impacts from livestock grazing.

Overall, the weed management program at the Monument received positive comments.

Rangeland Health EIS and Vegetation Treatments	
Findings	Recommendations
<p>Several on-going and proposed vegetation management projects involving chaining and bullhogging and use of non-native seed have been controversial. Many GSENM employees questioned the objectives of these projects and feel that they were being implemented without a full scientific assessment. The Monument Advisory Committee has not been active since 2008, so the Monument cannot meet the Plan requirement to consult with them when proposing to use mechanical treatment methods.</p> <p>There was wide agreement that clarification is needed for the Plan direction concerning the use of native plants. There was disagreement about the success rate when only native plants are used for revegetation projects and the need to use non-native seeds.</p>	<p>The GSENM is preparing an action plan for completing the EIS and plan amendments. The action plan will be presented to the Utah State Director by early August 2010. The Action Plan should address the need to clarify and/or amend direction on the use of non-native plants. It should also address whether more direction is needed to guide vegetation management treatment methods, or if more adaptive management, scientific study and monitoring are needed. Before finalizing, the GSENM must submit the action plan and schedule to the WO for review.</p> <p>Ensure that NEPA documents evaluate proposed actions for their impacts to Monument objects, identify the applicable Plan standards, and clearly describe how the objects will be protected.</p>

Grazing Administration

There are 82 separate grazing allotments within the GSENM. According to the Draft Rangeland Health EIS issued in 2008 about 21% of the allotments have a downward trend, 35% have a static trend, and 35% have an upward trend. Nine allotments, or about 19% of the GSENM, were found to not meet one or more Rangeland Health Standards due to existing livestock grazing. The Draft EIS determined that existing livestock management needed to be changed on

the nine allotments in order for them to meet Standards in the future. Since the Draft EIS was issued, according to GSENM staff three more allotments are now meeting Standards, leaving only six that do not.

Several internal and external interviewees stated that unauthorized use and lack of range improvement maintenance (especially fences) were ongoing issues. Some interviewees believe that the BLM has been reluctant to issue trespass notices when unauthorized use is occurring. Gates being left open by recreationists has caused problems at times for some permittees. The Team was not able to determine why assigned maintenance of fences and other range improvements has not been occurring, and how widespread of an issue it is for the GSENM.

GSENM staff are more supportive of livestock grazing as a multiple use than in the first 4 to 5 years when the Monument was established. However, there are still divergent views between range staff and other staff specialists on the role and impact of livestock on the Monument.

The Glen Canyon National Recreation Area (GCNRA) is administered by the National Park Service (NPS) and borders the GSENM to the east and southeast. The legislation creating the GCNRA authorized livestock grazing within the Recreation Area. This law provides that grazing permits will be administered by the BLM following the same regulations and policies as on the adjacent lands under BLM jurisdiction, subject to the requirement that the area be managed in accordance with the NPS Organic Act. The Directors of the NPS and BLM signed a Memorandum of Understanding (MOU) in September 1984 requiring the BLM to “consult and cooperate with” the NPS in grazing administration on GCNRA. The process of consultation on grazing administration, and incorporation of GCNRA values and purposes into that consultation is outlined in an interagency agreement between the BLM’s Utah State Director and the Superintendent of GCNRA.

Several internal and external interviewees noted that the Monument’s relationship with the GCNRA has improved. Overall, each agency is increasing its understanding and respect for the other’s respective mission. However, interpretation of the interagency MOU is still quite different between the agencies. During interviews, NPS staff expressed concerns that there was not enough protection of GCNRA natural and cultural resources from livestock grazing. Resource conflicts are considered differently on NPS lands because NPS lands have a “non-impairment” standard. To address some of these concerns, the Monument will be entering into an agreement with NPS regarding protective actions for cultural resources from grazing. There are also differences of opinion regarding responsibility for grazing administration on GCNRA lands, including how to interpret Land Health Standard ratings as met or failed. The NRA staff would like to see more regular coordination regarding grazing issues. They would also like to create an association for those permittees working across agency lands to increase educational efforts. However, both agencies are limited by their capacity to begin additional projects along with day-to-day duties.

Grazing Administration	
Findings	Recommendations
<p>Unauthorized use and range improvement maintenance need more attention from GSENM managers.</p> <p>GSENM range staff have good working relationships with permittees. However, interested permittees and other stakeholders are not being provided the opportunity to be involved in cooperative monitoring.</p> <p>The BLM's role in the administration of Glen Canyon NRA allotments needs further dialogue and clarification.</p> <p>There is concern from permittees and some externals that GSENM management is listening too much to the Partners group and anti-grazing environmental organizations.</p>	<p>GSENM Managers should examine and appropriately address issues raised about unauthorized use and the lack of range improvement maintenance, particularly fences. When it is re-activated, use the Monument Advisory Committee as a forum to help address and reach consensus among stakeholders on these issues.</p> <p>Encourage cooperative monitoring by permittees and interested stakeholders.</p> <p>As appropriate, use the Rangeland Health EIS or environmental assessments to clarify livestock grazing administration responsibilities and rangeland health objectives for the Glen Canyon NRA. Review and update, if needed, the MOU between the BLM and the Glen Canyon NRA. Step up coordination with the NPS to resolve grazing trespass issues.</p> <p>Use the Monument's science focus as an opportunity to create an "outdoor laboratory" to demonstrate grazing management approaches and vegetation treatments that are the most effective for both livestock and healthy landscapes.</p> <p>Ensure fair consideration of all interests and positions of the Partners group, permittees, environmental groups and all other interested publics.</p>

Current Management, Public Relations, and Partnerships

Overall, current management is working to improve internal and external communication to more effectively accomplish work and achieve Plan decisions while also improving relations with the public. Internally, the current Monument Manager has initiated committees of staff members to report on current and pressing issues. Externally, the GSENM Planning and Science Division Chief and science staff work closely with partners and community members to create opportunities for science, outreach, and restoration. Most interviewees praised the Monument Manager for his efforts to engage them and make improvements at the GSENM. However, most people interviewed still cite communication and coordination as a major hindrance to implementation of the Plan and to positive, productive public relations. Most cited good public relations and an improving situation due to the efforts of a few managers and staff, notably, the Monument Manager and the Planning and Science Division Chief. Some interviewees believe that the desire for improved relationships with the local communities makes it more difficult to implement the more controversial aspects of the Plan.

The Team generally found increasing external acceptance of the Monument's existence and a strong desire by interested members of the public, including elected officials (with the partial

exception of Kane County Commissioners) to engage with the BLM to solve problems for mutual benefit. The Team heard the phrase “it’s time to come back to the table” numerous times. Many members of the public stated that they were angry when the Monument was originally designated, but that they now see it as a source of sustainable economic and cultural opportunity. However, others expressed the opinion that the only economic activity in which they have interest revolves around resource extraction such as coal mining or grazing, as opposed to tourism and science-based economic opportunities.

The Grand Staircase-Escalante Partners (GSEP) is a non-profit group whose stated purpose is to generate public support for the Monument and conservation of its resources. It assists with a variety of interpretive, educational, scientific, and research programs and is working closely with the Monument on science infrastructure, education, and other projects, especially in the Escalante area. While in many ways the partnership has been a highlight, many interviewees, especially those associated with GSEP, expressed frustration that the Monument was relying on GSEP to provide the Monument’s science and education infrastructure. These interviewees stated that while GSEP could properly play a support role, the Monument needed to rehire full-time staff in the fields of science and education.

Visitor Centers were noted as hallmarks of good community relations. Visitor Center staffs have worked with local schools and the public to host interpretive programs, lecture series, and guest speakers on a variety of topics. The “Walks and Talks” given by Monument staff are well received.

Cooperation and Consultation		
Topic	Findings	Recommendations
Cooperation with Communities, State, and Federal Agencies	Cooperation with certain agencies has been positive, and others negative. The National Park Service, the Forest Service, Utah Department of Transportation, and several elected officials reported improved and improving relations because of the efforts of current management and certain staff members. Kane County Commissioners continue to be adversarial over RS-2477, road access, and resource extraction issues. Garfield County officials stated their desire to return to the table, as did all local mayors interviewed. The Team found that the time is ripe for furthering the GSENM’s engagement with local communities.	<p>Continue attending local officials’ meeting and get the GSENM on their agendas.</p> <p>Continue ongoing efforts to engage and educate the public about the GSENM.</p> <p>Develop an outreach plan to improve the GSENM’s relationships with local governments.</p>
Consultation with Native American Tribes	The Team did not address consultation with Native American tribes. Staff reports that they conduct consultation activities when required, and that relationships with local tribes are positive to indifferent. No additional tribal issues were reported.	<p>Continue to fulfill BLM’s legal and ethical obligations with respect to tribal consultation.</p> <p>Explore additional ways to engage tribes.</p>

<p>Monument Advisory Committee</p>	<p>The Plan requires the establishment and ongoing engagement of a Monument Advisory Committee (MAC). The Team found that the MAC has not been in existence since 2008 and that when it did exist, it did not function effectively. Members of the public and GSENM staff expressed a strong desire to re-charter and use the MAC.</p>	<p>Re-charter the MAC and submit nominations for membership.</p> <p>Conduct regular meetings.</p> <p>Consider the use of MAC subcommittees to do task-oriented work that cannot be accomplished by the full committee.</p> <p>Include MAC maintenance functions (re-chartering, nominations, Federal Register notices, etc.) in the EPAPs of the appropriate employees.</p>
<p>Website</p>	<p>The lack of maintenance on the Monument website was identified by internal staff as a major impediment to public outreach. Field staff requested website updates in 2010 regarding snow conditions on the Monument. These updates were never made and resulted in visitors traveling to the area and not being able to recreate. The Monument currently has a 2008 Walks & Talks schedule posted on its website.</p>	<p>Update the website and develop a website management strategy to ensure that content is refreshed in a timely and consistent manner.</p> <p>Explore how partners can help provide regularly updated web content.</p>
<p>Community Outreach</p>	<p>Local citizens frequently question why the Monument should be protected and why preservation is important. Ongoing field trips to fossil excavation sites are a positive step towards educating the public, but local communities would like to see more outreach.</p> <p>Some local residents requested that the Monument maintain a publicly available list of all chemicals/pesticides/herbicides being used at any given time.</p> <p>The GSENM should provide more information and opportunities for dialogue with tourism providers regarding Monument regulations and the unique objects and values they are intended to protect. Tourism operators provide an opportunity to outreach to additional visitors.</p> <p>Some interviewees raised concerns that scientific discoveries on the GSENM, especially fossils, are not available to the local community. Because the BLM is not a repository agency, it enters into agreements with museums, universities, and other similar institutions to house collections and ensure that scientific discoveries made on public lands are</p>	<p>Highlighting the pioneer history of the Monument through interpretative and volunteer projects was identified numerous times a key way to involve local community residents.</p> <p>Emphasize continued outreach to schools and pursue opportunities to employ local youth.</p> <p>Develop an interpretation and visitor services plan.</p> <p>Consider partnering with other land management agencies to educate tourism providers in the various land management regulations. This information would then be passed onto their clients who recreate on the public lands.</p> <p>Continue to work on joint science and management projects for the benefit of Monument objects and local communities, such as the Escalante Watershed Project and All-American Highway 12 projects.</p> <p>Collaborate with the Partners and</p>

	documented and stored using established scientific methodologies.	other stakeholders on ways to locally curate, display and interpret selected GSENM collections.
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Additional Findings and Recommendations

Plan Decision	Finding	Recommendation
Management of Resources		
Air Quality	The team did not address this Plan decision.	
Archaeology	Interviewees generally stated that the Monument has moved away from archaeology, among other sciences, as a priority over time.	Re-examine the Monument’s Table of Organization and shift resources back into the sciences, as per the Monument’s Proclamation. See also <i>Major Findings and Recommendations – Science</i> , above.
Fish and Wildlife	<p>Several GSENM staff recommended that the Plan be updated to better address habitat for the Monument’s threatened, endangered and sensitive wildlife species by incorporating updated policy guidance and new information. Species include:</p> <ul style="list-style-type: none"> • Peregrine falcon. • Bald eagle. • Sage grouse (no actions in the Plan; new planning decisions could be developed to assist habitat management). • Yellow-billed cuckoo (was not addressed in the Plan). • USFWS now has Recovery Plans established for the Mexican spotted owl and the southwestern willow flycatcher. Current recovery actions are not addressed in the Plan. Regular inventories have been completed for these species and data would assist any future planning efforts. • Kanab ambersnail addressed in MMP as T&E. Subsequent research has shown that it is not genetically distinct and it could be de-listed. <p>Plan decision WS-2 states “No traps, poisons, snares, or M44s will be allowed in the Monument due to safety concerns and potential conflicts with Monument resources.” The Plan also states that, consistent with the Proclamation, the responsibility and authority of the State of Utah for management of fish and wildlife is not diminished. An issue was raised by an interviewee about bobcat trapping occurring on the Monument.</p>	<p>Use the future plan evaluation to address the need to clarify and/or amend direction for wildlife habitat management.</p> <p>Appropriate Monument staff should meet with the Utah Division of Wildlife Resources to assess the bobcat trapping situation and respond accordingly.</p>
Geology	The team did not address this Plan decision.	
History	The team did not address this Plan decision.	
Paleontology	Paleontology is one of the highlights of Plan implementation and of GSENM’s accomplishments in general. Interviewees universally pointed out paleontology as a highlight of what is working well at	Support and expand the GSENM’s innovative and world-class paleontology program as part of the Monument’s science plan.

Plan Decision	Finding	Recommendation
	GSENM. Discoveries and research in the past ten years are re-defining what we know about the age of the dinosaurs. The program manager is well-regarded and is cited as the reason for the program's achievements.	
Riparian	<p>Riparian conditions have been improving on the GSENM. The Monument's Escalante Watershed project is being implemented with the goal of eradicating invasive Russian Olive and tamarisk.</p> <p>There are still incidents of unauthorized livestock use which cause resource damage and user conflicts.</p>	<p>Support riparian restoration projects, including removal of invasive plant species.</p> <p>Support riparian partnerships.</p> <p>Support the development and use of best available science to implement projects in riparian areas, including with respect to grazing decisions.</p> <p><i>See also Major Findings and Recommendations – Grazing Administration.</i></p>
Soils and Biological Soil Crusts	Several interviewees expressed concerns about the lack of research and staff doing work on biological soil crusts, stating that this is necessary to promote sustainable soil health and biodiversity. Some also feel that management actions and allowed uses often disregard soil crust health.	Address soils and biological soil crusts in the GSENM science plan. Pursue and leverage additional funding, research, and grants where possible to expand scientific understanding and protection. Increase GSENM staff awareness of Plan requirements and management options for protection of biological soil crusts.
Vegetation	<i>See Major Findings and Recommendations – Rangeland Health EIS and Vegetation Treatments</i>	
Water	The team did not address this Plan decision.	
Management of Visitors and Other Uses		
Camping	Except within "designated primitive camping areas," MMP decision CAMP-1 does not allow primitive camping in Frontcountry & Passage Zones. A majority of primitive camping currently occurs in these two zones. Annual monitoring since 1997 has determined that resource degradation is not occurring at primitive campsites. Two efforts to designate primitive camping areas in Frontcountry & Passage Zones were never completed.	The GSENM should analyze the monitoring data and address this issue in the upcoming Plan evaluation.
Climbing	The team did not address this Plan decision.	
Collections	The team did not address this Plan decision.	
Commercial Filming	The team did not address this Plan decision.	
Competitive and Special Events	The Plan prohibits competitive events. The decision ended a historic horseback riding event that brought in tourism to the local communities. There is the potential for the GSENM to host low-impact competitive events, such a 5K run.	The GSENM should assess the demand and need for competitive events in light of protection to the monument's objects and values and consider this information during the Plan evaluation.
Emergency and Management Exceptions	The team did not address this Plan decision.	
Facilities	Numerous external interviewees and a few internal interviewees mentioned that the lack of trailhead information at popular recreational access points was an issue and/or a "nightmare." They identified a need for information to be provided in numerous languages	The Monument should prioritize the development of trailhead information at heavily used access points to educate visitors regarding outdoor ethics and safety hazards. The Monument should install new kiosks at several

Plan Decision	Finding	Recommendation
	<p>due to the international visitation to the Monument, the need to identify potential conflicts with cattle on multiple-use lands, and the various use limitations associated with different Monument zones and WSAs.</p> <p>OHV user groups in Kanab expressed their frustration at working with the Monument over the past year and not being able to volunteer their time, equipment, and labor to install one trailhead kiosk when they were able to install two trailhead kiosks on the Kanab Field Office in the same timeframe.</p>	<p>sites in order to provide a 24-7 presence with critical visitor information.</p>
Fees	<p>The Plan states that the Monument had been approved to develop a fee demonstration program. The team did not address this Plan decision.</p>	<p>Although not a part of this review, the Team recommends that the GSENM assess the feasibility of a fee program in its business planning. The Monument should work closely with the MAC and the WO to explore its available options.</p>
Fences	<i>See Major Findings and Recommendations – Grazing Administration.</i>	
Group Size	The team did not address this Plan decision.	
Livestock Grazing	<i>See Major Findings and Recommendations – Grazing Administration.</i>	
Night Skies	The Team did not address this Plan decision.	
Outfitter and Guide Operations	<p>Special Recreation Permit holders who provide outfitter and guiding services on the Monument repeatedly expressed their satisfaction about working with Monument staff during the permitting process.</p> <p>Some permitted guided activities are experiencing increased pressure from visitor use. Canyoneering is a prime example because only so many people can fit into a slot canyon at one time.</p> <p>Several permitted outfitter and guide operations expressed frustration regarding the travel plan. Permit holders are only authorized to conduct business on routes designated in the MMP travel plan and this limits the number of destinations businesses can take clients. In addition, because there are no signs and little enforcement, the general public uses all routes in the Monument including routes that are supposed to be closed. This causes an issue for outfitters and guides because they tell their clients that driving on certain routes to desired destinations is prohibited but the clients see that it still occurs.</p>	<p>The Monument should increase efforts to coordinate with its permitted guides and outfitters regarding Monument resources, regulations, and research. Use guides to help to explain GSENM rules, resource values, and the scientific importance of discoveries.</p> <p>Explore ways to increase coordination among permitted guides and scientific researchers. Guides could be hired by researchers to establish base/drop camps by horseback in WSAs and/or for hauling out plants/discoveries.</p> <p>Use monitoring data and the Plan evaluation process to determine whether limits should be established on the number of permits/guides for some activities.</p>
Recreation Allocations	The team did not address this Plan decision.	
Recreational Stock Use	The team did not address this Plan decision.	
Science and Research	<i>See Major Findings and Recommendations – Science.</i>	
Transportation and Access	<i>See Major Findings and Recommendations – Travel and Transportation Management.</i>	
Trespass - Occupancy	<p>Interviewees complained that staff are not taking action on occupancy trespass (case of a house built on public land).</p>	<p>Investigate the occupancy (home) trespass case and resolve as necessary</p>

Utility Rights of Way and Communication Sites	The proposed right-of-way for the Tropic to Hatch transmission corridor would amend the Plan to widen an existing corridor and change management from “Primitive” to “Passage.” The proposal is consistent with the Proclamation and a reasonable action to consider implementing.	Ensure that all ROWs conform to the Proclamation and other applicable laws and policies, such as those that relate to Wilderness Study Areas. Where possible, work with adjacent land management agencies to site ROWs outside GSENM’s boundaries.
Valid Existing Rights and Other Existing Authorizations	The team did not address this Plan decision.	Continue using best management practices, including Visual Resources Management, to honor valid existing rights while protecting Monument objects.
Vending	The team did not address this Plan decision.	
Water-Related Developments	The team did not address this Plan decision.	
Wildfire Management	The team did not address this Plan decision.	
Wildlife Services	The team did not address this Plan decision.	
Withdrawal Review	The team did not address this Plan decision.	
Special Emphasis Areas		
ACECs	The team did not address this Plan decision.	
Special Management Designations	The team did not address this Plan decision.	
Special Recreation Management Areas	Internal staff stated that the seven SRMA boundaries established in the Plan “still make sense.” The Plan calls for developing management plans for each SRMA. To date none have been completed. Recreation staff’s priorities are day-to-day duties such as monitoring, route restoration, facility maintenance, permit processing, etc. and have not had the latitude to prioritize the development of SRMA plans.	Consider prioritizing the development of SRMA plans, which would benefit resources, recreational opportunities, and visitor services and develop a schedule for completing these plans.
Visual Resource Management (VRM)	The Plan designated portions of the Monument as either VRM Class II (68%) or Class III (32%). Some staff reported that VRM issues are not fully considered when decisions are made and management actions implemented. These staff reported that the input of qualified VRM specialists would ensure better decision-making and management actions.	All proposed actions must consider the importance of visual values and minimize the impacts may have on these values. Ensure that appropriate staff (i.e., landscape architect, land use planner, and outdoor recreation planner) are involved in decisions and management actions that affect visual resources.
Wild and Scenic Rivers	The team did not address this Plan decision.	
Wilderness Study Areas	The Team found that wilderness study areas are rarely treated differently than non-WSAs at GSENM. The Team could not determine if this was because WSAs comprise so much of GSENM (nearly 50%) that WSA-management has become a standard operating procedure or because WSA policies are simply ignored. Another potential reason is that management prescriptions within the Monument’s Primitive Zones (65% of Monument) also require additional non-impairment-like standards. Conversations with management seemed to indicate WSA management does occur and conversations with certain members of the public indicated that insufficient WSA management considerations are taking place.	Increase GSENM staff awareness of WSA policy and management. Conduct training as necessary. Ensure protection of WSAs is fully addressed in NEPA documents and project planning.

	There is an on-going issue regarding the Dryfork Trailhead in a WSA. In conformance with the non-impairment standard it cannot be developed; however, it is a popular recreation site and rampant human waste is causing public health concerns. Backcountry rangers must have hepatitis vaccinations in order to spend a large amount of time cleaning the trailhead.	Address the environmental and public health issues at Dryfork Trailhead. Consider re-locating the trailhead outside of the WSA where facility development can be accommodated.
Cooperation and Consultation		
Cooperation with Communities, State, and Federal Agencies	<i>See Major Findings and Recommendations - Current Management, Public Relations, and Partnerships.</i>	
Consultation with Native American Tribes	<i>See Major Findings and Recommendations - Current Management, Public Relations, and Partnerships.</i>	
Monument Advisory Committee	<i>See Major Findings and Recommendations - Current Management, Public Relations, and Partnerships.</i>	
Website	<i>See Major Findings and Recommendations - Current Management, Public Relations, and Partnership.</i>	
Community Outreach	<i>See Major Findings and Recommendations - Current Management, Public Relations, and Partnerships.</i>	

How was the Review Team able to arrive at its conclusions?

- Off-site objective document review and on-site interviews of almost 100 people (internal and external).
- The benefit of a Review Team with diverse experience and expertise.
- The benefit of hindsight.
- Discursive interactions between the Review Team and GSENM staff.
- Time and attention dedicated to the single task of reviewing plan implementation.
- Separation from historical, cultural, and institutional issues, preconceptions, and biases.
- The opportunity to synthesize historical data with current technology and processes.

What does this mean for future land use plan implementation at GSENM?

The Monument should renew its efforts to implement all aspects of the Plan, complete a formal Plan evaluation, and complete needed plan amendments or revisions. GSENM management and staff have a responsibility to be familiar with the Plan, to use the Plan to determine management actions and establish priorities, and to conserve, protect, and restore the objects for which GSENM was designated. The BLM should use this opportunity to re-engage with the interested public, focus management around the shared value of science, and take advantage of the world-class resources offered by the Monument for the benefit of the objects for which the GSENM was designated and the people with a vested interest in its management.