



# United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
SOUTHWEST DISTRICT OFFICE  
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**In Reply Refer To:  
1782 (CO-S00)**

June 5, 2018

Scott Armentrout, Forest Supervisor  
U.S.D.A. Forest Service  
2250 South Main Street  
Delta, Colorado 81416

Dear Mr. Armentrout,

The U.S. Department of the Interior Bureau of Land Management (BLM) appreciates the opportunity to participate as a cooperating agency in assisting the U.S. Department of Agriculture Forest Service (Forest Service) as it revises the Forest Plan and associated Environmental Impact Statement (EIS) for the Grand Mesa, Uncompahgre, and Gunnison (GMUG) national forests.

The Forest Service intends to revise the Forest Plan and associated EIS in accordance with the National Forest Management Act of 1976 and the 2012 Land Management Planning Rule (36 CFR 219), pursuant to NEPA. The BLM recognizes its responsibility to participate as a cooperating agency under 40 CFR 1501.6, as the agency has special expertise to contribute to this process.

### **Coordination on Common Resources and Resource Uses**

All three of the BLM districts within Colorado share common boundaries with the GMUG, along with many of the same resources, uses, and management issues and concerns. The BLM values establishing and maintaining strong relationships across agency boundaries and looks forward to contributing to an efficient process and effective outcome.

The BLM supports that the EIS include a hard-look analysis of all impact types (direct, indirect, and cumulative). In addition, the EIS should disclose potential impacts to resources for reasonably foreseeable actions to allow for decision makers and relevant agencies and organizations to adequately plan for minimization of such impacts.

### **Livestock Grazing**

The BLM requests that the Forest Service coordinate closely with the BLM when formulating direction pertaining to rangeland management (including allotment rotation and closures) to ensure the long-term health of neighboring allotments. As the release of their draft sheep grazing EIS nears, the BLM Gunnison Field Office has a special interest in such coordination.

## **Mineral Resources and Leasing Decisions**

While the Revised Forest Plan will identify lands unsuitable for coal mining (per 43 CFR §3461.5) and a separate NEPA effort tiering to the Revised Forest Plan will be conducted to analyze fluid mineral leasing, the BLM encourages the Forest Service to effectively set the stage for future mineral decisions in the Forest Plan. Air quality analysis should ensure that decision makers have adequate information to guide future leasing decisions and identify appropriate proactive measures to minimize adverse impacts to air quality.

## **Water Resources**

The BLM believes that water resources should be afforded a high level of consideration. This is especially true for wetlands and riparian areas within wilderness study areas, areas of critical environmental concern, and areas under consideration for National Wild and Scenic River designation. While the BLM recognizes the challenges in analyzing, understanding, and ultimately managing water resources across such a large plan area, the Forest Plan/EIS should specify how water resources would be identified, avoided, or ultimately mitigated to aid in continuity of resource management of adjacent BLM lands.

## **Sharing of Information and Data**

The BLM agrees to share internally generated information and data sets (including GIS data) requested by the Forest Service during the plan revision process, provided that the data is not determined to be sensitive or predecisional. The BLM strongly encourages the Forest Service to provide maps identifying locations and boundaries related to GMUG resources and potential management alternatives whenever possible during the process in order to maximize public understanding.

The BLM appreciates the opportunity to provide an initial response during scoping for the Forest Plan, and we look forward to working with the Forest Service throughout this significant effort. For greater efficiency, the three BLM Colorado districts will consolidate their input through the Southwest District office. If we can be of further assistance at this time, please contact Southwest District Planner D. Maggie Magee at (970) 240-5323 (dmagee@blm.gov) or me at (970) 240-5315 (sconnolly@blm.gov).



Stephanie Connolly  
District Manager

cc: Andrew Archuleta, District Manager, BLM Colorado Northwest District  
Catherine Cook, District Manager, BLM Colorado Rocky Mountain District  
Megan Gilbert, Branch Chief for Planning, BLM Colorado State Office