



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Denver Federal Center, Building 53
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Denver, Colorado 80225-0007

ER21/0036

November 23, 2021

Chad Stewart, Forest Supervisor
2250 South Main Street
Delta, Colorado 81416

Subject: Comments on Draft Environmental Impact Statement, U.S. Department of Agriculture, Forest Service, Draft Revised Land Management Plan, Grand Mesa, Uncompahgre, and Gunnison National Forests

Dear Mr. Stewart,

The U.S. Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for the Draft Revised Land Management Plan, Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) in Colorado. The U.S. Forest Service (USFS) proposes to revise the forest plan for the GMUG. The area affected by the proposal includes approximately 2.9 million acres of National Forest System land in southwestern Colorado.

The Department offers the following comments, submitted by the Bureau of Land Management's (BLM) Colorado State Office.

BLM CO State Office Comments

In the section *Air Resources* of chapter 3, CARMMS 2.5 source apportionment impacts specifically for GMUG projected oil and gas emissions (on USFS land only) would work better than source apportionment impacts for the Grand Junction Field Office (GJFO) and Uncompahgre Field Office (UFO) that includes non-USFS oil and gas emissions. However, they are unclear whether this means these are the cumulative concentrations within these areas or source apportionment/impact contributions to cumulative levels that could be associated with new Federal oil and gas developed/operating within these Field Offices.

We also note that last sentence on page 231 references Table 116 and implies that these are source apportionment impacts for UFO and GJFO but appear to be cumulative impacts. It doesn't appear clear to us whether these are CARMMS 2.0 predicted cumulative (all sources -

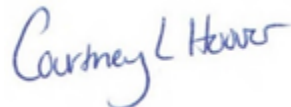
not just those associated with UFO and GJFO) impacts for grid cells that intersect the UFO and GJFO. It is also unclear to us if these were determined zooming into the modeled concentration plot figures.

Additionally, within the *Air Resources* section, we recommend disclosing potential greenhouse gas emissions (upstream, midstream, and downstream) associated with oil and gas over the life of the Plan. As part of CARMMS 2.5, upstream and midstream emissions were calculated for new potential GMUG oil and gas development and operations through 2025 (technical memo with these emissions is available). We recommend using these 10-year (2016-2025) rates to develop life of Plan upstream and midstream emissions, and then supplementing these upstream and midstream emissions with life of Plan downstream emissions estimates and comparing the total (upstream, midstream, and downstream) estimate to other larger-scale levels (UFO, GJFO, Colorado, U.S.) for same approximate time period (life of Plan). We also recommend considering a comparison of these life of Plan emissions to the amount “normally” sequestered by GMUG forests/vegetation.

We thank you for the opportunity to comment on this document. If you have any questions regarding these comments, please contact Roger Sayre of the BLM Colorado State Office at RSayre@blm.gov or (303) 239-3709.

If you have any questions for the Department, please contact me at (303) 478-3373, or courtney_hoover@ios.doi.gov.

Sincerely,

A handwritten signature in blue ink that reads "Courtney Hoover". The signature is written in a cursive, slightly slanted style.

Courtney Hoover
Regional Environmental Officer
Office of Environmental Policy and Compliance