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Organization: BLM

Title:

Comments: BLM Colorado Review of GMUG Preliminary

Hello Samantha and Shane,

Attached are BLM Colorado's comments on the Preliminary Draft Revised Land Management Plan for the Grand Mesa, Uncompahgre, and Gunnison National Forests. The BLM appreciates this opportunity to comment on the Preliminary Plan and looks forward to continued interaction and input as you proceed with this process.

Please let me know if you have additional questions or would like clarification on any of the comments.

Roger Sayre

Planning and Environmental Coordinator

BLM Colorado State Office

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Cmt #	Page #	Reviewer Name	Reviewer Office/ Affiliation	Comment	Response / How Resolved
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(Reviewers: Leave this column blank)

1.	65	A. Stillings			
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Socioecon	BLM COSO	Citing IMPLAN as the data source for economic activity seems odd with the way this is written up and isn't a data source that public can verify			
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2.	66	A. Stillings			
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Socioecon	BLM				
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COSO	Remove space in crowding in second row				
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3.	67	A. Stillings			
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Socioecon	BLM				
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COSO	Do we want to any economic sector tracking at the county level (e.g., forestry, grazing, tourism) via Headwaters Economic Profile System to provide context? Appears to be on decade scale;				
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4.	97	A. Stillings			
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Socioecon	BLM COSO	Add to IMPLAN definition that it's an economic model [ndash] it's not social			
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5. 10 F. Cook

Air Qual BLM

COSO for the air quality related "Guidelines" for meeting the standards on page 10...for FW-GDL-AQ-11, I would probably revise to read: "should not result in critical load exceedances and contribute significantly to visibility impairment in Class I and sensitive Class II areas, and contribute significantly (above project-level significant impact levels, etc.) to cumulative air quality concentrations at or near ambient air quality standard levels for proposed projects on Forest lands"...

6. 10 F. Cook

Air Qual BLM

COSO I also would probably add a new Guideline: FW-GDL-AQ-13 that reads something like: "for oil and gas projects on Forest land, work with the BLM Colorado including the use of BLM's online applications and tools to develop project-specific air pollutant emissions inventories and complete NEPA assessments..."

7. F. Cook

Air Qual BLM COSO This preliminary draft includes a general reference to the 2018 air quality analysis that GMUG prepared (i.e., Grand Mesa, Uncompahgre, and Gunnison National Forests REVISED DRAFT Forest Assessments: Air Quality March 2018)

that 2018 air quality analysis utilized CARMMS 2.0 but did not use CARMMS 2.5 which was a modeling effort completed just for the Forest Service...the GMUG Plan DEIS should use the CARMMS 2.5 products as they highlight GMUG's projected future oil and gas potential impacts to air quality and related values.

8. Chapter 1 D. Maggie Magee

Planning and NEPA

BLM CO SWD Chapter 1: Introduction

In general, I observed the following during my review of Chapter 1:

I anticipated encountering many of the issues common in the early phases of plan development:

Excessive and circular language, repetition, lack of clarity and organization (resulting in a need to reread explanations or entire paragraphs to ascertain intended meanings), and unsupported or poorly supported directives.

I was therefore somewhat surprised to find that the preliminary Draft already contains the foundational

groundwork necessary for an excellent plan. My sense is that the GMUG has strong writers and specialists on staff, has decent examples from which to draw, and makes effective use of boilerplate language when appropriate.

- The language in the Draft Plan is succinct, clear, and highly readable. I found few instances in which language is either passive or not straightforward.

- Source materials, plans, policies, and guidance are appropriately cited.

9. pp. 9 [ndash]

45

D. Maggie Magee

Planning and NEPA BLM CO SWD The Desired Conditions, Objectives, Standards, and Guidelines provide an excellent framework for structuring management direction in a way that is clear and logical for the reader and would seem to benefit those developing the plan in better refining the Objectives, Standards, and Guidelines to meet the Desired Conditions.

10. pp. 9 [ndash]

45 D. Maggie Magee

Planning and NEPA

BLM CO SWD Wording of Objectives

For the most part, the draft Objectives are well written, although some are worded as actions, while others are more correctly worded as outcomes. And while all the Objectives include timeframes, not all include the quantifiable measures (i.e. percentage of, all of, acres of) that provide a solid path forward.

Following are example Objectives from the Draft Plan that lack a measure [with examples of clarifying language]:

FW-OBJ-CHR-136: Within 5 years of plan approval, [all] areas of Tribal importance, including discrete cultural landscapes, are spatially identified based on cultural affiliation, time period, and/or relationship with natural resources and features.

FW-OBJ-CHR-137: Within 5 years of plan approval, [90% of] fire-sensitive cultural resource (e.g., historic structures, wickiups, and culturally modified trees) locations are identified in Heritage GIS in order to facilitate protective measures during wildland fire management.

Following are examples of Draft Plan Objectives that are action-, rather than outcome-, oriented, along with suggested rewording:

Current Wording:

FW-OBJ-TEV-25: Within 10 years of plan approval, enhance the resiliency of alpine ecosystems on 100 acres of GMUG lands through implementing recreation management plans, completing mine land reclamation, or conducting other management activities.

Suggested Rewording:

FW-OBJ-TEV-25: Within 10 years of plan approval, the resiliency of alpine ecosystems is enhanced on 100 acres of GMUG lands through the implementation of recreation management plans, completion of mine land reclamation, or other management activities.

Current Wording:

FW-OBJ-DTRL-145: Within 10 years of plan approval, relocate the Continental Divide National Scenic Trail off of roads.

Suggested Rewording:

FW-OBJ-DTRL-145: Within 10 years of plan approval, [specify length or percentage of] the Continental Divide National Scenic Trail [within the GMUG] is relocated off of roads.

Current Wording:

FW-OBJ-RNA-265: Within 3 years of plan approval, complete establishment reports for recommended research natural areas.

Suggested Rewording:

FW-OBJ-RNA-265: Within 3 years of plan approval, establishment reports are completed for [percentage of] recommended research natural areas.

11. p. 60 D. Maggie Magee Planning and NEPA

BLM CO SWD Chapter 4: Monitoring

Terms/jargon are explained well and related to the bigger picture so as not to detract from understanding.

Example: The explanation of how adaptive management informs and is integral to forest plan monitoring is exceptionally clear and concise. I have seen the two concepts presented separately when they should be inextricably linked.

12. R. Sayre

Planning and NEPA BLM COSO The BLM appreciates this opportunity to participate in this review of the Preliminary Draft Revised RMP for the Grand Mesa, Uncompahgre, and Gunnison N National Forests. This draft was well-prepared and followed a logical format. We look forward to participating in further review of this document and to working with the U.S. Forest Service with this planning effort.

13. R. Sayre BLM COSO As the primary federal land management agencies in the region, with management responsibilities for most of the land in the southern and western part of Colorado, there should be many opportunities for the USFS and BLM to work collaboratively and cooperatively, particularly in relation to considering connected actions or evaluation of cumulative effects.

14. 6-7 R. Sayre

Planning and NEPA BLM COSO The preliminary draft plan focused on actions on USFS lands, but

could also address the important interagency opportunities for conservation and management, such as improving or maintaining connectivity corridors, threatened or endangered species management, watersheds and ecosystem management, or managing invasive species in areas where agency boundaries are adjacent or intersect. This planning effort will be an excellent opportunity for both agencies to work collaboratively toward similar goals. Something along these lines could be added to the final bullets of Commodity Use and Community Connections in Chapter 1.