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First name: Mike

Last name: Lane

Organization: Delta County Board of Commissioners

Title:

Comments: [ATTACHMENT COPIED BELOW]

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement

("Draft EIS") for the Grand Mesa, Uncompahgre and Gunnison National Forests ("GMUG"). The Delta County Board of County Commissioners ("Delta County") appreciates the cooperative and collaborative relationship between Delta County and the US Forest Service ("USFS") pursuant to Memorandum of Understanding ("MOU") 18-MU-11020402-017.

#### Introduction

Since the draft Forest Plan ("Plan") revision was unveiled in 2019, there have been significant changes in the foundational elements of the environment in which the GMUG operates. Major climatic impactors have asserted themselves across the West. Prolonged and continuing drought and megafires have challenged existing management and operation of human and natural environments. Finally, a pandemic changed user patterns on the GMUG, bringing unprecedented recreational pressure and requiring new management considerations by the forest administration. These overarching forces necessitate modification to the traditional forest management plan structure envisioned in 2017. The changes in our local social and natural environment have also necessitated modification of some of the County's previous comments.

Temperatures are increasing in the region, however Delta County urges the GMUG to not rush to have plans be so carbon focused that other management is diminished and often dismissed. Carbon sequestration is important however it is not the only climatic influencer for the GMUG. Specifically, watershed health must continue to be a priority and include all areas of management not just the potential impact on wildlife. Watershed health means that acreage in areas can be managed to allow for more effective watersheds and an increasing water quantity for downstream users.

Additionally, Delta County urges the GMUG plan to reflect lessons learned from other forests who have experienced mega fire events, had critical watersheds destroyed and severely impacted communities within and adjacent to the forest boundary. The East Troublesome Fire (Northern Water Conservancy), Grizzly Creek Fire (Glenwood Springs water), and Pine Gulch Fire (Town of De Beque water) are graphic examples of the extensive damage that can be done to watersheds and water infrastructure by fires.

While the Draft EIS for the GMUG acknowledges the changing climactic conditions, some of its proposed elements such as additional designated Wilderness areas, Special Management Areas and increases in wildlife habitat and enhanced recreational focus, are creating a situation that, ironically, is at cross-purposes with conserving the land and increasing its resilience; these make more difficult the job of applying the treatments the land requires to have resilience. Virtually all stakeholders agree on preserving and ensuring sustainability of the GMUG's valuable resources, how to achieve those goals is the issue.

#### Comments on the 2021 Draft EIS

Watershed protection: Watershed protection affects all aspects of forest management, intersecting activities from grazing, recreation and ecosystem health and maintenance, to wildlife, vegetative management and harvesting timber, fuels reduction and more. While the GMUG staff proposes a more significant focus on recreation, Delta County believes the primary focus must be on the protection of watersheds that support local communities

adjacent to and within the GMUG.

As identified in Volume 1 of the Draft EIS, Key Ecosystems Characteristics- Aquatic Ecosystems on page 112, "The GMUG has an estimated 3,657 miles of perennial streams and rivers, 1,390 miles of major intermittent streams, and 5,815 miles of minor (unnamed) intermittent streams". The Draft Revised Land Management Plan ("LMP"), page 8, further states "With more waterrelated special uses than any other national forest, the GMUG serves as critical headwaters. Protecting and sustaining these watersheds provides a high-quality, local source of 1.9 million acre-feet of water that is consumed by the population of western Colorado and the southwestern part of the United States and sustains the region's ecosystems and wildlife habitat." Delta County acknowledges the GMUG's approach to sustaining water resources, supports these specific features, and advocates for inclusion in the final Plan.

FW-GDL-REC-12 (Draft Revised LMP, page 62): Delta County requests clarification on whether "administrative uses" include those for watershed and water infrastructure development/ maintenance? Please define precisely what "administrative" use allows or prohibits for greater clarity.

Forest Plan Objectives, Table 35 Fuels (Draft Revised LMP, Page 180): Given the quantity and intensity of wildfires in the west, Delta County believes that grazing can aid in fuels reduction, thus decreasing the threat of wildfire across all federal lands. Grazing has also been found to contribute to controlling invasive plant species. Delta County appreciates the addition of the verbiage on page 59 of the Draft Revised LMP to "Seek opportunities to apply targeted grazing to support specific hazardous fuels reduction and prescribed fire treatments". We ask that this language also be added to the Fuels Resource for the Forest Plan Objectives, Table 35.

FW-GDL-FFM-03 (Draft Revised LMP, Page 25): In regard to fire suppression activities, Delta County recommends:

1. The USFS identify a more robust fuels management maintenance schedule as well as a significantly enhanced collaborative plan with stakeholders involved in wildland fires.
2. The USFS identify and target watersheds that are critical to vital water supplies as soon as is practicable, and focus intensive vegetative management treatments to reduce fuel loads so that the vital liquid resource is protected to the maximum degree possible. This would include providing enhanced access to critical watershed areas to allow for firefighting and vegetative management activities identified in Alternative C.
3. Utilize more mechanized/motorized removal and thinning to reduce fuel loads. Work actively with stakeholders such as Montrose Forest Products and other stakeholders to achieve these goals.
4. Identify timber harvest as a best management practice for managing carbon, based on sequestration in wood products and elevated growth rates after harvest.
5. Identify the USFS classified roads that would be utilized for firefighting access in each watershed. Characterize road conditions and develop maintenance schedule so that access to fires is not delayed by poor road conditions. Conduct the required maintenance as scheduled.

Fuel Treatment Comments for Watershed Protection and Resilience:

1. The current Draft Plan limits timber harvesting to slopes of 40 percent or less. Delta County recommends the Plan recognize and acknowledge that new harvesting technology, such as cable and tether systems, allow harvesting on slopes up to 60 percent with minimal ground disturbance. With steep topography being one of the major contributors to fire intensity and behavior, this new technology is becoming an increasingly important tool

for addressing forest health and reducing the intensity of fire behavior.

2. To enhance stand resilience and overall forest health and to provide for more robust fuels management, Delta County recommends increasing the size of clear cuts allowed in lodge pole and aspen stands rather than limiting it 30 acres or less, as currently defined. Delta County recommends an acreage size that is economically feasible and allows for landscape vegetation management.

3. Delta County is opposed to an additional category of "climate refugia" that will include additional restrictions and regulation. Existing management plans and designations are adequate. Adding an additional category of land management obligations will further complicate an already full categorical plate of management obligations on the GMUG and will encumber the job of responding to a changing environment.

4. Provide for a permitting process that is clear and efficient for all stakeholders. Identified fuels treatment areas should have additional staffing resources engaged to conduct necessary NEPA actions ahead of permitting.

Socio-Economic Specific Comments: As identified in the Draft Revised LMP (page 9), "Accounting for nearly one-fifth of total net timber growth and a quarter of all growth on national forests in Colorado, the GMUG continues to be one of the largest commercial timber-producing national forests in the Rocky Mountain Region. The GMUG's timber program plays an important role in maintaining the viability of the timber industry in the State of Colorado. The largest sawmill in Colorado and five surrounding states is located in Montrose: the majority of its wood fiber is from the GMUG. This mill and the larger wood fiber economy in the local area, provides significant socio-economic benefit to the regional communities.

1. As the interval between forest plan revisions often exceeds 10 - 15 years, and because the reduced harvest threshold identified in the Draft EIS has long-term systemic deleterious impacts on local businesses that are dependent on forest harvest, Delta County would like to urge an increase in the suitable annual harvest for timber, increased from 55 hundred cubic feet ("CCF") (22.5 million board feet) to 70 CCF (35 million board feet). Delta County prefers Alternative C for its more active forest management on this particular issue.

2. Projected harvest levels are below the best sustainable capacity of 70 CCF for the mill in Montrose. The Montrose mill creates and sustains 549 direct and indirect jobs with an annual payroll of \$16.4 million and contributes \$65.4 million<sup>1</sup> [1 (Total Earnings | Payroll Direct and Indirect \$16.4M annually this does not include operations. Multiplier x 4 = \$65.6 million annual contribution to regional economy including related forest product businesses in Delta and Mesa Counties - Montrose Economic Development Corp).]annually to the region's economy, including that of Delta County. Current volume projected in the plan is inadequate to support this vital business with locally sourced forest fiber.

Travel Management & Access outreach and coordination with the affected local governments.

Timber: Delta County continues to support an increase in timber harvest on the GMUG. With the continued forecast for both unprecedented drought and corresponding mega fires, Delta County advocates for a very robust fuels reduction and forest health management approach. Delta County also encourages the GMUG to vigorously pursue forest restoration and utilize new technology for timber harvesting to maximize the acreage treated.

Salvage vs Green Timber (Draft EIS, Volume 1, Page 387): Salvageable timber supplies from pine beetle kill have declined significantly since rollout of the Draft Plan in 2018. What remains of the standing beetle-killed lodge pole timber has degraded and lost most of its value as a reliable supply of dimensional lumber. Delta County urges the GMUG to refocus its attention on additional green timber sales to achieve the following objectives:

1. Protect and make more resilient the critical watersheds of the GMUG;

2. Create better protection in the Wildland Urban Interface ("WUI") areas;
3. Combine with major fuels mitigation efforts to reduce fuel available for wildfires;
4. Achieve compliance with socio-economic objectives for forest-dependent industries in the communities of Delta and Delta County; and
5. Resolve the persistent issue of a lack of transport of forest fiber by increasing supply closer to mills, enhancing the hauling economics.

Hunting: Hunters purchase 50,000 big game hunting permits on the GMUG each year, providing significant economic benefit to the communities in and adjacent to the GMUG. Delta County encourages the most robust collaboration possible with Colorado Parks and Wildlife regarding wildlife.

Rangeland, Forage, and Grazing: Overall the rangeland portion and impact analysis in the Plan are consistent with existing range science and resource conditions. Although private ranches are beyond the regulatory purview of the GMUG and USFS in general, it should be recognized that the preservation of these properties as working ranches helps support management objectives of the GMUG and that GMUG grazing management is partly responsible for the continued economic viability of these ranches. Although the Plan is generally consistent with accepted range science, there are specific areas of concern that include:

1. Recreation is given a higher priority than other multiple-use activities and in specific references indicates that livestock grazing may be displaced by recreational activities due to impacts of recreation. The Plan should establish priorities for distinct uses, however, prescribing permit alterations in advance of demonstrated impacts is moving straight to a single solution for a complicated problem, and could be considered pre-decisional in a National Environmental Policy Act ("NEPA") context. Continuing with this same theme, the Plan generally prescribes the cure for declining conditions or resources on the forest as reducing livestock numbers or time on the allotment without considering other alternatives. The GMUG Plan must direct agency staff to first determine, through quantitative data, that livestock are the causal effect of the decline.
2. Livestock grazing is briefly mentioned as a tool for vegetation management, however additional emphasis needs to be placed on the role that grazing can play in reducing fuel loads, reducing invasive plants, and general vegetation management. Wildlife is mentioned as inadvertent spreaders of weed seeds, however livestock are listed as a causal factor. Both vectors need to be listed in a similar fashion as the mode of spread from both sources are similar.
3. Livestock are listed in the Plan as causing trampling of water sources. While this is accurate, it would be more correct to indicate that both livestock, wildlife, and recreationists may cause impacts to streambanks and water sources. Additionally, livestock grazing is listed in the same level of impact to scenic resources as fire management. This specific reference is not realistic, nor reflective of actual conditions on the ground. Livestock waste is mentioned as dominating grasslands and meadows, this is also not realistic, nor actualized on the vast acreage of the GMUG. Range management is listed as adverse in numerous paragraphs, specifically when scenery is mentioned.
4. In the recreation section, it would be important for the USFS to list that in addition to seeing wildlife, recreationists may see livestock on the landscape when utilizing Wilderness areas. This statement is included for general forest areas but is not mentioned in the Wilderness section.
5. Unnecessary fences are mentioned for removal, however there is no guidance to help USFS personnel first determine how fences should be categorized or what constitutes an "unnecessary" fence. Nor does it identify

when or how grazing permit holders will have input into the determination of a fence's necessity.

6. Specific to carbon sink information, rangelands are not mentioned as sequestration sites. Research clearly shows that rangelands are a significant source of carbon sequestration which needs to be mentioned in the Plan, especially given the length of the implementation of the Plan. Forest lands and other areas are mentioned, however, rangelands need to be included in this list, as well as an estimation of the carbon sequestration they provide. Rangelands are a large repository of soil carbon because of their high carbon density and the vast land resource area they represent. Improved range management strategies have been shown to significantly increase soil carbon storage while concurrently providing other benefits such as improved water infiltration, increased water storage capacity, and greater nutrient reserves. Because productivity of rangelands is inherently low with traditional low-input management systems, suggested strategies for improving production, and concurrently soil carbon sequestration, include:

- a. using appropriate plant species;
- b. enhancing water-use efficiency;
- c. controlling erosion and restoring degraded soil; and
- d. managing and enhancing soil fertility.

These management strategies would support multiple management goals within the Plan, including the carbon sequestration targets. It is important to add to the landscape narrative that the private land ranches surrounding most federal lands are generally tied to the use of federal lands which creates additional wildlife habitat, carbon sequestration, and open space.

7. The broadly-mapped "wildlife corridors" could be used to curtail a wide range of uses, including grazing, on large parts of the landscape. Reducing permit numbers and/or allotment time should not be the direction provided as an initial tool when working to reduce the direct contact between bighorn sheep and domestic sheep. Additionally, the specific language refers to pack goats and domestic sheep as solely responsible for the long-term viability of bighorn sheep which is not accounting for all of the other influences that also are currently impacting the health of the bighorn sheep.

Minerals:

Nonrenewable Energy and Minerals (Draft EIS, Volume 1, Page 323-324): "Coal production and use in power generation is expected to continue to decline during the plan horizon for various reasons, including climate change is mentioned in the plan. Historic locatable mineral mining in the GMUG has included gold, silver, copper, uranium, molybdenum, and other minerals with unique properties primarily in Gunnison, Ouray, San Juan, and San Miguel Counties. At present, there is no active production for locatable minerals occurring in the GMUG, and current trends do not indicate an increased in proposed production during the planning period."

1. With increasing demand for and scarcity of domestic sources of Rare Earth Elements ("REE") for batteries, solar panels, and other renewable sources, the GMUG needs to acknowledge this new demand as noted by both the Department of Energy and the Department of Commerce.

2. Coal and coal byproducts can be a source of REE; further, coal for power generation can bridge gap during waning periods of renewable sourced power.

3. The Office of Fossil Energy & Carbon Management ("FECM") funds the National Energy Technology Laboratory ("NETL") Feasibility of Recovering Rare Earth Elements Program which focuses on developing

technologies for the recovery of rare earth elements and critical minerals from coal and coal-based resources.

4. GMUG must streamline permitting and review processes related to developing leases, enhancing access to critical mineral resources, and increasing discovery, production, and domestic refining of critical minerals.

5. The Plan should acknowledge, identify areas with REE potential in coordination with BLM and United States Geologic Survey ("USGS") expertise, develop appropriate land use plans, and include provisions for coal leasing in areas that recoverable coal reserves are present in this plan horizon. Designating additional wilderness and restrictive special management areas will hinder the access to these critical minerals.

6. As with other multiple use USFS resources and land uses, the GMUG Plan needs to identify areas of suitable and unsuitable locations for renewable energy projects. Criteria that could be included in determining the locations include geologic instabilities, steep slopes, forest and soil health parameters, existing uses, wildlife concerns, view sheds, existing permit holders, and existing and planned recreation activities. As with mining, timber, recreation, and other forest uses there are areas that would be incompatible for renewable energy projects. Identification of those areas should follow significant public input and be included in this plan horizon.

Sustainability of Energy and Mineral Resources and Uses (Draft EIS, Volume I, Page 342): The Energy Information Administration ("EIA") has identified the necessity for coal production thru the course of the GMUG Plan horizon into 2050. The USFS published a coal resource study in 2004, with a 2006 update, evaluating all coal resources with the GMUG area:

"The Grand Mesa, Uncompahgre, and Gunnison National Forests contains several geologic formations that contain coal, or have a high potential for the geologic occurrence of coal within five currently recognized coalfields; the Carbondale, Crested Butte, Somerset, Grand Mesa, and Tongue Creek. Based on evaluation completed by the USGS, the lands within the GMUG considered to have coal resource potential are in areas where underlying strata are likely to have accumulated in a coal-forming environment, and the potential coal-bearing rocks are less than 6,000 ft deep. The coal resources on the GMUG occur primarily in the Upper Cretaceous Dakota Formation, Delta Verde Formation and Group, and the Fruitland Formation. Using input and information from BLM, the GMUG estimates that coal development would occur in an area generally surrounding existing operations in the Somerset coalfield and into eastern portions of the Grand Delta coalfield in the next 10 to 15 years. This area encompasses about 45,280 acres and contains an estimated 829 million tons of recoverable coal reserves".

FW-DC-ENMI-01 (Draft Revised LMP, Page 47): The plan identifies the following statement on page 47 of the Draft Revised LMP "All energy and mineral activities are processed in a timely manner; minimize the environmental effects to other national forest resources to the extent practical through protection and mitigation measures, and adequate reclamation plans; and are processed with adequate financial assurances in place when necessary." This is further supported in the Plan on page 9, Ecosystem Services and Multiple Uses at bullet point 8 which states:

"The GMUG 's energy and mineral resources, including those of the Somerset coalfield and the Southern Piceance and Paradox oil and gas producing basins, contribute to national security and energy supply and local economies and may generate royalty revenue to the U.S. treasury, State, and local governments. Other mineral commodities, such as aggregate or gravel, are used in maintaining forest and county roads. Hardrock minerals, mined under the General Mining Act of 1872, as amended, contribute to local and broader economies. "

The Plan Alternatives identify adding additional Wilderness and Special Management Areas that will conflict with the USFS Desired Conditions for robust local industries, local employment, and timely processing of proposed activities on the Forest. The Plan should readdress the alternatives to ensure all stakeholders in a multiple use management objective are provided the same standing.

Draft Revised LMP FW-DC-02 (Page 21): Delta County would like to reiterate our advocacy for more active management and a continued commitment to provide forest goods and services that will sustain local businesses and communities. The economic contribution of the GMUG is vital to families and communities across the Western Slope, it is important that the USFS remains committed to managing the forest in order support those opportunities.

Wilderness, Roadless, and Special Management Areas: As noted in several previous comment letters, Delta County is not supportive of additional Wilderness or Wild & Scenic designations within the county.

The Kelso area, identified as containing a high degree of wilderness characteristics is popular for back country hunting, hiking, dispersed camping and other outdoor recreation. Aside from recreation activities, the area is utilized for cattle grazing, oil and gas leases and timber extraction, all of which support a diversified economy for Delta County. The western edge of Kelso Mesa is heavily checker boarded with private land, which would make effective management of a wilderness area extremely difficult and would be a significant burden on the landowners (Delta County citizens) in that area. Further, Delta County believes Wilderness designations:

1. Make more difficult, the job of creating resilient ecosystems and protecting watersheds and water infrastructure by restricting access and using motorized/mechanized activities that are needed for the significant work required to do so;
2. Lack of active management results in an increased potential for catastrophic fire from a tremendous buildup of natural fuels due to the inability to properly manage fuel loads by mechanized thinning, proper grazing, and timber extraction;
3. Prevent motorized and mechanized use, such as vehicles, mountain bikes, chainsaws, ATVs, snowmobiles, and motorcycles which could have an adverse effect on the economies of the Western Slope. Motorized and mechanized recreation are areas of important and steady economic growth throughout Colorado and specifically in Delta County;
4. Place an undue hardship on anyone who is unable to walk or ride horseback, including those with physical disabilities or the elderly; and
5. Create obstacles for permitted livestock growers who need to maintain fences and water sources within the Wilderness Areas;

Regarding the proposal of designating stream segments on Kelso Creek as Wild & Scenic stream segment for the Fish Outstanding Remarkable Value ("ORV"), Delta County believes the USFS cannot dependably manage this stream to preserve its ORV because it is fully appropriated and calls have regularly been made on its flow. Therefore, the ORV should be considered invalid. Delta County opposes the reduction in flexibility and active management that is afforded by the less restrictive management overlays.

Air Quality:

FW-DC (Preliminary Draft Revised Land Management Plan, Page 11) and FW-GDL-AQ-11 (Preliminary Draft Revised Land Management Plan, Page 11): We continue to have concerns that metrics for measuring air quality in the West Elk Wilderness can be used to negatively impact normal agricultural and industrial activities such as ditch burning and water infrastructure work on adjacent non-forest lands. Further, Delta County is concerned that air quality management for the West Elk Wilderness (a Class I area) has the potential to preclude oil and gas development in the North Fork Valley areas, and to restrict development in other nearby areas such as the Collbran Valley.

#### Water Quality and Water Development:

FW-STND-RMGD-34 (Preliminary Draft Revised Land Management Plan, Page 15): Delta County reiterates its resistance to a framework which identifies a protective zone extending across the entire "inner gorge" of perennial and intermittent streams. The existing 100 to 200-foot buffer is adequate, and "inner gorge" in some cases could be drastically larger than is necessary or appropriate, especially for intermittent streams draining lower reaches of the GMUG. As proposed, this will apply to significant acreages on the GMUG, rendering the acreage off limits to management activities.

FW-STD-RMGD-35 (Preliminary Draft Revised Land Management Plan, Page 7): Delta County reiterates that any restrictions on activities under the riparian management sections at a minimum, be limited to activities that demonstrably harm water quality and provide the ability to minimize or mitigate potential impacts. Restriction on all activities that do not maintain or improve long-term stream health within the riparian management zone could preclude large numbers of economically-important activities, including water diversions, grazing management, road construction, timber harvest and types of multiple uses, which the GMUG is statutorily obligated to allow.

Bypass Flow: Bypass flows should be applied only as a last resort. The agency and stakeholders have submitted 22 alternatives to federal bypass flows. Bypass flows should only be applied to permit holders once those 22 alternatives have been exhausted.

Combine forest projects when possible: As both have the ability to positively impact long-term water Quantity/Quality ("QQ"), Delta County encourages the USFS, whenever possible, to analyze forest health and watershed health projects simultaneously.

Water Infrastructure Access: Motorized and mechanical access to the forest is necessary for safe operation and maintenance of water facilities. There is a finite window of time between snowmelt and snowfall and access; maintenance, and operation of water system infrastructure must be accomplished efficiently within that window. Delta County asks that the USFS to streamline the approval process for maintenance and operation of water systems infrastructure.

Oppose Additional Wild and Scenic Provisions or Expansions: Managing for forest health and water management activities in these restrictive management areas is unnecessarily cumbersome and, in some instances, even prohibited.

Previous Wilderness Specific Comments from Delta County: Wilderness and special management areas complicate land management by dint of the plodding rate of review that can last decades. We do not support long term designation of the Colorado Roadless Areas ("CRAs") which are de facto wilderness areas. This would include the Kelso Mesa area.

Mt. Lamborn: Water maintenance projects in the West Elk in particular provide an example of maintenance that is required to be primitive. They are difficult to maintain, particularly in drought years which are increasing and predicted for the foreseeable future.

Beckwiths: Oppose this potential designation because a wilderness designation would adversely impact the adjacent private lands. As an aspen-dominated ecosystem, which depends upon active management to stay healthy in the face of the aspen decline syndrome, a wilderness designation would impair flexibility of active management that helps maintain resilient stands, while harming hunting, hiking and scenic driving. Additional complications managing Norris Ditch would also be conferred by wilderness designation.

Additional general comments specific to Delta County include:



1. What level of recreation activities and resulting impacts in each of the GMUG plan alternatives are expected with the emphasis on recreation? What specific locations and impacts would be reasonably foreseeable?

2. Which of the specific locations identified in No. 1 would then require access permits or other management restrictions to mitigate resource impacts? Delta County would encourage the GMUG to get ahead of the curve and let the public know which sites are most at risk and what the USFS is doing to prevent resource degradation.

3. The GMUG has numerous camp grounds that are in various levels of maintenance and conditions. The GMUG should identify which camp grounds and other recreational facilities would need to be expanded with the emphasis on recreation.

4. Numerous USFS Classified Roads are in poor to very poor condition. The GMUG Plan should enumerate the policies and schedule for the maintenance backlog on current roads and other facilities within the GMUG area.

Delta County fully understands limited budget but encourages USFS to be judicious when recommending more closures without the appropriate structure to enforce. Additional staffing and resources are needed to maintain existing infrastructure and implementation for roads, campgrounds, water infrastructure etc. Existing areas need to remain the priority versus developing additional acreage that needs special attention and will ultimately deplete resources from existing infrastructure.

Delta County thanks you for consideration of these comments and for providing the GMUG counties the opportunity to be involved in this process. We look forward to remaining engaged as the Plan is finalized and implemented.