



USER'S GUIDE TO THE CIMARRON AND COMANCHE NATIONAL GRASSLANDS DRAFT PLAN

U.S. Department of Agriculture, Forest Service
Pike and San Isabel National Forests
Cimarron and Comanche National Grasslands
2840 Kachina Dr.
Pueblo, CO 81008



Photo by Steve Olson

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This user's guide begins to answer some questions that we've been hearing, and have had, since we began the Draft Cimarron and Comanche National Grasslands Plan. Most of them are about the new planning rule, released in January 2005. This new rule, the 2005 National Forest System Land Management Planning Rule (2005 Planning Rule) brings about changes in some of the key elements of planning. One of those changes is the size, layout, and contents of the Plan.

The actual 2005 Planning Rule is short and readable (pages 1055-1061). The pages that precede the actual plan explain the development of the rule and give an overview of the rule itself. This section also includes a summary of comments (that were received about the proposed rule) and responses to those comments.

The first part directly addresses some of those questions. The second part reviews the new organization of the physical Draft Plan. The third part gives information about using the Draft Plan and its relationship with some existing decisions, and the fourth part sets out some of the new changes in public involvement and responding to the Draft Plan and the final Plan. The final section lists some places to get more information and to access some of the documents referred to.

If you have questions that you'd like added to this user's guide, please let us know.

Initial Questions

Why revise the PSICC Plan?

The National Forest Management act (NFMA) requires that all Land and Resource Management Plans (Plans) are revised every 10-15 years. The Pike and San Isabel National Forests, Cimarron and Comanche National Grasslands (PSICC) Land and Resource Management Plan was completed in 1984 (1984 Plan)¹.

This Draft Plan is specific to the Cimarron and Comanche National Grasslands. A revision of the 1984 Plan for the Forests is underway.

Why is this Draft Plan so different from the existing Plan?

The Cimarron and Comanche National Grasslands (Grasslands) has the honor of being the first Forest Service unit in the nation to release a draft plan under the 2005 National Forest System Land Management Planning Rule² (2005 Planning Rule). This is the main reason why this Draft Grasslands Plan looks so different from the 1984 Plan. The major differences you might notice:

- It's shorter.

¹ U.S. Department of Agriculture, Forest Service. 1984. Land and resource management plan – Pike and San Isabel National Forests; Comanche and Cimarron National Grasslands. Pueblo, CO.: U.S. Department of Agriculture, Forest Service, Supervisor's Office. 4 vols. plus appendices.

² Code of Federal Regulations: 36 CFR 219. Federal Register Vol. 70, No. 3, January 5, 2005, pages 1023-1061.

- There is a longer discussion of the overall vision for the Grasslands, expressed as “desired conditions.”
- There’s no EIS.
- There are no “standards.”
- We have excluded policies, practices, and procedures that are more appropriately addressed in the agency’s directive system or through other guidance material.

Where’s the EIS?

Plans, like this Draft Grasslands Plan, that are developed under the 2005 Planning Rule are strategic and aspirational, rather than prescriptive like the existing Plans. The 2005 Planning Rule anticipated that because plans like the Draft Grasslands Plan would not have on-the-ground effects they could be categorically excluded from NEPA documentation.

What’s this EA?

We anticipated that the categorical exclusion would be established by the time our Draft Grasslands Plan was released for public comment. This didn’t happen, so, in the absence of a categorical exclusion, it was decided to release an EA/FONSI with the Draft Grasslands Plan. The EA shows that the Draft Grasslands Plan has no significant effects on the human environment. It summarizes key points from the Draft Grasslands Plan; the “no action” alternative is the existing 1984 Plan.

If necessary, based on comments on the EA/FONSI that is being released with the Draft Grasslands Plan, another EA/FONSI may be developed for the final Grasslands Plan; this one would replace the EA/FONSI being released.

Where is the comprehensive evaluation report?

Evaluations and analyses produced during the planning process underpin the contents of the Draft Grasslands Plan. Together these documents make up the initial comprehensive evaluation report (CER). They include evaluations of current ecological, economic, and social conditions and trends that contribute to sustainability.

Every five years the CER must be updated. Changes from the conditions and trends in previous evaluations must be described, and may be based on monitoring, surveys, assessments, analyses, or other appropriate studies (36 CFR 219.6). Based on a review of the updated CER, changes may be made to the Grasslands Plan³.

The Cimarron and Comanche National Grasslands Land Management Plan (Plan) will guide subsequent project and activity decisions. The Plan is not a final decision. For project-level activities, there will be public involvement as specific decisions are made, such as changes to oil and gas leasing, allotment management plans, or specific projects (for example, treating invasive species like tamarisk).

³ The CER is described in the 2005 Planning Rule (36 CFR 219.6).

In most cases, the general direction of the Plan will be translated into the design of specific projects or activities. If the broad direction needs to change, the Plan may be amended with additional public involvement during project planning.

The New Organization

The Draft Grasslands Plan contains the five components required in the 2005 Planning Rule: desired conditions, objectives, guidelines, suitable uses, and special areas. Desired conditions, objectives and guidelines are based on analysis, collaboration with interested parties and individuals, and the best available science.

The Draft Grasslands Plan *document* has three main parts, listed below, based on a prototype developed by the Washington, D.C., Office of the Forest Service.

1. Part 1 is the vision—the desired conditions or aspirations for the landscape, its people, and its resources.
2. Part 2 is the strategy--the objectives that will move us toward the desired conditions.
3. Part 3 is the design criteria—the guidelines that are parameters for site-specific, on-the-ground projects and activities.

Because each of the three parts can be removed and used on its own, the Draft Grasslands Plan is more usable and less awkward than previous land management plans.

Part 1: Vision (Desired Conditions)

This first section, the Vision, contains brief summaries of existing conditions and descriptions of the desired conditions--what we aspire to--in terms of the Grasslands' land administration; ecological, economic, and social resources; and physical resources. The ecological dimension of the Grasslands is divided into the four ecosystems that make up the Grasslands: Canyonland, Riparian-Aquatic, Sandsage Prairie, and Shortgrass Prairie.

Desired condition descriptions do not prescribe management actions or projects, but they do establish purposes for those projects. They may describe or illustrate conditions or processes, and they can be monitored.

Achieving desired conditions is not dependent on a specific measurement or methodology, but can be determined using a variety of methods.

Part 2: Strategy (objectives, suitability of areas, special areas)

Objectives are measurable actions or conditions intended to maintain or achieve the desired conditions described in Part 1. They provide the what, when, how, and sometimes where, for meeting desired conditions or for moving toward achieving desired conditions. Objectives are not compulsory actions or conditions. Although circumstances outside of

agency control may prevent their accomplishment, objectives do describe the intent and focus of Grasslands management within the 15-year planning period.

The Draft Grasslands Plan identifies areas that are generally suitable for a variety of multiple uses, and where these uses are compatible with the area's desired conditions. The actual suitability for a particular use, even if an area is identified as generally suitable for use, will not be determined until a project or activity is authorized.

Special areas may have different management direction that represents their unique or special characteristics. Several of these areas have been identified for the Draft Grasslands Plan and are being recommended as special areas.

Part 3: Design Criteria (Guidelines)

This part of the Draft Grasslands Plan is organized in the same way as Part 1 and Part 2: Ecological, economic and social, and physical resources. We have also included the guidelines in a table organizing by unique identifiers, such as Lands, Livestock, Recreation-Tourism (see Appendix C).

Guidelines are the parameters for developing and implementing site-specific projects and activity decision-making that will help achieve desired conditions in Part 1 and objectives in Part 2. In some cases, one or more guideline may be associated with one or more objective.

A project or activity would follow the applicable guidelines unless there is reason for deviation. In that case, the Responsible Official would produce a project-level document recording the reasons for such deviation (no Plan amendment is required). Guidelines are not commitments or final decisions that approve projects and activities.

Putting the Plan to Work

This part explains some of the real-life ways the Plan and its components will work.

How do the five component of the Plan work together?

The different parts of the Plan will be used differently in designing projects and activities. As way of measuring progress toward overall desired conditions, *objectives* will guide overall program design. Most projects and activities will be developed specifically to achieve or maintain one or more of the *desired conditions* and objectives of the Plan. However, it may be possible for a project or activity to be neutral to relevant desired conditions, or to have short-term deviations to achieve long-term progress toward desired conditions.

The Plan generally identifies the *suitability of areas* for a variety of multiple uses by identifying which uses are suitable or not suitable with the area's desired condition. This identification will be used to determine in a project decision if uses will actually occur. This suitability can be changed with a Plan amendment at the time of a project, or by a

Plan correction if a mapping error was made.

Relevant *guidelines* will be incorporated into project design, unless there is a documented reason to adjust it (generally no amendment would be required in that case.) Finally, the Draft Plan has identified areas to be considered for designation as *special areas*. These areas have their own unique desired conditions, objectives, suitable uses, and guidelines.

How will you monitor progress towards desired conditions?

Through a collaborative process, a comprehensive 15-year monitoring program will be developed between the Draft and final Grasslands Plan, and will be included as part of the final Grasslands Plan.

To track performance and verify that we are moving toward desired conditions and that multiple-use objectives are being met, ecological, economic, and social conditions and trends may be monitored and measured annually (for selected projects) or every five years (on all Plan components). When implementing the monitoring program, information would be collected and assessments would be made of key changes in conditions and trends that contribute to sustainability. Monitoring shows us how well on-the-ground management is maintaining or progressing toward desired conditions. Monitoring would also identify any needed adjustments to the program to account for unanticipated changes in conditions.

How does the Grassland Plan affect existing decisions?

This Plan is not changing any existing decisions for the Grasslands, such as the oil and gas leasing decision or the range allotment management plans. At a future date, if these decisions are revised, the broad direction in the Plan will be considered.

Oil and Gas Development

The Cimarron and portions of the Comanche National Grasslands have a high potential for the occurrence of petroleum resources (oil and gas). An environmental impact statement prepared in 1991 covering oil and gas development addressed these resources and the projected development over the following 10-15 years. In 1992 the Forest Supervisor signed a Record of Decision that approved management of this program which covers an average of nine new wells completed each year.⁴ These drilling estimates were reassessed in 2003, resulting in a future projection averaging 11 wells completed per year over the next 15 years⁵. This reassessment validated the 1992 Decision, and Grasslands management of the oil and gas program will continue as in the

⁴ U.S. Department of Agriculture, Forest Service. 1992. Oil and gas leasing record of decision. Pike and San Isabel National Forests, Comanche and Cimarron National Grasslands. Unpublished report on file at the U.S. Department of Agriculture, Forest Service, Pike and San Isabel National Forests and Cimarron and Comanche National Grasslands Supervisor's Office, Pueblo, CO. 59 p. plus appendices.

⁵ Department of Interior, Bureau of Land Management. Oil and gas foreseeable development for the Pike and San Isabel National Forest. 2003. USDI, BLM: Canon City, CO.

past. During development of the Draft Grasslands Plan, it was found that the desired conditions, objectives, and guidelines of the Plan would be compatible with the 1992 Decision. Therefore, the Plan is not changing any existing direction for the oil and gas program.

Rangeland Management

The Grasslands have current decisions in place for managing livestock grazing⁶. The permittees, organized into four grazing associations and one grazing district, are authorized to graze cattle under permits that specify stocking rates, season of use, and other management practices. This will move us toward the desired conditions of the Plan. All decision notices issued for this program will remain in effect as this Land Management Plan is implemented.

Collaboration and Public Involvement

Rather than continue the familiar model of holding public meetings in which the Forest Service presented information and the public asked questions, we have begun and will continue to engage in collaboration with all interested parties, including individuals, organizations, state and local governments and Federal agencies and tribal governments.⁷

To date we have held workshops and open houses, sent out newsletters, kept current information on our Web site. Collaboration will continue. If you'd like to be on our mailing list, let us know.

⁶U.S. Department of Agriculture, Forest Service. 2004a. Allotment management plan for the Campo Grazing Association. Unpublished report on file at the U.S. Department of Agriculture, Forest Service, Pike and San Isabel National Forests and Cimarron and Comanche National Grasslands Supervisor's Office, Pueblo, CO. 15 p.

U.S. Department of Agriculture, Forest Service. 2004b. Allotment management plan for the Pritchett Grazing Association. Unpublished report on file at the U.S. Department of Agriculture, Forest Service, Pike and San Isabel National Forests and Cimarron and Comanche National Grasslands Supervisor's Office, Pueblo, CO. 20 pgs.

U.S. Department of Agriculture, Forest Service. 2002a. Allotment management plan for the Kim Grazing Association. Unpublished report on file at the U.S. Department of Agriculture, Forest Service, Pike and San Isabel National Forests and Cimarron and Comanche National Grasslands Supervisor's Office, Pueblo, CO. 120 p.

U.S. Department of Agriculture, Forest Service. 2002b. Allotment management plan for the Timpas Grazing District. Unpublished report on file at the U.S. Department of Agriculture, Forest Service, Pike and San Isabel National Forests and Cimarron and Comanche National Grasslands Supervisor's Office, Pueblo, CO. 34 p.

U.S. Department of Agriculture, Forest Service. 2002c. Cimarron allotment management plan. Unpublished report on file at the U.S. Department of Agriculture, Forest Service, Pike and San Isabel National Forests and Cimarron and Comanche National Grasslands Supervisor's Office, Pueblo, CO. 43 p.

⁷ See 36 CFR 219.9, "Public participation, collaboration, and notification."

From an Appeal Process to an Objection Process

Under the 1982 Planning Rule⁸, following the approval of a Plan, appeals were filed to contest parts or aspects of the Plan. The appeals process took a long time and cost a lot of money. Above all, it set up a relationship of opposition between the Forest Service and critics of the Plan.

Under the 2005 Planning Rule, however, collaboration with the public and other interested parties begins with the planning process. This promotes a less antagonistic relationship among parties and encourages relationships and interactions that can continue beyond the approval of the Plan or Draft Plan.

Rather than requiring a post-approval appeal process, the 2005 Planning Rule includes a comment period on draft plans.⁹ Later, before a plan is approved, there is a 30-day review and objection period.¹⁰ This is better than having an appeal process that happens after a plan is approved because it lets people collaborate, share ideas, and work out differences before the plan is completed. It encourages proactive collaboration among all interested parties. (This process is modeled after the successful objection process used by the Bureau of Land Management.)

Only those who participated in the comment period for the Draft Grasslands Plan may object to the Final Grasslands Plan. Full participation in the planning process requires that written comments are received during the comment period. For the Draft Grasslands Plan, the comment period runs from December 28, 2005 through April 3, 2006.

Where to Get the Draft Plan, the EA/FONSI and Related Documents

The Draft Grasslands Plan, the EA/FONSI, and supporting documents (such as evaluation reports, species diversity reports, specialists' reports) can be accessed, viewed, and downloaded in pdf format from our Web site at http://www.fs.fed.us/r2/psicc/projects/forest_revision/plan_documents.shtml.

The Draft Grasslands Plan and EA/FONSI are available in paper copy or on CD, by request, from the PSICC Supervisor's Office in Pueblo.

PSICC – Forest Supervisor
2840 Kachina Drive
Pueblo, CO 81008

E-mail: r2_psicc_grassrevision@fs.fed.us

⁸ See 36 CFR 219. Federal Register, Vol. 70, No. 3, January 5, 2005, pages 1023-1061.

⁹ See 36 CFR 219.9, "Public participation, collaboration, and notification."

¹⁰ See the 2005 Planning Rule--36 CFR 219.13, "Objections to plans, plan amendments, or plan revisions."

How to Comment on the Draft Grasslands Plan

We welcome your comments and suggestions about the Draft Grassland Plan, the EA/FONSI, and the supporting documents (evaluations, reports, maps). The comment period runs from December 28, 2005 through April 3, 2006.

Please keep in mind that only individuals or groups that participate in this comment period may object to the final Grasslands Plan (see the section about the objection process). Full participation in the planning process requires that written, e-mailed, or faxed comments be received during the comment period.

The most helpful comments would be related to the following questions:

1. Does the Draft Grasslands Plan clearly state the desired conditions of the Grasslands and are they realistic and achievable?
2. Does the Draft Grasslands Plan clearly state what ecological, economic, and social conditions are desired and why?
3. Can the Draft Grasslands Plan be implemented as written? If not, what changes are needed and what obstacles exist?
4. Is there additional, relevant scientific information that could be used in the analyses?
5. Would implementing the Draft Grasslands Plan lead to the achievement of the desired conditions? If not, tell us why not, and what changes are needed.
6. Is the Draft Grasslands Plan clear about what steps (objectives) will be taken to achieve or maintain the stated desired conditions? If not, what needs to be changed and how?
7. Do you believe that underlying assumptions and analyses that were used in developing the Draft Grasslands Plan are correct and based on factual information?
8. Have possible negative consequences, risks, or uncertainties been adequately considered? If not, what changes are needed?
9. Is the Draft Grasslands Plan consistent with laws, policies, and the multiple-use mission of the U.S.D.A. Forest Service?

Comments should meet the following requirements:

1. State that the comment is filed in response to the comment period for the Draft Cimarron and Comanche National Grasslands Land Management Plan (Draft Grasslands Plan).
2. Identify the title of the document that your comment is a response to.
3. Clearly state your comment and include reasons, recommendations, and supporting information.

Please note that all comments, names, and addresses become part of the public record and are subject to FOIA, except for proprietary documents and information. If there is a possibility that you will file an objection during the objection process, we recommend that the names and addresses of the interested parties are included with the comments.

Comments must be postmarked by April 3, 2006. Mailed, faxed, or emailed comments must be submitted to:

Cimarron and Comanche Draft Grasslands Plan
225 Bush Street, Suite 1700
San Francisco, CA 94104-4207

Fax: 415-896-0332

E-mail: ccgrassplan@caet.esassoc.com

Resources for More Information

The 2005 Planning Rule in the Federal Register (in pdf):

<http://www.fs.fed.us/emc/nfma/includes/rule%20.pdf>

The 1982 Rule, about the 2005 Rule, and background documents:

<http://www.fs.fed.us/emc/nfma/index.htm>

The PSICC Grasslands Revision Web site:

http://www.fs.fed.us/r2/psicc/projects/forest_revision/index.shtml

The new Plan model and about the model:

<http://www.fs.fed.us/emc/nfma/model.html>