

**GOGO/MUWO Draft GMP (Volume 2), September 2009 – Greg Cody’s Comments, October 28, 2009**

#	Page/Line/Section	Comment/Proposed Revision	DSC Response
1.	General Comment	Historic buildings and structures are variously referred to in the table of contents and in text headings throughout the document as historic buildings (pages, iv, vi, 586), historic structures (page 347), and prehistoric and historic structures (pages iv, 519). I recommend using the term historic buildings and structures consistently throughout the document.	
2.	Page 348, Indian Trust Resources, 2 <sup>nd</sup> Paragraph	I recommend deleting the reference to sacred sites. Indian trust resources and sacred sites are not the same thing. Sacred sites should be addressed under ethnographic resources on page 347 (i.e. there are no sacred sites in the park or monument).	
3.	Pages 705-730	<p>The analysis of cumulative impacts for each impact topic is relegated to the back of the document in Part 10: <i>Other Analyses and Statutory Considerations</i>. The cumulative impacts analysis should not be separated from the analysis of environmental consequences for each impact topic, i.e. under each impact topic for each alternative there should be a cumulative impacts analysis. The outline would be as follows:</p> <p style="padding-left: 40px;">Alternative 1</p> <p style="padding-left: 80px;">Impact Topic</p> <p style="padding-left: 80px;">Analysis of Direct and Indirect Impacts</p> <p style="padding-left: 80px;">Cumulative Impacts Analysis</p> <p style="padding-left: 80px;">Conclusion (including cumulative impact summation and impairment finding)</p> <p>Although this may create redundancy in what is said about cumulative impacts for impact topics between alternatives, it demonstrates that NPS has given consideration to the issue of cumulative impacts for each impact topic under each alternative.</p> <p>In addition, there should be a bottom line for cumulative impacts in each conclusion section under each impact topic for each alternative. The rationale for this is the requisite impairment determination - it is possible to have impairment resulting from cumulative impacts. Consequently, the cumulative impact conclusion or bottom line be a part of the topic's conclusion section so that it precedes the impairment statement we put at the end of our conclusion sections. Thus, for the conclusion section we have (a) identified and characterized the direct and indirect impacts of the alternative, (b) identified and characterized the cumulative impacts; and then (c) provided our conclusion regarding impairment, from which the reader needs to know items (a) and (b).</p>	