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November 21, 2012

Scott Fitzwilliams, Forest Supervisor
White River National Forest – Oil and Gas Leasing DEIS
P.O. Box 1919
Sacramento, CA 95812

RE: White River National Forest Oil and Gas Leasing
Draft Environmental Impact Statement (DEIS)

Dear Mr. Fitzwilliams,

The Eagle River Watershed Council (ERWC) advocates for the health and conservation of the Upper Colorado and Eagle River basins through research, education and projects. We work to protect and enhance the high quality natural, scenic and economic values that our rivers and tributaries provide.

The stated need for the DEIS is to respond to changing conditions since the last Oil and Gas Leasing environmental impact statement and subsequent record of decision in 1993, including the issuance of a new White River Forest Plan (2002), technological advances in oil and gas exploration and development and revised Reasonably Foreseeable Development scenarios.

We are submitting the following comments in the above-referenced draft environmental impact statement under public review:

1. Four alternatives are proposed in the DEIS, ranging from:
 - a. Alternative A: No action (current management).
 - b. Alternative B: No New Leasing.
 - c. Alternative C: Proposed Alternative.**
 - d. Alternative D: Mixed Roadless Stipulations.

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Under any alternative, it is understood that the Bureau of Land Management (BLM) will continue to manage the Federal mineral estate available in White River National Forest, forwarding any expression of interest by potential leases to the WRNF supervisor in accordance with existing regulations.

2. In Eagle County, which includes the Eagle River and Upper Colorado watersheds, Alternative C proposes that all lands not withdrawn from potential oil and gas leasing (only existing wilderness and permitted ski areas) would be classified as "Closed for Leasing Through Management Decision". It is understood that Congress is the only entity that can legally withdraw public lands from any potential future mineral leasing, therefore any potential alternative in Eagle County can only propose to close lands to leasing through management direction.
3. According to information provided in the DEIS there are currently no leased lands on WRNF existing in Eagle County except one exploratory gas well south of Gypsum in what appears to be the Cottonwood Creek drainage (RFDS Figure 2).
4. DRASTIC model results (Figure 21) indicate a large area at the headwaters of Red Dirt and Derby Creek that indicate groundwater resources potentially more susceptible to adverse effects from future oil and gas exploration and development activities. No similar analysis is provided for the balance of Eagle County areas included in WRNF.
5. Groundwater impact modeling cannot be quantified and specific lease stipulations related to direct and indirect groundwater impacts have not been developed for areas in Eagle County commensurate with those identified for active leases in the western provinces of WRNF.

Currently, management of all of the USFS lands (with the exception of legally withdrawn areas) in Eagle County are categorized as available and not authorized due to:

- No known potential (areas mostly bordering the Holy Cross and Eagles Nest Wilderness);
- Resource values (Upper Eagle and Gore Creek areas, Vail Ski Mountain);
- Other Unspecified management decision (Brush Creek and Lower Eagle, Piney).

Areas closed by proposed Alternative C are considered temporarily closed based on criteria including past interest for leasing, current leasing, exploration and potential for resources, among other decisions. If future interest is generated, a land availability decision to reopen these areas will require public

scoping. Lease stipulations would be determined as appropriate at that time. Lands in Eagle County recommended for Wild & Scenic river designation or eligibility are not considered legally closed for oil and gas leasing.

We support the continued closure of lands otherwise available through the proposed alternative. A future reassessment of resource values might conclude certain areas should be legally withdrawn instead of closed by management decision - particularly areas that serve as groundwater recharge or are in a municipal water supply influence zone.

Further, economic impacts of oil and gas production on area ski resort based economies (significantly different than provinces in the western WRNF zone) should be considered in any future management decisions including lease stipulations.

The Eagle River Watershed Council requests to be a cooperator in any future record of decision that would propose to reopen areas closed by final action on the proposed alternative. The ERWC and Eagle County are currently engaged in research and baseline data collection on watershed resource values in legally available areas closed through management decision by the proposed action.

Thank you for the opportunity to comment. For more information please contact our Director of Policy and Planning Tambi Katieb, with any questions at Katieb@erwc.org.

Sincerely,



Melissa Macdonald, Executive Director
Eagle River Watershed Council

Cc: Susan Pollack, Board Chairman, Eagle River Watershed Council
Cliff Simonton, Senior Planner, Eagle County