



PO Box 1283
Paonia, CO 81428

November 24, 2021

Grand Mesa, Uncompahgre, and Gunnison National Forests

Attn: Plan Revision Team

2250 Highway 50

Delta, CO 81416

Submitted via: Online comment portal: <https://cara.ecosystem-management.org/Public//CommentInput?Project=51806>

Dear GMUG Planning Team,

Citizens for a Healthy Community (CHC) respectfully submits the following comments on the GMUG's Draft Plan and Draft Environmental Impact Statement. CHC hereby supports the comments submitted by High Country Conservation Advocates, Western Slope Conservation Center, San Juan Citizens Alliance, Wilderness Workshop, et al. and submits additional specific comments regarding local warming of the GMUG lands and watersheds. While the Draft Plan seeks to adapt to climate change with various forest management scenarios, CHC is deeply concerned that local warming of GMUG lands and watersheds is not specified as a standard governing leasing of oil and gas minerals.

Within the planning area, the impacts of climate change are already being felt to a disproportionate degree. Nine of the eleven counties that comprise the GMUG planning area have already warmed an average 2.1°C.¹ Specifically, GMUG-managed lands within the North Fork of the Gunnison Watershed, which is the headwaters region for the Gunnison River Basin, have warmed an average of 1.78°C.² The Gunnison River Basin is the largest contributor to the Colorado River. For every degree of Celsius warming, the Colorado River declines nearly 10%.³ The Colorado River has lost 32 million acre feet – a 19 percent decline – in the last 22 years, as a result of climate change.⁴ The Colorado Warming Map

¹ Source: Washington Post 2019 - 2020 series, "2°C: Beyond the Limit." Data available at: <https://github.com/washingtonpost/data-2C-beyond-the-limit-usa>, 7/2/2021.

² <https://github.com/washingtonpost/data-2C-beyond-the-limit-usa>

³ Udall, B. and J. Overpeck. The twenty-first century Colorado River hot drought and implications for the future, *Water Resour. Res.*, 53, 2404– 2418, (2017). <https://doi.org/10.1002/2016WR019638>

⁴ Brad Udall presentation, October 1, 2021 at the Colorado River District 2021 Annual Seminar. <https://www.coloradoriverdistrict.org/2021-seminar/>

identifies local warming by county, watershed, and oil and gas producing counties.⁵ Curiously, the oil and gas producing counties are those that have warmed double the global average.

The International Energy Agency (IEA), the international organization that provides guidance on energy policies to countries around the world, has historically been a dominant force in promoting fossil fuel development. However, in its May 2021 report *Net Zero in 2050: A roadmap for the global energy system*, the IEA firmly reversed course. The report states that in order to tackle the climate crisis the “total transformation of the energy systems that underpin our economies” is required. Most importantly, the report concluded that “No fossil fuel exploration is required...as no new oil and natural gas fields are required beyond those that have already been approved for development”.⁶

The Forest Service must acknowledge the impact that local warming is having on the Colorado River Basin and GMUG-managed lands both within and beyond the planning area. Given the large number of issued but undeveloped leases on federal lands, there is simply no room for expanded production and its exacerbation of existing climate change impacts. The Forest Service must acknowledge this reality through new standards for Leasable Energy and Minerals that ensure:

1) new oil and gas mineral leases are not issued in areas that have already warmed 1.5 degrees Celsius. Notably, the Ranger Districts have warmed as follows⁷:

- Norwood 2.29°C
- Paonia 1.79°C
- Gunnison 1.25°C⁸
- Ouray 2.28°C
- Grand Valley 2.23°C

2) new oil and gas mineral leases are not issued in areas with currently undeveloped existing federal oil and gas leases

The key mission in the 1897 Organic Administration Act⁹ places front and center the three original purposes for the U.S. Forest Service:

⁵ Colorado Warming Map available at: tinyurl.com/COwarming

⁶ International Energy Agency, *Net Zero in 2050: A roadmap for the global energy system*, May 2021, available at: <https://www.iea.org/reports/net-zero-by-2050>

⁷ Source: Washington Post 2019 - 2020 series, "2 °C: Beyond the Limit." Data available at: <https://github.com/washingtonpost/data-2C-beyond-the-limit-usa>, 7/2/2021.

⁸ Warming is highest in the western portion of the GMUG, the Gunnison Ranger District is the eastern most part of the GMUG and the portion of the Gunnison Ranger District that is in Gunnison County (which has warmed an average of 1.5°C) is also in the eastern part of the county.

⁹ 16 U.S.C.473 et seq.

“No national forest shall be established, except to improve and protect the forest within the boundaries, or for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the United States...”

Oil, gas, coal, and other mineral uses are not mentioned here, nor in the Multiple Use Sustained Yield Act of 1960.¹⁰ In fact, the GMUG’s continued allowance of these uses serves to undermine sustainable water flows, through the climate change impacts for which these industries are responsible.

In fact, the DEIS’s statement assessing the sustainability of energy and mineral resources and uses that “All action alternatives would contribute to economic sustainability at various scales” is increasingly unsupportable. Record fires, record drought, record heat, etc. are all destabilizing economic sustainability at multiple scales.

We urge the Forest Service to adopt new standards as outlined above for governing oil and gas mineral leases that focus on preventing climate change forcing activities on GMUG lands, not simply mitigating the damage already caused and that would be caused if new leases are issued and developed.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Natasha Léger', with a horizontal line underneath.

Natasha Léger
Executive Director

¹⁰ 16 U.S.C. 528-531.