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January 16, 2023

Doug Vilsack, Director
Colorado State Office
U.S. Bureau of Land Management
2850 Youngfield St.
Lakewood, CO 80215
Via email: BLM_CO_Thompson_Divide@blm.gov

RE: Notice of Proposed Withdrawal and Public Meeting, Thompson Divide Area

Dear Director Vilsack,

Citizens for a Healthy Community (CHC) respectfully submit these comments in response to the *Notice of Proposed Withdrawal and Public Meeting, Thompson Divide Area, Colorado* published in the Federal Register on October 17, 2022 (87 Fed. Reg. 62878). We strongly support the proposed 20-year administrative withdrawal in the Thompson Divide Area of approximately 224,793.73 acres, including National Forest System lands, BLM- managed public lands, and Federal mineral interest (as illustrated in the Thompson Divide withdrawal map dated September 15, 2022 in Attachment A), to protect agricultural, ranching, wildlife, air quality, recreational, ecological, and scenic values. We hereby endorse the comments submitted by Wilderness Workshop, et. al, regarding the Agency's authority to withdraw these lands and minerals, the unique resources, environmental and ecological imperative for withdrawal, and gaps in existing protective designations and roadless areas with respect to mineral leasing and development. We also hereby endorse the comments submitted by Colorado Farm and Food Alliance, et. al regarding the uniqueness of the North Fork Valley and importance of protecting the contiguity of the North Fork of Gunnison watershed.

CHC is a nonprofit organization of over 500 members, based in Paonia, CO, dedicated to protecting the air, water and foodsheds of the Delta County region from the impacts of oil and gas development and paving the path to a clean and renewable energy future. CHC represents farmers, business owners, ranchers, vintners, recreationalists, outfitters,

realtors and more. Our community has been fighting for over a decade to protect the North Fork Valley from new oil and gas leasing and development. Our comments focus specifically on the climate crisis facing public lands in the Thompson Divide Area and the North Fork Valley.

Western Colorado has been disproportionately impacted by climate change and is the nation’s climate hotspot, having warmed more than 2 degrees Celsius, double the global average. The counties in the Thompson Divide Area have warmed an average of 1.7°C. See Table 1 and Map 1.¹ Neighboring Delta County has seen more extreme warming at an average of 2.1°C.² The Colorado River Basin and the Gunnison River Basin have warmed 1.5°C and 2.1°C, respectively, See Map 2. The Gunnison River is the second largest tributary 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 viability of Lake Mead and Lake Powell, which provide the water necessary to power the Glen Canyon and Hoover hydroelectric dams, along with the water supplies for 40 million people all depend on the Colorado River.

Table 1: Thompson Divide Area & North Fork Valley Counties Average Warming 1895-2019	
Delta County*	2.1°C
Garfield County**	2°C
Gunnison*	1.6°C
Pitkin**	1.4°C
*Gunnison River Basin counties ** Colorado River Basin counties	
<p><i>Source 2°C: Beyond the Limit, Washington Post Pulitzer Prize winning series, which analyzed warming between 1895 and 2019. Data available at: https://github.com/washingtonpost/data-2C-beyond-the-limit-usa</i></p>	

¹ Eilperin, Juliet, “2°C Beyond the Limit: This giant climate hot spot is robbing the West of its water,” The Washington Post, August 7, 2020 available at: <https://www.washingtonpost.com/graphics/2020/national/climate-environment/climate-change-colorado-utah-hot-spot/>

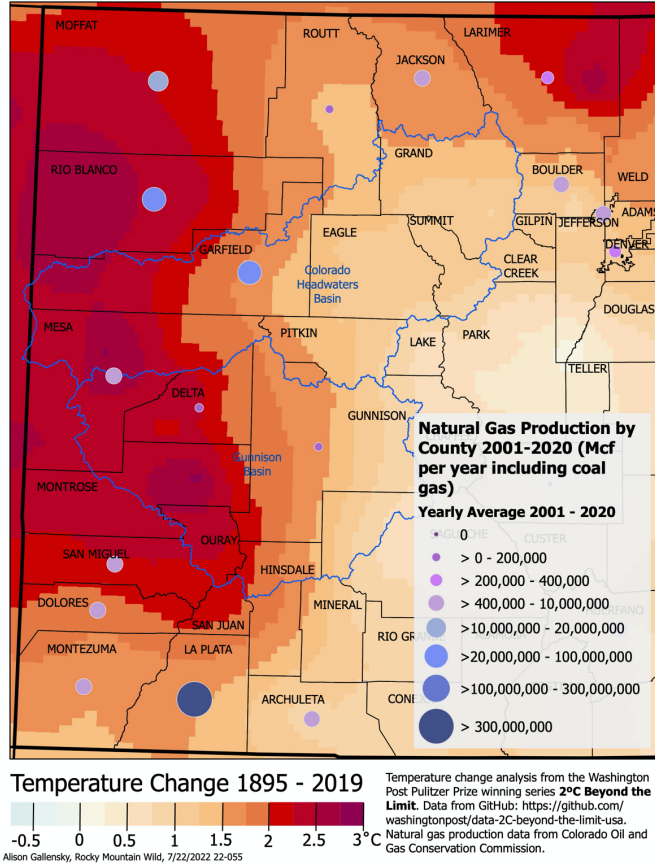
² Id.

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. available at <https://www.youtube.com/watch?v=JAqFegDhXs4>, beginning at time-stamp 49:16.

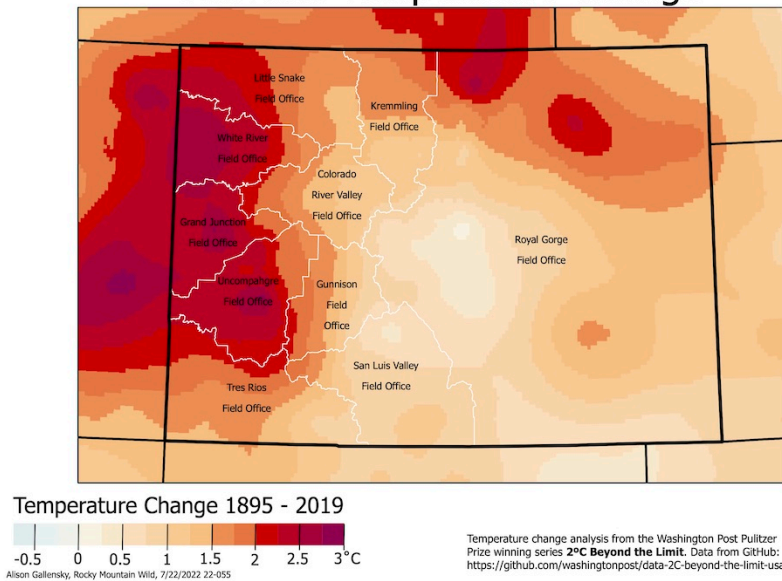
Map 1:

Western Colorado Temperature Change



Map 2:

Colorado Temperature Change



The North Fork of Gunnison Watershed, and BLM and USFS managed lands within the watershed have warmed an average of 1.8°C, 1.9°C, and 1.8°C, respectively. These lands have already dangerously exceeded the global threshold of irreparable damage. Half of the oil and gas producing counties in western Colorado have warmed more than 2°C, and the remaining half has already warmed more than 1.5.⁵ These warming levels emphasize the importance of this proposed administrative withdrawal to protecting the water resources that support the life-sustaining ecosystem for plants, people and wildlife. New oil and gas leasing and development over the next 20 years will only accelerate climate and ecological degradation, derail State Greenhouse Gas Emissions reduction targets, along with State laws, regulations and policies to prioritize the protection of public health, safety, welfare, the environment, and wildlife.

In conclusion, the proposed administrative withdrawal for the Thompson Divide Area is necessary and urgent.

Respectfully,



Natasha Léger
Executive Director

⁵ *Colorado Warming and Gas Production Map* available at: tinyurl.com/COWarming

