

June 16, 2023

Anthony Edwards, Deputy Forest Supervisor
Grand Mesa, Uncompahgre and Gunnison National Forests
2250 South Main Street
Delta, Colorado 81416

Submitted via portal: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=63679>.

RE: Notice of Proposed Withdrawal, Thompson Divide Area

Dear Mr. Edwards,

Citizens for a Healthy Community (CHC), Colorado Farm and Food Alliance, Valley Organic Growers Association, and Western Slope Conservation Center respectfully submit these scoping comments regarding the proposed 20-year administrative withdrawal of approximately 225,000 acres in the Thompson Divide Area.¹ We strongly support the proposed 20-year administrative withdrawal in the Thompson Divide Area, 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 1), to protect agricultural, ranching, wildlife, air quality, recreational, ecological, and scenic values. We hereby incorporate by reference the January 16, 2023 comments CHC submitted and the January 13, 2023 letter submitted by Colorado Farm and Food Alliance, et al to the Bureau of Land Management (BLM) in response to the *Notice of Proposed Withdrawal and Public Meeting, Thompson Divide Area, Colorado* published in the Federal Register in October. 87 Fed. Reg. 62878 (Oct. 17, 2022). See Attachment 2 and 3. In addition, we support the scoping comments submitted by Wilderness Workshop, et al. Our comments focus specifically on the climate crisis facing public lands in the Thompson Divide Area and the North Fork Valley.

Citizens for a Healthy Community (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.

Colorado Farm & Food Alliance (COFFA) is a Delta County based nonprofit organization which works to educate about the state's agricultural land legacy, to promote greater food security, and to develop leadership in support of sustainable and equitable farms and food systems, land and water conservation, and climate action.

Valley Organic Growers Association (VOGA) represents over 125 small- and medium-sized farmers in the North Fork Valley of western Colorado. This thriving agricultural community provides high-quality food and other agricultural products to markets all around the state, and creates a vibrant agritourism economy that supports the valley. Our farms and businesses rely on

¹ See U.S. Forest Service project website for the proposed Thompson Divide withdrawal, <https://www.fs.usda.gov/project/?project=63679> (last accessed June 14, 2023).

clean water, clean air, and the bucolic setting we live in to maintain our reputation for farm-fresh, nutritious, flavorful food, and we strive to preserve our unique place and economy.

Western Slope Conservation Center, based in the North Fork Valley, builds an informed and engaged community to protect and enhance the lands, air, water, and wildlife of the Western Slope. WSCC is a 600+ member grassroots organization with a focus on public lands advocacy, watershed stewardship, and environmental education. Founded in 1977, the WSCC has a 40+ year history of engaging with BLM and USFS on public lands management issues across the western slope of Colorado.

In February 2023, the Colorado Farm and Food Alliance published *Gunnison River Basin: Ground Zero In The Climate Emergency*.² The report describes the signs of climate change in the Gunnison River Basin, including temperature changes and rising atmospheric carbon dioxide. It also highlights the impacts on the region of climate change including, loss in water quantity and quality, extreme weather, wildfire, flooding, human health and impacts to plant, animal and land health. The report finds that the indicators for the Gunnison River Basin are all flashing red, and are ground-zero for climate change impacts on the Western Slope of Colorado.

Recent climate changed-induced events in Delta and Gunnison County reinforce the necessity and urgency of this proposed administrative withdrawal. The 2022-2023 winter season experienced unusually high snowfall, which resulted in rapid high-volume runoff due to higher temperatures in the Spring. The following infrastructure damage was a direct result of Delta and Gunnison County warming faster than the national and global average.

- According to Delta County, in late April, 4 days before the Highway 133 collapse a few miles north, a landslide occurred on Hubbard Creek Rd, which submerged the road and closing it indefinitely. According to the US Geological Survey, with climate change and speed of the spring runoff, like we just experienced in 2023, landslide activity will increase.³
- On May 3, 2023, a 10-foot-wide section of Highway 133 collapsed at Bear Creek Road, between Paonia and Somerset when high water pushed a failed culvert down the hillside.⁴ While the rusty culvert was identified as needing repair in 2020, it was the rapid runoff resulting from climate change, including abnormally high snowfall and rapid melt from early high temperatures that forced rushing water to destroy the roadway. The highway has been closed for six weeks as of the date of this letter and if it reopens as anticipated with a temporary bridge by the end of June 2023 it will have been closed for nearly 2 months. According to the Colorado Department of Transportation, the temporary bridge to reopen the highway will cost an estimated \$1.9 million. Permanent repair will occur later in the summer or fall and will incur additional

² Lauren Traylor and Pete Kolbenschlager, *The Gunnison River Basin: Ground-Zero In The Climate Emergency*, The Colorado Farm and Food Alliance, (February 2023), available at <https://www.colofarmfood.org/groundzero>

³ Dennis Webb, "Speed of spring runoff can affect risk of seasonal landslides," *Grand Junction Sentinel*, June 1, 2023, available at: https://www.gjsentinel.com/news/speed-of-spring-runoff-can-affect-risk-of-seasonal-landslides/article_7c42e7f4-ff2a-11ed-a662-b3ea2ab9db78.html

⁴ Dave Marston, *Rushing water closes a highway in Western Colorado*, Writers on the Range, (June 5, 2023), available at: <https://writersontherange.org/rushing-water-closes-a-highway-in-western-colorado/>; Rick Allen, *Mudslide, sinkhole on 133 product of increased runoff*, Aspen Daily Times, (May 5, 2023), available at: https://www.aspendailynews.com/news/mudslide-sinkhole-on-133-product-of-increased-runoff/article_0f285b82-eb06-11ed-9b7d-a70681ee5542.html; Attachment 4: photos of Highway 133 collapse; Attachment 5: photos of Kebler Pass road collapse.

significant cost. The closure of the highway has had a devastating economic impact on small businesses, farmers, and ranchers in the North Fork Valley.

- Multiple substantial washouts have occurred on Grand Mesa, Uncompahgre and Gunnison National Forests' Paonia Ranger District, making motorized travel impossible on several National Forest System Roads. For example, on May 24, 2023 fast runoff washed out the seasonal Kebler Pass Road. A portion of the road collapse, making the through traffic between the North Fork Valley and Crested Butte along the scenic byway impassable. As of the date of this letter, there is no estimated date for reopening the road.⁵

In conclusion, we strongly support the proposed 20-year administrative withdrawal for the Thompson Divide Area as urgent and necessary. We encourage the US Forest Service to look at all of the support built to protect the Thompson Divide and the North Fork Valley from oil and gas development and finalize this mineral withdrawal for the full twenty years. This area is of incredible importance to us in the North Fork Valley, and to see it withdrawn from oil and gas development would ensure that the ecosystem upon which we depend is protected for future generations.

Respectfully,



Natasha Léger
Executive Director
Citizens for a Healthy Community
PO Box 1283
Paonia, CO 81428

s/Ben Katz
Public Lands Program Director
Western Slope Conservation Center
PO Box 1612
Paonia, CO 81428

s/Pete Kolbenschlag
Director
Colorado Farm & Food Alliance
P.O. Box 641
Paonia, CO 81428

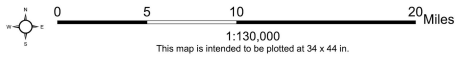
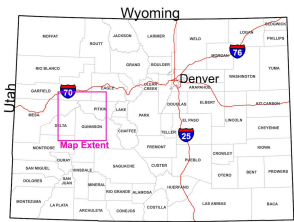
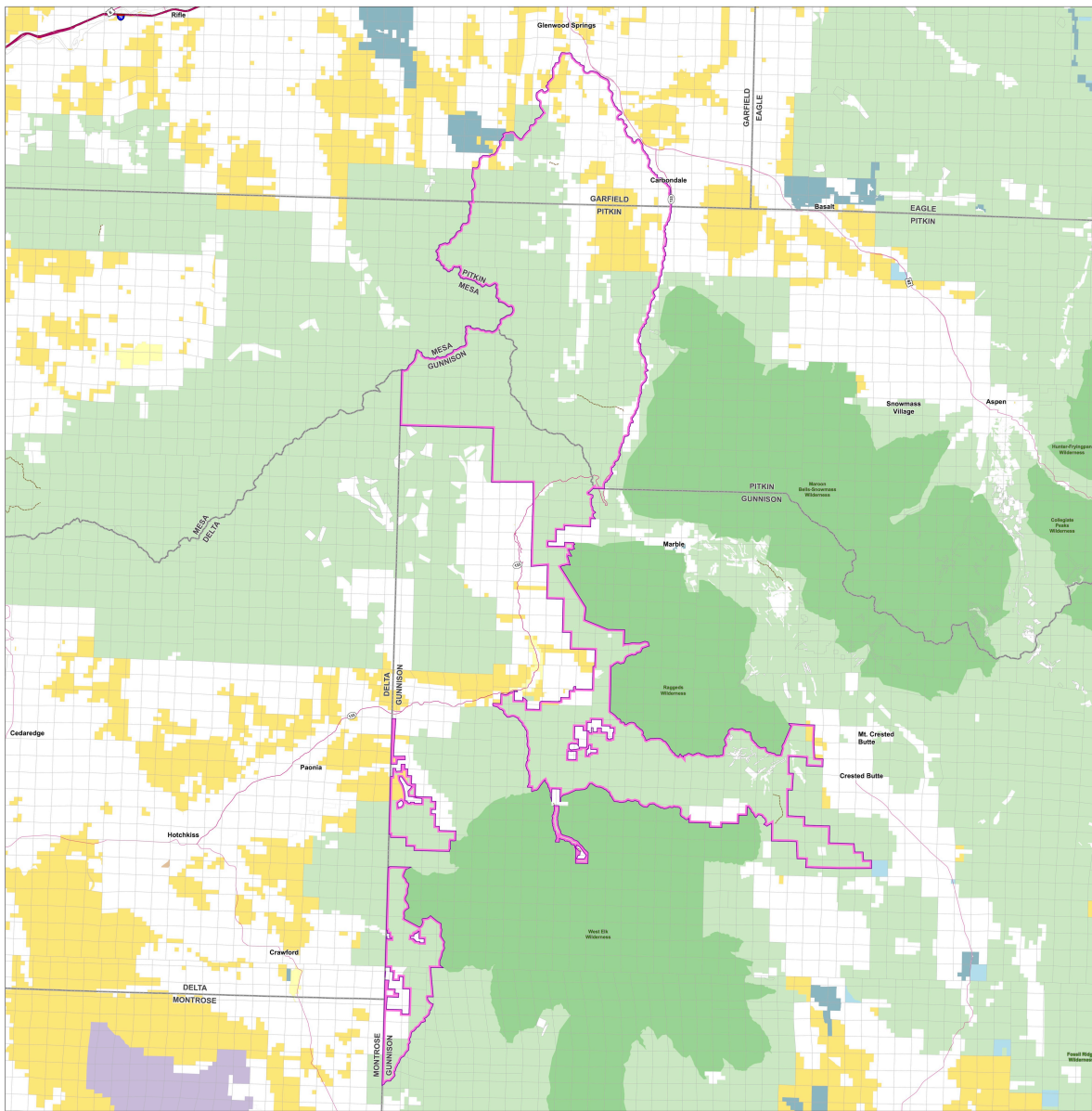
s/Mark Waltermire
Board member
Valley Organic Growers Association
PO Box 1423
Paonia, CO 81428

⁵ Marston; Spring Conditions Create Temporary Road Closures, US Forest Service, May 26, 2023, available at: <https://www.fs.usda.gov/detail/gmug/news-events/?cid=FSEPRD1110025>; Katherine Nettles, Still no opening date for Kebler Pass Road, Crested Butte News, June 14, 2023, available at: <https://crestedbuttenews.com/2023/06/still-no-opening-date-for-kebler-pass-road/>

Attachment A

Proposed Thompson Divide Area Withdrawal

September 15, 2022



- Proposed Thompson Divide Area Withdrawal
 - County Boundaries
 - Township Sections
 - Interstates
 - U.S. Highway
 - State Highway
 - Other Roads & Routes
-
- Land Ownership**
- Bureau of Land Management
 - Bureau of Reclamation
 - National Park Service
 - Other Federal
 - Private
 - State
 - State, County, City; Areas
 - US Forest Service
 - USFS Wilderness Area

NOTE TO MAP USERS
 The data presented on this map are preliminary and subject to change. The map is intended to be plotted at 34 x 44 in. at a scale of 1:130,000. The map is intended to be plotted at 34 x 44 in. at a scale of 1:130,000. The map is intended to be plotted at 34 x 44 in. at a scale of 1:130,000.

Attachment 2



PO Box 1283
Paonia, CO 81428

Phone: 970-399-9700
www.chc4you.org

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 <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>	

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/>

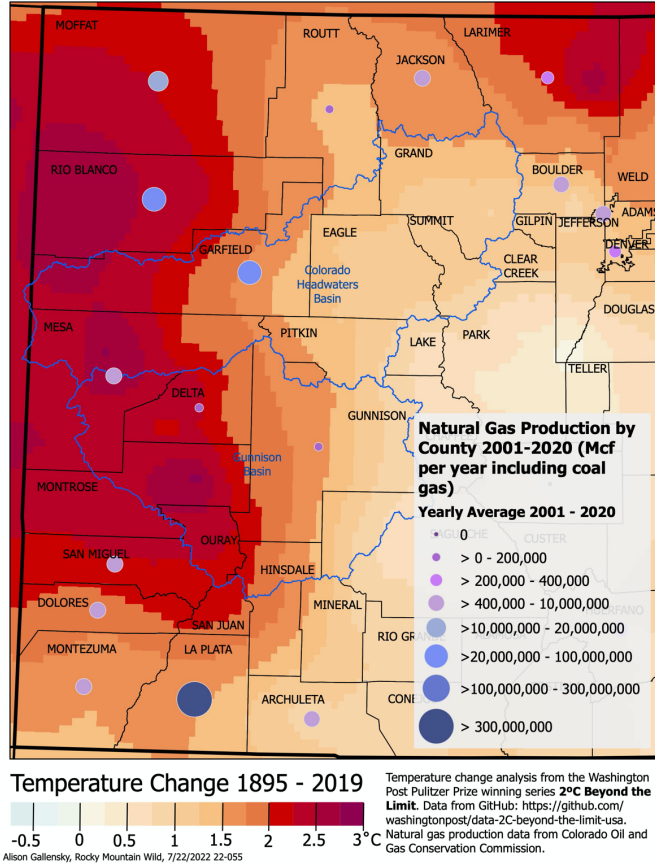
² Id.

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.

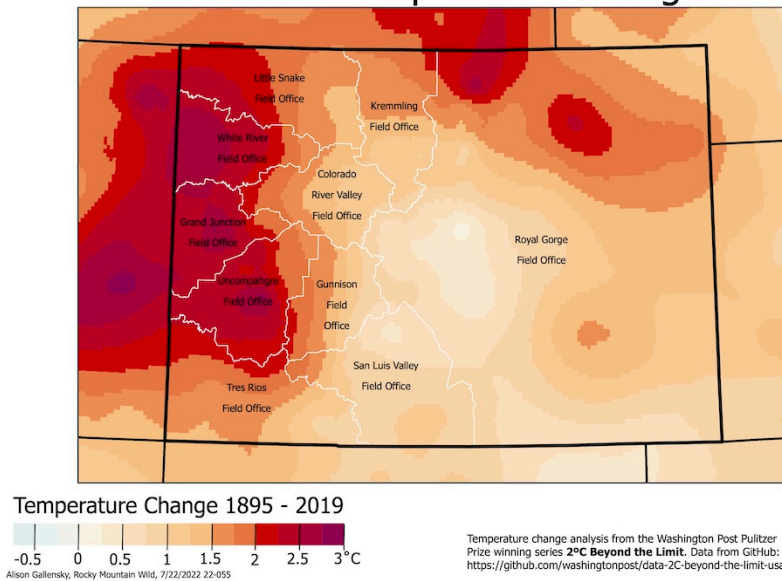
Map 1:

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

Attachment 3



January 13, 2023

Douglas J. Vilsack, Director
Colorado State Office
U.S. Bureau of Land Management
2850 Youngfield St.
Lakewood, CO 80215

RE: Support for Thompson Divide Administrative Mineral Withdrawal

Dear Director Vilsack:

Over one hundred years ago, in 1904, a federal employee submitted a report about the Gunnison Forest Reserve, which like much of the area now comprising public lands in and around the Thompson Divide area was an early component to the nascent national forest system. That [report](#) noted the importance of the headwaters lands to the downstream communities, especially for agriculture in the North Fork Valley.

"The value of the forest as a protection cover is clearly shown by the experience of the people of the North Fork Valley. Several years ago the ditches...became very short in their supply. The fruit growers...found that the [sheep]herders...were setting a great many fires that destroyed the forest cover... This expensive object lesson thoroughly convinced the farmers and fruit growers of the importance of forest cover to prolong stream flow..."

That report then concluded:

"In view of the evidence that the success of the fruit industry of the North Fork Valley and that of the Gunnison Tunnel Project depend on the preservation of the forest growth on the watershed of the Gunnison River... It is strongly recommended that the proposed Gunnison Forest Reserve be established, the boundary thereof to be as shown on the accompanying map."

In that tradition these comments are submitted by the Colorado Farm & Food Alliance, a Delta County based nonprofit organization which works to educate about our state's agricultural land legacy, to promote greater food security, and to develop leadership in support of sustainable and equitable farms and food systems, land and water conservation, and climate action.

And by the Western Slope Conservation Center, a 600+ member organization that is based in the North Fork Valley and builds an informed and engaged community to protect and enhance the lands, air, water and wildlife of the Western Slope of Colorado. The Conservation Center has a 40+ year history of working to ensure our public lands and waters are well-managed with the highest level of protection they deserve.

And by the Valley Organic Growers Association with a mission to promote local sustainable agriculture by supporting and educating producers and consumers. VOGA is a nonprofit membership organization founded in 1992 in the North Fork Valley whose membership consists of over 80 local farmers, ranchers, vintners, and orchardists, and over 100 chefs, local businesses and individuals who support its mission. VOGA envisions a vibrant community of prosperous, local farms that sustain and benefit the land by providing healthy agricultural products.

Comments in support of Thompson Divide Administrative Mineral Withdrawal: Colorado Farm & Food Alliance, Western Slope Conservation Center, Valley Organic Growers Association

Together our groups have a long established history in the North Fork Valley, in Delta County, and in western Colorado. Our organizations have commented on agency projects and plans, and have met with agency officials to bring forward issues and concerns. We appreciate your consideration of our input here.

Some of the public lands in the Thompson Divide area under consideration for this withdrawal lie in the headwaters of the North Fork and other tributaries to the Gunnison River. And it is these lands in particular that we are writing about, lands long tied directly to agriculture in western Colorado.

A decade ago our groups and many residents that live, work, recreate and rely on, in and around these same lands being considered for this withdrawal, lands that those early orchardists advocated for, and the very same downstream communities, were again making their case, compelled to protect these and other public lands from new oil and gas leasing. That has led to lawsuits and successful challenges to that activity here. But the residents of the North Fork Valley remain vigilant as they have since these forests were first reserved, in part to secure and safeguard their water supplies.

So first, we want to thank the Department of Interior for its consideration of the long-term protection of these public lands and their habitat and natural resources through an administrative mineral withdrawal from mining and oil and gas development, which we support.

However, we also believe that the agency should apply due consideration to all public lands when it considers the potential for their industrialization, within the Thompson Divide area, across the North Fork watershed, including in Delta County, and elsewhere. Fossil fuel extraction from public lands is a major source of the pollution driving climate change, damages habitat, and can put our water supplies at risk.

The North Fork Valley in Gunnison and Delta counties is an area in transition, firmly rooted in its agricultural heritage but diversifying out of its coal-mining past. Business activity has changed over the past few decades. Now more than a dozen wineries, local markets and dining that feature valley products, are a driving force of the economy.

Few here see fossil energy extraction as the North Fork Valley's economic future and many view oil and gas activity as a direct threat to it. Existing oil and gas leases should not be extended, and once expired, these and other public lands should be considered for similar protections as those included in the current proposal. Decisions that protect and support local agriculture here support a much broader economy than farms only, as well as this overall shift toward a more economically, and environmentally, resilient future.

The Southwest is already bearing the brunt of climate change. The Colorado River System teeters on the brink of collapse bringing unforeseeable but likely severe consequences to communities and enterprise, including agriculture, across seven states and beyond. The agency should consider cumulative impacts of all oil and gas projects and if further expansion of this activity is still appropriate for any public lands.

Parallel with the climate crisis the world is watching a cascading loss of the planet's species. This loss of biodiversity jeopardizes Colorado agriculture, including the orchard fruits for which the North Fork Valley is renowned. Protecting public lands and the habitat and connectivity they provide is to protect life itself.

The lands included in the Thompson Divide Mineral Withdrawal, and other adjacent and proximate public lands in the region, provide critical habitat and vital migration links for wildlife and for numerous plant, animal and other species. If there were ever any lands to protect for their value as habitat, it would be places like the Thompson Divide, the North Fork Valley and the surrounding landscapes.

Comments in support of Thompson Divide Administrative Mineral Withdrawal: Colorado Farm & Food Alliance, Western Slope Conservation Center, Valley Organic Growers Association

Since the earliest days of settlement in the North Fork Valley, and the agriculture that came with it, protecting the water source areas in the forests above the farms and orchards has been a key concern for residents. But the other qualities of this landscape were not lost on these practical-minded settlers and townspeople either. Tourism, stunning vistas and abundant wildlife have also long been an attraction of the area, as another early government [report](#) shows.

For all these reasons, our organizations support the Thompson Divide Mineral Withdrawal which will benefit the businesses, residents, and farms of the North Fork Valley, and which will provide numerous conservation, wildlife, and climate benefits as well. We continue a more than one-hundred year history calling for the protection of these public lands, their watersheds, backcountry areas, and wildlife habitat.

In closing, we want to draw the agency's attention to the following in support of this mineral withdrawal:

- For at least two decades communities around the Thompson Divide, the North Fork Valley and the broader Gunnison and White River National Forests region have called for management of this cherished landscape to prioritize its vital ecosystem and habitat values and its public uses.
- Biologically, these lands connect large tracts of public lands important to our nation's wildlife, for their climate adaptation and for species recovery. Streams shelter native fish, and moose, elk, deer, lynx, bear, cougar and numerous other species rely on these lands for their survival.
- The watersheds these lands protect are critical to farming and ranching operations in the valleys that drain them, to Colorado towns and cities, and to millions of other downstream Americans.
- The West Elk Scenic Byway, which connects the area, is a testament to the importance of these lands to tourism and outdoor recreation. The aspens and wildflowers are world famous and help drive a multi-million dollar industry along with hunting, fishing, rafting, skiing, and jeep excursions.
- Delta County has Colorado's highest concentration of organic farms and one of the highest concentrations in the nation. VOGA producers contribute over \$3,000,000 into the local economy annually – through wages and purchases – and earn over \$4,000,000 in sales.
- Over 15% of VOGA member-producers' revenue is estimated to come from agritourism activities, according to a survey of its members.
- Industrialization of the area's public lands and water source-areas jeopardizes the area's organic agriculture and its agritourism activities; creates conflicts with and can displace outdoor recreation including hunting; and creates uncertainty for local businesses including wineries and other tourism-based endeavors.

Finally, we note that a [recent study](#) from the Colorado Fiscal Institute shows that less than 1% of the state's employment is in the oil and gas industry. And, we note also that the watersheds which encompass and surround the Thompson Divide area including the Gunnison River provide some of the largest flows in the Colorado River System, upon which 40 million Americans, 16 Tribal nations, Mexico, and billions of dollars in agriculture and other enterprise depend.

We believe that these cherished lands, this high quality habitat and vital national headwaters, should be managed for their long-term viability and conservation, which easily overrides whatever marginal gas resource might exist there. And which climate science tells us that we should not be developing.

So, we also wish to again restate the case for protecting all these critical watershed lands by ending their availability for oil and gas and other fossil fuel development, that all the public lands in the North Fork watershed deserve to be protected from the threat of future mineral speculation, mining, and fracking.

Comments in support of Thompson Divide Administrative Mineral Withdrawal: Colorado Farm & Food Alliance, Western Slope Conservation Center, Valley Organic Growers Association

And, as the agency plans future public outreach in preparation of its analysis for the Thompson Divide Mineral Withdrawal, we request that public meetings also be held in the North Fork Valley, as the withdrawal will have significant impacts to the area's farms, towns, and residents.

In any case, we support inclusion of all the public lands and minerals currently being considered for the Thompson Divide Administrative Mineral Withdrawal. And we will continue our work to secure additional protections for all the region's deserving public lands.

Sincerely,



Pete Kolbensschlag, Director
Colorado Farm & Food Alliance



Ben Katz, Program Director
Western Slope Conservation Center



Kristin Just, Board President
Valley Organic Growers Association

Cc: Secretary Deb Haaland, U.S. Department of Interior
Director Tracy Stone-Manning, U.S. Bureau of Land Management
U.S. Senator Michael Bennet
U.S. Senator John Hickenlooper
U.S. Representative Lauren Boebert
U.S. Representative Joe Neguse
Delta, Gunnison, Garfield, Pitkin Boards of County Commissioners

Attachment 4

Highway 133 Road Collapse Photos



Photo courtesy of Colorado Department of Transportation. The photo above shows road damage on Colorado Highway 133. Photo taken Monday, May 15.



Courtesy photo/CDOT

Colorado Highway 133 collapsed between Paonia and Somerset May 3 when the culvert below failed and opened what CDOT called a sinkhole.

Attachment 5

KEBLER PASS WASHOUT PHOTO



Photo courtesy of Gunnison County. Kebler Pass washout.