



June 16, 2023

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

Elysia Retzlaff, Project Manager
Elysia.Retzlaff@usda.gov

Re: Scoping Comments for the Proposed Thompson Divide Mineral Withdrawal

Dear Deputy Forest Supervisor Edwards:

Please accept these comments on behalf of High Country Conservation Advocates (HCCA) in response to the United States Forest Service (USFS) scoping period on the proposed Thompson Divide Mineral Withdrawal.

I. Introduction & Background

On January 13th, 2023 HCCA submitted comments to the State Director of the Bureau of Land Management (BLM), Doug Vilsack. We were joined in these comments by a number of other entities, including: The Wilderness Society, Colorado Mountain Club, Rocky Mountain Wild, EcoFlight, Rocky Mountain Recreation and Wildlife Initiative, American Whitewater, Great Old Broads for Wilderness, INFORM, Center for Biological Diversity, and Rocky Smith. The USFS has assured stakeholders that comments submitted during the BLM's scoping period will be incorporated into the scoping period by the USFS. We hereby request that comments submitted to the BLM previously be formally incorporated into the record.

If the proposed withdrawal is approved, the Secretary of the Interior will issue a public land order and over 200,000 acres of National Forest System lands will be withdrawn from location, entry, and patent under the mining laws; and operation of the mineral leasing, mineral materials, and

geothermal leasing laws. Below we provide additional information on the resources that would be protected if the proposed withdrawal is approved. We focus on the local economies and water quality that would be protected by the prevention of new mining activities in our headwaters.

The withdrawal area includes a large portion of the headwaters of the Gunnison River. Because activities in the headwaters impact downstream communities, the area immediately downstream from the withdrawal would also benefit from avoided impacts to water quality (the Upper Gunnison basin above the Blue Mesa Reservoir). The Raggeds Wilderness Area and the West Elk Wilderness Area are both south of Kebler pass and adjacent to the proposed withdrawal area. Impacts to these areas are also addressed.

Approving the withdrawal would avoid disturbances caused by mineral exploration and development activities within the designated area. It would allow for all activities currently consistent with the forest plan and applicable laws and regulations, including public recreation and other Forest Service management activities (e.g., timber harvest, grazing). Because the proposed action would prevent new mineral development activities, these comments focus on the value of the resources that would be protected by avoiding new mining activities. To that end, we provide examples of impacts from past mining activities in this area to demonstrate how mining in our headwaters can impact our economy and water quality.

There continues to be broad and far-reaching support to prohibit new mining activities in our headwaters. HCCA is including an attachment with approximately 150 new sign-ons (electronic and in-person) in support of the proposed withdrawal (Attachment A: Written and Electronic Support).

II. Economic Considerations

This section briefly describes economic activities directly within the withdrawal area as well as in the adjacent communities which rely on the water, wildlife, and public lands resources stemming from the proposed withdrawal area. The closest municipality to the withdrawal area is the Town of Crested Butte, which sits immediately east of the proposed withdrawal area. Many economic activities in Crested Butte and the greater Gunnison Valley depend on public lands.

Crested Butte was incorporated in 1880 as a mining camp.¹ During early years Crested Butte's economy was primarily based on mining activities. In 1894 Big Mine opened in downtown Crested Butte, becoming the third largest coal mine in Colorado by 1902.² During the mid-1900s the local economy began to transition away from mining. In 1952 Big Mine closed.³ The ski area opened in 1960, attracting a new type of recreational economic development to the area.⁴ In the modern era our region's unique natural amenities and recreational opportunities on public lands have been the source of a strong recreation and tourism-based economy for Crested Butte.

¹ Crested Butte Community Compass: Navigating Crested Butte's Future. November 7, 2022. Attachment B: Crested Butte Community Compass.

² *Id.*

³ *Id.*

⁴ *Id.*

The Gunnison Valley as a whole also has an economy that depends on access to our public lands and high-quality waters. Ranchers use public lands for grazing activities. Fly-fishing and hunting activities bring in thousands of visitors annually. In January of 2023, the Gunnison River was formally recognized as a Gold Medal Water for its robust trout fishery.⁵ Several of the key natural resource-dependent sectors in the Gunnison Valley are addressed below.

a. Crested Butte Mountain Resort

Crested Butte Mountain Resort (CBMR) is a significant economic driver located just outside of the withdrawal area. In 2011, CBMR employed 102 employees year-round and an additional 1,131 employees seasonally.⁶ In that same year there were 305,290 skier days at CBMR.⁷ While the downhill ski terrain on Mt. Crested Butte is spectacular, visitors are attracted to the area for a holistic experience which includes the views, lodging, dining and retail establishments. While the withdrawal area would not extend to lands directly surrounding CBMR, the ski area has views of the withdrawal area. The development of large-scale mines within miles of the resort would likely impact the resort's status as a renowned ski destination.

b. Tourism Amenities

The Gunnison Valley brings in revenue from a number of tourism dependent sectors, including retail, arts, entertainment, accommodation and food services. The Gunnison Valley has hundreds of resorts, outfitters, guides, campgrounds, and other service businesses designed to accommodate tourism. In 2019, 1,759 people in Gunnison County were employed in the accommodations and food services industry. Like other tourist destinations, Gunnison County also has a strong real estate sector. In 2019, 1,264 people in Gunnison County were employed in the real estate and leasing industry.⁸

c. Recreation

Our surrounding public lands serve as a significant economic asset, providing a nature-based recreation experience that attracts visitors from afar. The West Elk and Raggeds Wilderness areas provide thousands of visitors with a remote and primitive opportunity to explore nature. Visitors that are drawn to the northern part of the Gunnison Valley often use the Town of Crested Butte as a base-camp for hiking, backcountry skiing, snowmobiling, biking and hunting opportunities in the surrounding areas.

⁵ Livingston, John. "Colorado's Newest Gold Medal Waters- Gunnison and Taylor Rivers. Colorado Outdoors. Jan. 18, 2023. Available at <https://coloradooutdoorsmag.com/2023/01/18/colorado-gold-medal-waters-gunnison-and-taylor-rivers/>.

⁶ Page 14, Crested Butte, Colorado Community Profile. January 2022. Published by the Town of Crested Butte at <https://crestedbutte.govoffice2.com/vertical/Sites/%7B6058FFBB-CB06-4864-B42F-B476F794BE07%7D/uploads/Profile0122.pdf>. Accessed on 6/14/2023. Attachment C: Crested Butte Community Profile.

⁷ *Id.* at 27.

⁸ *Id.*

The Outdoor Alliance released a report in November of 2018 that demonstrated that boaters, climbers, hikers, skiers and mountain bikers who visit the Grand Mesa, Uncompahgre, and Gunnison National Forest generate \$392 million in annual visitor spending over 2.6 million visits a year.⁹ In 2018 this created 4,148 full time jobs and resulted in \$112.2 million dollars in wages.¹⁰ The American Sportfishing Association reported that in 2021, anglers from Colorado's Congressional District 3 spent \$159.4 million on fishing-related purchases in Colorado.¹¹ These activities depend on clean waters and healthy habitats in our headwaters.

Recreation is not only an economic driver for the region, it is also a way of life. Residents of the Gunnison Valley bike, trail run, hike, ski, snowmobile, backpack, hunt and enjoy a quality of life enhanced by access to our public lands. There are a number of recreational trails within the proposed withdrawal area. Mining operations on the public lands often shut down access to those areas for safety purposes. In addition to protecting our economy, the withdrawal would preserve high-quality recreational opportunities for our local community.

d. Ranching

Ranching is serious business in Gunnison County. In 2017 the County was home to 309 farms that supported a market value \$18.5 million in livestock and product sales.¹² \$15.8 million of that was in cattle and calf sales.¹³

Mining can have direct impacts on ranching. Our public lands provide additional grazing areas for cattle and help to keep stock growing economically viable. Within the proposed withdrawal area are a number of grazing leases that would be impacted by mining activities. In our previous comments HCCA provided information on how molybdenum in streams has the potential to impact cattle's reproductive health. Reducing the likelihood of mineral development on these lands will protect our agricultural economy.

Our economy is directly tied to activities on the public lands. We encourage the USFS to consider the economic drivers of the Crested Butte economy (as well as the greater Gunnison Valley) in your evaluation of potential impacts that would be avoided by protecting these resources with a mineral withdrawal.

III. Water Resources

Water quality within the proposed withdrawal area varies. South of Kebler Pass a number of streams have been impacted by past mining operations and/or by natural mineralization. In our January 2023 comments to the BLM HCCA noted that a number of streams within the proposed withdrawal area have been identified as eligible for wild and scenic status or designated as outstanding waters by the state of Colorado. The USFS should evaluate the

⁹ The Economic Influence of Human Powered Recreation in the Colorado's Grand Mesa, Uncompahgre, & Gunnison National Forests. Outdoor Alliance. Attachment D.

¹⁰ *Id.*

¹¹ Economic Contributions of Recreational Fishing. Colorado; Congressional District 3; Lauren Bobert. Attachment E.

¹² U.S. Department of Agriculture, National Agriculture Statistics Service. 'County Profile – Gunnison County, Colorado'. 2017. Attachment F.

¹³ *Id.*

benefit that the mineral withdrawal would provide in preventing the degradation of high-quality waters within and originating from the proposed withdrawal area.

In addition to protecting streams with excellent water quality, the withdrawal will also help preserve the progress that our community has made in restoring local streams impaired by historic mining activities. Coal Creek (COGUUG11) is on Colorado's 303(d) list for aquatic life use and macroinvertebrates.¹⁴ Lower down in the watershed Coal Creek is impaired for dissolved Cadmium (below the Keystone Mine discharge).¹⁵ Other impairments in the Coal Creek watershed include for Zinc (Elk Creek).¹⁶ While there is some naturally occurring mineralization in this basin, there are two historic mine operations which have been identified as key contributors to these water quality impairments- the Keystone Mine (located on Mt. Emmons) and the Standard Mine (in the Elk Creek sub-basin).

Our community has created a watershed coalition, the Coal Creek Watershed Coalition (CCWC), to monitor water quality and tackle reclamation projects designed to address sources of impairment.¹⁷ CCWC has completed a number of studies on local watersheds and has identified a number of projects to reclaim past mining operations. Many of these projects have been implemented already, some leading to measurable improvements in water quality. Information about past clean-up efforts was included in our comments to the BLM and can be found in reports compiled by the CCWC. We encourage the USFS to review the following CCWC watershed plans and reports for information about Coal Creek and the Slate River (both have tributaries/headwaters which originate in the proposed withdrawal area):

- Attachment G: Coal Creek Watershed Protection Plan
- Attachment H: Coal Creek Watershed Coalition 2020-2021 Report
- Attachment I: Upper Slate River Watershed Plan Executive Summary

The proposed withdrawal would protect a number of high-quality waters. It would also help to protect the investments that our community and taxpayers have made to improve our water quality by cleaning up impacts from historic mines in our watersheds. The benefits to water quality from preventing additional mining in our headwaters should be fully evaluated by the USFS.

Thank you for your consideration.

¹⁴ REGULATION #93 - COLORADO'S SECTION 303(D) LIST OF IMPAIRED WATERS AND MONITORING AND EVALUATION LIST. 5 CCR 1002-93. Water Quality Control Commission. Colorado Public Department of Health and the Environment. Available at <https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=9662&fileName=5%20CCR%201002-93>

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ CCWC regularly samples several creeks and rivers that receive waters originating from within the proposed withdrawal area. Water quality reports generated by CCWC, the state of Colorado, and by the EPA have characterized impacts from past mining activities and made extensive recommendations for reclamation activities to improve water quality standards.

Respectfully,

A handwritten signature in black ink that reads "Julie Nania". The signature is written in a cursive, flowing style.

/s/

Julie Nania

Water Director

High Country Conservation Advocates,

PO Box 1066

Crested Butte, CO 81224

**Attachment A: Written and Electronic Support
for Withdrawal**

**Attachment B: Crested Butte Community
Compass**

Attachment C: Crested Butte Community Profile

Attachment D: Outdoor Alliance Report

Attachment E: Angling District 3

Attachment F: 2017 Agricultural Census

Attachment G: Coal Creek Watershed Protection Plan

**Attachment H: Coal Creek Watershed Coalition
2020-2021 Report**

Attachment I: Upper Slate River Watershed Plan Executive Summary