

THOMPSON DIVIDE COALITION
OUR HOME. OUR WATERSHED. OUR LIVELIHOOD.

January 13, 2023

Thompson Divide Coalition
PO Box 2045
Carbondale, CO 81623

Doug Vilsack
State Director, Bureau of Land Management
Colorado State Office
2850 Youngfield Street
Lakewood, Colorado 80215

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**Re: Public comment submission regarding
The Thompson Divide Administrative Mineral Withdrawal**

Dear Director Vilsack,

The Thompson Divide Coalition is writing in support of the proposed Administrative Mineral Withdrawal for the Thompson Divide. The Thompson Divide Coalition's aim is to protect the value and productivity of the existing non-mineral resources in the Divide. TDC is a broad-based alliance of ranchers, farmers, hunters, fishermen, recreationists, and businesspeople united in the desire to preserve the unique character and traditional uses of this land.

Existing uses are big business and maintain our Western legacy.

Colorado's Thompson Divide comprises over 220,000 acres of backcountry situated in America's most heavily recreated National Forest, the White River. Described as a "Colorado Crown Jewel" the Divide is home to hunting units that generate over 20,000 big-game licenses each year; summer range for thriving ranching operations; and one of the densest concentrations of inventoried roadless areas in the West. Surrounding communities depend heavily on agriculture and tourism, **and independent economic analysis has shown that the Thompson Divide generates 300 jobs and \$30 million each year in sustainable economic benefits.** In his personal journals, written over a century ago after riding horseback into the Thompson Divide area, President Theodore Roosevelt, our nation's first conservationist President, described the Thompson Divide area as "a great, wild country... where the mountains crowded together in chain, peak, and tableland; all of the higher ones wrapped in an unrent shroud of snow." And to this day, the rugged, pristine character of the Thompson Divide remains largely intact.

Extraction development is incompatible with healthy productive grazing in this area.

Extraction activities would change these characteristics quickly. The non-mineral resources in the Thompson Divide are central to our local economy because they support agriculture, outdoor recreation and tourism. **Ninety-nine percent of the area is allotted for grazing.** The grazing permits have been in use since the passage of the Taylor Grazing Act in 1934 and are vital to the success of local ranching operations. Livestock operations rely on these federal grazing allotments in the Divide to run cattle from early June through mid-October; these operations also preserve thousands of acres of increasingly scarce winter range for deer and elk. The area is so rugged that all the work is still done on horseback.

Hunting and tourism rely on large, undisturbed land parcels.

Aside from grazing, hunting is perhaps the next most valuable activity in the area. Hunting tags for this area routinely sell for \$1000 or more. The Divide is home to hunting units that generate over 20,000 big-game licenses each year; It is a highly sought after and desired permit area. Tourists also travel here to ski at Spring Gulch Nordic Center, to snowmobile from Sunlight to Powderhorn and climb at the Thompson Creek Fins. These tourists then stay in local hotels, eat at restaurants and shop in local stores.

Protecting a known migration corridor is in alignment with the Forest Service Management Plan.

The Thompson Divide area provides critical winter and migration habitat for lynx, elk, deer, moose, bear and mountain lions. It consists of several watersheds providing water to the Crystal, Roaring Fork and North Fork Rivers. Linking wildlands near Grand Junction to the Elk Mountains, it is a known as a critically important migration corridor. Surveys indicate that this area holds perhaps the largest concentration of black bears in the State of Colorado. Colorado Parks and Wildlife has referred to the area as "[the elk factory](#)." Creeks and streams contain one of the state's last remaining genetically pure strains of cutthroat trout. The roadless character of the Thompson Divide is exactly what protects these corridors and habitats. Mineral extraction activities are incompatible with roadless management.

Swift action during the NEPA review process by the Agencies is in alignment with its' past Record of Decision, the Biden Administration's policies and The Forest Service's ongoing management practices for the Divide.

In a 2007 decision, the Interior Department's Board of Land Appeals held that leases in the Thompson Divide were issued in violation of NEPA and the Endangered Species Act. In 2014 the Forest Service issued a Record of Decision regarding the Final Environmental Impact Statement for Oil and Gas Leasing on the White River National Forest. The United States Forest Service's more recent decision to close the Thompson Divide to future oil and gas leasing noted the Thompson Divide's "singularity as a special place," and the outpouring of public and local government support for its protection. The decision is also a clear indication that overwhelming public support for protecting the Thompson Divide can and should carry significant weight under NEPA. BLM has identified its legal authority to void the existing Thompson Divide leases at the conclusion of that NEPA analysis. Today, only a handful of leases remain, but the threat of leasing in the future is possible until an act of Congress is passed to permanently remove the Thompson Divide from leasing. An Administrative Withdrawal is the most viable legal tactic to secure protection for the area.

"It's not that oil and gas drilling shouldn't happen anywhere. It's that oil and gas development shouldn't happen everywhere. Certain places are inappropriate for development, and the Thompson Divide is one of those places."

– Jason Sewell, a 5th generation rancher in the Thompson Divide

This is sensible and defensible federal policy with limited to negligible impacts on future oil and gas leaseholders. We thank the USFS and the BLM for taking up the important work of the NEPA review process as a step towards an approved Administrative Mineral Withdrawal for the Thompson Divide.

Sincerely,

The Thompson Divide Coalition Board

Jason Sewell, Board President

Jason Sewell