

January 13, 2023

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

*Comments submitted via email to [BLM\\_CO\\_Thompson\\_Divide@blm.gov](mailto:BLM_CO_Thompson_Divide@blm.gov)*

RE: Comments on the Bureau of Land Management's Notice of Proposed Mineral Withdrawal for the Thompson Divide Area, Colorado (87 Fed. Reg. 62878)

Dear Director Vilsack,

Please accept the following comments from the National Wildlife Federation and the Colorado Wildlife Federation in support of the Bureau of Land Management's proposed mineral withdrawal for 224,793.73 acres in West Central Colorado known as the Thompson Divide. Instituting the proposed withdrawal would protect an ecologically rich and unique area, conserving some of the finest intact roadless habitat remaining in Colorado. It will also protect important natural resources, including wildlife, clean air, recreational values, and drinking water from the impacts of oil and gas development. Further, the withdrawal would honor local citizens' desires for keeping the area intact and over a decade of local advocacy pursuing withdrawal and permanent protection for the Thompson Divide.

I. The Proposed Withdrawal would conserve and protect important aquatic resources and local water sources.

The Thompson Divide is a coldwater fisheries stronghold and contains several conservation populations of Colorado River cutthroat trout, considered critical to the recovery and maintenance of the species to its native range. Among the 1,550 miles of stream radiating in all directions off Thompson Divide, about 83 miles qualify as native cutthroat stream habitat along with nearly 12 acres of cutthroat lake habitat. Several of these waters are also designated as "outstanding natural waters" by the state of Colorado for their pristine water quality.

The northern boundary of the withdrawal and protection area includes 4.4 miles of Gold Medal fishing water along the Roaring Fork River, and Thompson Divide's headwater tributaries extend to additional high-quality fisheries in the North Fork of the Gunnison River, the Crystal River, and the Colorado River, which supply local communities with drinking water and sustain surrounding retailers, fishing guides and outfitters that help drive the local recreation economy. The Thompson Divide's waters also sustain numerous local agricultural operations and are critical to the continuance of those operations.

We urge the BLM to adopt the proposed withdrawal to protect important aquatic resources and local water sources. We also urge the BLM to conduct thorough consultation regarding the aquatic resources of the Thompson Divide with Colorado Parks and Wildlife, local water managers, water rights holders, the angling community, and local municipalities.

II. The Proposed Withdrawal would conserve and protect some of the finest elk and mule deer habitat in the world and some of the best hunting opportunities in Colorado and beyond.

The three primary game management units that span the Thompson Divide and are among the most desirable to elk and mule deer hunters in the state. The largely roadless area serves as year-round habitat for those and other wildlife species, but notably supports more than 34,000 acres of elk migration corridors.

In 2011, more than 5,000 deer and elk tags were available by draw to hunters in the three main game management units that comprise the Thompson Divide. Hunters are also able to purchase unlimited over-the-counter bull tags that are valid in all of the Thompson Divide units<sup>1</sup>. Over-the-counter tags keep public lands hunting opportunities available to the average hunter and are becoming increasingly rare. Safeguarding places like the Thompson Divide ensure they will be there for future generations.

Hunting and angling provide an exceptional economic driver to the communities surrounding the Thompson Divide. According to the latest report commissioned by Colorado Parks and Wildlife in 2008 (latest available amalgamated data), hunting and angling provides more than 2,500 full-time jobs and \$137 million in revenue to the Thompson Divide's five counties<sup>2</sup>. These jobs are an integral part of the Western Colorado economy and can remain a permanent staple of the area's economic well-being as long as the key habitat that supports area fish and wildlife remains intact.

We urge the BLM to adopt the proposed withdrawal to conserve and protect some of the finest elk and mule deer habitat in the world and some of the best hunting opportunities in Colorado and beyond. We also urge the BLM to conduct thorough consultation regarding the big game and hunting values of the Thompson Divide with Colorado Parks and Wildlife, local outfitters, the hunting community, and local municipalities.

III. The Proposed Withdrawal would honor multiyear efforts by local communities to keep the Thompson Divide free of energy development.

The Thomson Divide is culturally, ecologically, and economically important to Western Colorado, Colorado as a whole, and particularly the adjacent communities. Not only does the Thompson Divide serve as the backdrop for local communities such as Carbondale, Glenwood Springs, and Paonia, but the area has also been fiercely defended by these communities from energy development. While some development has taken place adjacent to these communities,

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<sup>1</sup> All hunting tags statistics obtained at: <http://wildlife.state.co.us/Hunting/BigGame/Statistics/Pages/Statistics.aspx>

<sup>2</sup> The Economic Impacts of Hunting, Fishing and Wildlife Watching in Colorado. Sept 26, 2008.  
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the Thompson Divide is recognized as an intact stronghold that safeguards local water supplies, local outdoor pursuits, and serves as a driver for visitors who sustain numerous local businesses.

These realities resulted in the formation of multiple citizen-backed community organizations aimed at preventing development of the Thompson Divide, promoting responsible development where leases already exist, and protecting local watersheds and water supply.

We urge the BLM to honor multiyear efforts by local communities to keep the Thompson Divide free of energy development. Further, the BLM should conduct thorough consultation regarding community values with the municipalities of Carbondale, Glenwood Springs, and Paonia.

IV. The Proposed Withdrawal will protect wildlife and wildlife habitat from the harmful effects of oil and gas development and associated infrastructure and activity.

The Thompson Divide and surrounding areas provide important habitat for wildlife, including elk, mule deer, bobcats, cougars, and bears. The area is also home to numerous other avian species such as turkeys, and several species of raptors, among other important wildlife. These species rely on the large unfragmented habitats of the Thompson Divide, including the Thompson Creek and Clear Fork roadless areas. These intact landscapes provide secure breeding and foraging grounds and security from disturbance.

Oil and gas development would potentially harm wildlife that rely on the Thompson Divide and surrounding areas. Energy development directly and indirectly affects wildlife and wildlife behavior. Drilling for oil and gas requires the construction of roads, well pads, pipelines, and pump stations, all of which destroy or degrade wildlife habitat. While the BLM requires reclamation of these disturbances, it is often decades before these areas are returned to their former state and even then, reclamation in such an arid environment is challenging.

In addition to these direct effects, activities associated with energy development—truck traffic, pad construction, well drilling—impact wildlife behavior.<sup>3</sup> Mule deer and other ungulates avoid energy development, sacrificing access to important forage and habitat.<sup>4</sup> Moreover, recent studies show that, contrary to common assumption, mule deer do not habituate to this activity. Rather, they continue to avoid disturbance and disturbed areas. This change in behavior has long term negative implications for the health of mule deer populations.

We urge the BLM to adopt the Proposed Withdrawal to protect habitat in the Thompson Divide area from the harmful effects of oil and gas development, ensuring that the wildlife, intact landscapes, and biodiversity in this area persist for generations to come.

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<sup>3</sup> Hall Sawyer, Nicole M. Korfanta, Ryan M. Nielson, Kevin L. Monteith & Dale Strickland, *Mule deer and energy development—Long-term trends of habituation and abundance*, GLOBAL CHANGE BIOLOGY (Apr. 4, 2017). See also studies cited within this article.

<sup>4</sup> *Id.*

V. The Proposed Withdrawal will aid in maintaining and sustaining the long-established recreation economy of the area and maintain the ecological health of the most-visited National Forest in the United States.

The White River National Forest (of which the Thompson Divide is part) is the most visited National Forest in the nation. People come from across the country and indeed the globe to experience the myriad of outdoor opportunities and unique beauty found here.

Outdoor recreation is the bedrock of the economy in the Roaring Fork valley. Area retailers, hotels, restaurants, outfitting businesses, and guides have built and operated their businesses for decades around world-class recreation opportunities. Their model for sustainable economic well-being relies heavily on intact landscapes that attract visitors who wish to experience pristine forests and rivers, and healthy, huntable, and fishable populations of fish and game. These jobs offer more stability than short-lived energy development employment opportunities. But, without maintaining the healthy and vibrant natural resources of the area, the economic model that has so long sustained area businesses could be in jeopardy.

We urge the BLM to help sustain the long-established recreation economy of the area and maintain the ecological health of the most visited National Forest in the United States by withdrawing these lands from mineral development. Such an action would avoid the deleterious effects of energy development on the local recreation economies, and their abilities to provide local jobs and economic health.

VI. Conclusion

Because of the Thompson Divide's already vibrant outdoor-based economic structure, its unique ecological values (even as these values dwindle across Colorado), the extraordinary hunting and angling opportunities found in the area, and the distinct local support for the withdrawal, energy development is inappropriate here.

Large unfragmented and intact habitat is disappearing by the day and can never be entirely restored from large-scale energy development impacts. The most prudent approach is not to disturb or develop already intact landscapes. Further, by withdrawing the Thompson Divide, the BLM will honor the desires of local citizenry, refrain from disrupting the current local economy, and conserve a highly ecologically valuable area and its wildlife.

We support withdrawing the Thompson Divide from all forms of entry, appropriation, and disposal under the public land laws; location, entry, and patent under the mining laws; and operation of the mineral leasing, mineral materials, and geothermal leasing laws, subject to valid existing rights, as proposed by the BLM.

Thank you for the opportunity to comment. If you have any questions, please do not hesitate to contact us.

Sincerely,

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