



January 7, 2024

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

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

**RE: Draft EA & FONSI for the proposed Thompson Divide Administrative Withdrawal**

Mr. Edwards:

Thank you for the opportunity to comment on the draft environmental assessment (EA) and finding of no significant impact (FONSI) for the proposed Thompson Divide Administrative Withdrawal. High Country Conservation Advocates (HCCA) continues to support the proposed withdrawal and we urge the Secretary of Interior to approve this request as soon as possible. When approving the withdrawal we ask that the Secretary remove the lands that overlap with the proposed Mt. Emmons land exchange project.

This letter adopts and incorporates the issues raised in HCCA's previous comments submitted on January 13<sup>th</sup>, 2023 and joined by the following conservation groups and individuals: 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.<sup>1</sup> In those comments HCCA and our colleagues recommended that approximately 85 acres of lands included in the proposed Mt. Emmons Land Exchange should be excluded from the withdrawal area to facilitate the completion of the pending Mt. Emmons land exchange proposal.

This recommendation is included as a suggestion to the Secretary of Interior in the draft EA's Alternative A. Alternative A notes:

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<sup>1</sup> Prior comments from HCCA and others are available in the project record. See e.g., U.S. Dept. of Agriculture ("USDA"), USFS, and U.S. Dept. of Interior ("DOI"), BLM, Thompson Divide Withdrawal, EA and FONSI (Dec. 2023), at 53.



If the lands encompassing the proposed Mt. Emmons Land Exchange were to be withdrawn, the land exchange would not be able to proceed. However, when making a decision on the requested withdrawal, the Secretary of Interior may elect to exclude the lands proposed for exchange from the requested withdrawal application area, which would allow the land exchange to proceed.<sup>2</sup>

Additional conservation organizations have joined in continued support for this modification to facilitate completion of the land exchange in the letter submitted by Wilderness Workshop on January 8<sup>th</sup>, 2023. We encourage the Secretary to adopt this suggestion and move forward with Alternative A while excluding the lands proposed for exchange from the requested withdrawal application area.

The EA and FONSI describe the extensive existing values in the Thompson Divide area and area surrounding Mt. Emmons. We agree with the benefits identified in the draft EA. The EA demonstrates that the proposed action will support the following values critical to the public interest by preventing impacts from new mineral development:

- 84 miles of Colorado River cutthroat habitat
- 63.2 miles of designated outstanding waters
- Primary habitat for threatened Canada lynx and winter concentration areas for deer and elk
- Areas without road that may be impacted by roads for new oil and gas development

Importantly, the EA also describes the economic importance of tourism and agriculture in the area, noting that these sectors provide far more jobs than mining in the area. The values described by the EA for wildlife, water and local economies are precisely why local communities have advocated for decades to secure these protections.

The agencies' analysis demonstrates clearly that the existing uses surrounding Mt. Emmons and in the Thompson Divide far exceed the prospective value of mineral leasing and development there. We ask that the agencies move quickly to finalize this analysis and formally recommend that the Secretary of Interior approve administrative withdrawal of the Thompson Divide area excluding the areas of overlap with the Mt. Emmons land exchange proposal.

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<sup>2</sup> Page 35. U.S. Department of Agriculture and the U.S. Department of Interior. U.S. Forest Service. Thompson Divide Withdrawal Environmental Assessment and Draft Finding of No Significant Impact, by Elysia Retzlaff. Rocky Mountain Regional Office, December 2023. Available at <https://www.fs.usda.gov/project/?project=63679>.



Thank you for your consideration,

*Julie Nania*

Julie Nania, Red Lady Program Director  
High Country Conservation Advocates  
PO Box 1066  
Crested Butte, CO 81224  
Ph: 509-999-0012  
[Julie@hccacb.org](mailto:Julie@hccacb.org)