

Re: DOI-BLM-CO-G020-2023-0048-EA

I object to the West Mamm Creek Pipeline for the following reasons:

The West Mamm Creek area is one of the few areas relatively less impacted by oil and gas development in Garfield County. Further impact from pipeline development should not be permitted due to the adverse impacts that will inevitably occur and their cumulative contribution to existing impacts.

Due to generation of greenhouse gas emissions greatly increased by oil and gas development and combustion, climate disasters are accelerating and are predicted to continue to do so as oil and gas development continues. This method of producing energy must be phased out because it is leading to the gradual incineration of the planet and its inhabitants.

There hasn't been adequate analysis of impacts nor sufficient measures taken to assure that impacts are avoided or mitigated. In fact, BLM and USFS have been de-funded in recent years and will probably see more funding cuts. There is not adequate funding now for inspection, monitoring or enforcement and no reason to expect this will change in the future.

Greater stipulations are needed for protection of elk calving areas. Southeast of Forest Service road 818 through the area is an elk calving area. Activities, including road use, must be prohibited during calving season. In reality, this is not likely to happen. Even with limitations on traffic in this area, elk and deer winter range will still be impacted by human disruption. Cumulative impacts of oil and gas development are substantially decreasing wildlife throughout this area. To claim there will be no increased impacts with this development is disingenuous and false.

Since the proposed pipeline construction areas range from sagebrush and oak brush into spruce/fir (a large elevational range) and include aspen, a large number of wildlife species will be affected. It isn't possible to "mitigate" these impacts. Displacement is not "mitigation"; alternative habitats are almost non-existent.

The document published by the BLM states that a sensitive plant (i. e., one about which there is concern over continued persistence), Harrington's beardtongue exists along the proposed pipeline route. It also states that these plants will be impacted. There hasn't been an adequate evaluation of where it exists and how it would be protected. The areas of proposed pipe installation must be well surveyed prior to ground disturbance. Any populations of rare plants must be avoided with a buffer large enough to allow the population(s) to expand. The potential for successful "mitigation" given current climate disruption conditions isn't favorable.

It isn't possible to guarantee no leaks from these pipelines into the many seasonal streams and wetlands they will cross. Given the existing impacts to water quality from leaking pipes and spills, no further development of this kind should occur.

The proposed pipelines go across steep slopes. They should first be tested for erosion and mass wasting potential. Unstable slopes must be avoided. This is another reason to not permit these pipelines.

The ground disturbance necessary to install the pipelines will introduce or spread non-native vegetation, or weeds. Again, successful mitigation isn't likely to happen.

Garfield County has become a wasteland for oil and gas development. No consideration has been given to the cumulative impacts on the environment or human health due to concessions to the oil and gas industry. This bowing down to the oil and gas industry needs to end.

Given the impossibility of adequately mitigating all the impacts from this pipeline project and the cumulative impacts of existing oil and gas development throughout the area, this project should be denied.

I have made a diligent attempt to file my objections in the required manner. Although individual staff (Jill Bogdanovich and Cary Green (USFS) have been helpful, the BLM process in particular, is very cumbersome and confusing. It should be possible to file both public comment and objections electronically. This process needs to be modernized and upgraded. Please notify me if you need further information from me.

Thank you--
Diane Brower

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