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Comments: ATTN: Docket ID No. LLCO923000-L1440000-ET0000

Anthony Edwards, Deputy Forest Supervisor, USDA Forest Service

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RE: FR Doc. LLCO923000-L1440000-ET0000

To Whom It May Concern:

The Center for American Progress (CAP) supports the USDA Forest Service and DOI Bureau of Land Management's proposed issuance of a 20-year mineral withdrawal in the Thompson Divide by the authority of the Minerals Leasing Act. Taking the Thompson Divide off the table for new mining, oil, and gas leasing is a necessary step to permanently and effectively protect one of Colorado's most intact and biodiverse landscapes.

The Thompson Divide is best known for its outdoor recreation, agriculture, fishing, hunting, and community values. A new analysis done by CAP and Conservation Science Partners found it is particularly important for its wildlife and ecological values. In fact, the Thompson Divide contains more than 110,000 acres of some of Colorado's most high-value, undeveloped and valuable land. In particular, the area is superlative for ecological intactness, imperiled species richness, landscape connectivity, and climate adaptation.

Oil and gas activities put the ecosystem at risk by way of habitat degradation and fragmentation and continued leasing on these lands creates a terrible risk for the ecological qualities of the Thompson Divide. The Thompson Divide holds considerable wildlife and ecological values, especially when compared to the low value of oil, gas, and saleable materials in the same area.

For additional information and data on the wildlife and ecosystem benefits of the Thompson Divide and our interests concerning the proposed 20-year Mineral Withdrawal, please see the following report, which is also attached below:

Ecosystem Benefits of the Thompson Divide Mineral Withdrawal

Thank you,

Sharon Ferguson

Research Associate, Conservation Policy

Center for American Progress

Ecosystem Benefits of the Thompson Divide Mineral Withdrawal

By Sharon Ferguson and Jenny Rowland-Shea

Posted on June 13, 2023

The Thompson Divide is home to some of Colorado's oldest forests and is well known for its recreational, cultural, and scenic values as well as its clean air and water. To ensure these values are lasting, in October 2022, the Biden administration announced it would protect the area from new oil and gas drilling. This move, formally known as a "mineral withdrawal," would take more than 225,000 acres off the table for oil, gas, and mining development, protecting an area long known to be too special to drill.

Within the Thompson Divide's roadless hills and forests is a lush ecosystem, home to valuable fish and game such as trout, elk, bears, and deer. A new Center for American Progress analysis finds just how important the new protections would be for wildlife: Nearly half of the Thompson Divide withdrawal area comprises some of the most high-value landscapes for wildlife across the entirety of Colorado. In particular, the withdrawal area is superlative for its intact ecosystems and density of at-risk species.

For now, new mineral leasing is paused while the U.S. Forest Service (USFS) and U.S. Bureau of Land Management (BLM) gather science and public input for an environmental analysis. The Thompson Divide is incredibly important for a wide variety of uses, but particularly for its wildlife values. A mineral withdrawal is necessary to conserve the area and will help the president meet his "America the Beautiful" conservation goals, including to protect 30 percent of U.S. lands and waters by 2030.

Oil and gas does not belong in the Thompson Divide

The Thompson Divide has a turbulent history of oil and gas leasing and extraction. Between the early 1990s and early 2000s, more than 100,000 acres were leased to oil and gas companies-many of which were issued without proper environmental review. The USFS closed much of the area to new leasing in 2015, but there are still 23 existing leases held in the area. Moreover, the growing consensus is that most of the natural gas in the Thompson Divide has already been extracted, and areas of high oil potential are scarce. Nonetheless, emissions, noise, and light pollution from oil and gas mining and extraction continue to negatively affect ecosystems worthy of protection in the Thompson Divide.

For more than a decade, diverse stakeholders-ranging from sportsmen, ranchers, hikers, and business owners to local government and members of the community-have united to advocate for a permanent mineral withdrawal for the Thompson Divide. Since 2015, nothing about the land use potential of the area has changed: The value of oil and gas leasing has remained low compared with the extreme value of the area for outdoor recreation, agriculture, hunting, fishing, and wildlife. Moreover, oil and gas puts the ecosystem at risk by fragmenting the landscape with roads, well pads, and pipelines that pollute the region's air and water.

The ongoing withdrawal analysis will help the BLM and USFS protect the recreational and ecological value of the Thompson Divide.

The Thompson Divide is superlative for wildlife and ecological values

"Colorful Colorado" is an apt nickname for a state renowned for its rolling hills of verdant forests, towering snow-capped mountain tops with breathtaking views, and some of the most popular wildlife in North America. As one of the largest expanses of unfragmented, roadless forests, the Thompson Divide is worthy of protection for many reasons, but its ecological value to wildlife is among its best merits. The area supports iconic mammals such as black bears and elk as well as endangered species such as the Colorado River cutthroat trout and Canadian lynx.

Furthermore, a new analysis from CAP and Conservation Science Partners finds that 49 percent—approximately 110,600 acres—of the 225,000-acre Thompson Divide mineral withdrawal area is among the most high-value ecosystems in all of Colorado. The analysis assessed areas of ecologically high-value land within the Thompson Divide by identifying acres of land that are within the top 25 percent of all unprotected and unleased BLM and USFS land in Colorado. Specifically, land values were evaluated using the following indicators: ecological intactness, ecological connectivity, imperiled species richness, and climate accessibility. The results demonstrate that nearly half of the Thompson Divide proposed withdrawal area is in the 75th percentile for at least one of these ecological characteristics compared with the rest of the state.

Of the indicators analyzed, ecological intactness is the most notable characteristic of the Thompson Divide. This indicator, which evaluates the pristine qualities of a given range, speaks to the area's dense concentration of unfragmented, undeveloped forest. In total, 47,200 acres within the Thompson Divide were found to be among the most ecologically intact across the entire state. Meanwhile, nearly 34,000 acres within the Thompson Divide are among the best for ecological connectivity, connoting a low extent of habitat fragmentation. Fragmentation has particularly damaging consequences for wildlife habitats and the species that depend on them because it prevents wildlife from accessing food and shelter resources.

The Thompson Divide proves to be high-quality habitat for many threatened and endangered plant and wildlife species. Nearly 40,000 acres within the withdrawal area are in the top 25 percent of lands in terms of the number of imperiled species that they support. These acres of land are the most suitable habitat for endangered, threatened, or otherwise imperiled species because of the high degree of species' overlapping ranges found here.

#### Acres of Wildlife Value Indicators Within the Thompson Divide Proposed Withdrawal Area

(Values represent the top 25 percent of unprotected, unleased Bureau of Land Management and U.S. Forest Service land in Colorado):

Area of proposed withdrawal: 225,000

Wildlife value indicator

Ecological intactness: 47,200

Ecological connectivity: 33,900

Imperiled-species richness: 35,200

Climate accessibility: 22,400

Total acreage with at least one indicator of high value\*: 110,600

\* Accounts for overlap between the ranges of each indicator, meaning that acres of land featuring more than one indicator are not counted twice.

Source: Conservation Science Partners, "Identifying ecological surface values on BLM and USFS lands to support their withdrawal from oil and gas development: Thompson Divide Withdrawal Area Wildlife Value Summary" (Truckee, CA: 2023), on file with authors.

Table: Center for American Progress

Another 22,400 acres were found to be some of the best for climate accessibility, meaning that this range features climate conditions that will remain stable in the future and can continue to provide support for the movement of wildlife between habitats as they are forced to adapt to climate change. The biggest threats to climate accessibility are habitat fragmentation and extreme climate change, both of which are major consequences of oil and gas mining and extraction. A holistic consideration of wildlife indicator values in the Thompson Divide tells a story of how oil and gas mining overwhelmingly threatens the ecosystem and warrants a mineral withdrawal.

Despite the low value of oil and gas leasing remaining in the Thompson Divide, there is no shortage of important ecological values that stand to be affected should development continue. Conservation in the Thompson Divide outweighs oil and gas leasing because almost 75 times more land is considered high value to wildlife than high value for oil and gas. Even though there is low potential for oil and gas leasing, these activities are actively harming wildlife habitat, which makes this withdrawal especially critical.

## Conclusion

The Thompson Divide is important for many reasons, including recreation, grazing, clean air and water, and wildlife habitat. The area's ecological and wildlife features, in particular, are some of the best in Colorado.

The gilded potential of oil and gas development in the Thompson Divide should not overshadow the real ecological benefit of preserving these lands through a federal mineral withdrawal. As the area continues to wait for permanent congressional protection, a mineral withdrawal is necessary to protect these valuable resources from disturbance and destruction from ongoing oil and gas leasing.

The authors would like to thank Nicole Gentile, Sam Zeno, Steve Bonitatibus, Meghan Miller, Keenan Alexander, and Conservation Science Partners for their contributions to this column.

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