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First name: Natasha

Last name: Leger

Organization: Citizens for a Healthy Community

Title: Executive Director

Comments: Please find attached letter and Attachments from Citizens for a Healthy Community, Colorado Farm and Food Alliance, Valley Organic Growers Association, and Western Slope Conservation Center.

Citizens for a Healthy Community (CHC), Colorado Farm and Food Alliance, Valley Organic Growers Association, and Western Slope Conservation Center respectfully submit these scoping comments regarding the proposed 20-year administrative withdrawal of approximately 225,000 acres in the Thompson Divide Area.<sup>1</sup> We strongly support the proposed 20-year administrative withdrawal in the Thompson Divide Area, including National Forest System lands, BLM- managed public lands, and Federal mineral interest (as illustrated in the Thompson Divide withdrawal map dated September 15, 2022 in Attachment 1), to protect agricultural, ranching, wildlife, air quality, recreational, ecological, and scenic values. We hereby incorporate by reference the January 16, 2023 comments CHC submitted and the January 13, 2023 letter submitted by Colorado Farm and Food Alliance, et al to the Bureau of Land Management (BLM) in response to the Notice of Proposed Withdrawal and Public Meeting, Thompson Divide Area, Colorado published in the Federal Register in October. 87 Fed. Reg. 62878 (Oct. 17, 2022). See Attachment 2 and 3. In addition, we support the scoping comments submitted by Wilderness Workshop, et al. Our comments focus specifically on the climate crisis facing public lands in the Thompson Divide Area and the North Fork Valley.

Citizens for a Healthy Community (CHC) is a nonprofit organization of over 500 members, based in Paonia, CO, dedicated to protecting the air, water and foodsheds of the Delta County region from the impacts of oil and gas development and paving the path to a clean and renewable energy future. CHC represents farmers, business owners, ranchers, vintners, recreationalists, outfitters, realtors and more. Our community has been fighting for over a decade to protect the North Fork Valley from new oil and gas leasing and development.

Colorado Farm & Food Alliance (COFFA) is a Delta County based nonprofit organization which works to educate about the state's agricultural land legacy, to promote greater food security, and to develop leadership in support of sustainable and equitable farms and food systems, land and water conservation, and climate action.

Valley Organic Growers Association (VOGA) represents over 125 small- and medium- sized farmers in the North Fork Valley of western Colorado. This thriving agricultural community provides high-quality food and other agricultural products to markets all around the state, and creates a vibrant agritourism economy that supports the valley. Our farms and businesses rely on clean water, clean air, and the bucolic setting we live in to maintain our reputation for farm-fresh, nutritious, flavorful food, and we strive to preserve our unique place and economy.

Western Slope Conservation Center, based in the North Fork Valley, builds an informed and engaged community to protect and enhance the lands, air, water, and wildlife of the Western Slope. WSCC is a 600+ member grassroots organization with a focus on public lands advocacy, watershed stewardship, and environmental education. Founded in 1977, the WSCC has a 40+ year history of engaging with BLM and USFS on public lands management issues across the western slope of Colorado.

In February 2023, the Colorado Farm and Food Alliance published Gunnison River Basin: Ground Zero In The Climate Emergency.<sup>2</sup> The report describes the signs of climate change in the Gunnison River Basin, including temperature changes and rising atmospheric carbon dioxide. It also highlights the impacts on the region of climate change including, loss in water quantity and quality, extreme weather, wildfire, flooding, human health and impacts to plant, animal and land health. The report finds that the indicators for the Gunnison River Basin are all flashing red, and are ground-zero for climate change impacts on the Western Slope of Colorado.

Recent climate changed-induced events in Delta and Gunnison County reinforce the necessity and urgency of this proposed administrative withdrawal. The 2022-2023 winter season experienced unusually high snowfall, which resulted in rapid high-volume runoff due to higher temperatures in the Spring. The following infrastructure damage was a direct result of Delta and Gunnison County warming faster than the national and global average.

\* According to Delta County, in late April, 4 days before the Highway 133 collapse a few miles north, a landslide occurred on Hubbard Creek Rd, which submerged the road and closing it indefinitely. According to the US Geological Survey, with climate change and speed of the spring runoff, like we just experienced in 2023, landslide activity will increase.<sup>3</sup>

\* On May 3, 2023, a 10-foot-wide section of Highway 133 collapsed at Bear Creek Road, between Paonia and Somerset when high water pushed a failed culvert down the hillside.<sup>4</sup> While the rusty culvert was identified as needing repair in 2020, it was the rapid runoff resulting from climate change, including abnormally high snowfall and rapid melt from early high temperatures that forced rushing water to destroy the roadway. The highway has been closed for six weeks as of the date of this letter and if it reopens as anticipated with a temporary bridge by the end of June 2023 it will have been closed for nearly 2 months. According to the Colorado Department of Transportation, the temporary bridge to reopen the highway will cost an estimated \$1.9 million. Permanent repair will occur later in the summer or fall and will incur additional significant cost. The closure of the highway has had a devastating economic impact on small businesses, farmers, and ranchers in the North Fork Valley.

\* Multiple substantial washouts have occurred on Grand Mesa, Uncompahgre and Gunnison National Forests Paonia Ranger District, making motorized travel impossible on several National Forest System Roads. For example, on May 24, 2023 fast runoff washed out the seasonal Kebler Pass Road. A portion of the road collapse, making the through traffic between the North Fork Valley and Crested Butte along the scenic byway impassable. As of the date of this letter, there is no estimated date for reopening the road.<sup>5</sup>

In conclusion, we strongly support the proposed 20-year administrative withdrawal for the Thompson Divide Area as urgent and necessary. We encourage the US Forest Service to look at all of the support built to protect the Thompson Divide and the North Fork Valley from oil and gas development and finalize this mineral withdrawal for the full twenty years. This area is of incredible importance to us in the North Fork Valley, and to see it withdrawn from oil and gas development would ensure that the ecosystem upon which we depend is protected for future generations.

Footnotes:

1 See U.S. Forest Service project website for the proposed Thompson Divide withdrawal, <https://www.fs.usda.gov/project/?project=63679> (last accessed June 14, 2023).

2 Lauren Traylor and Pete Kolbenschlag, The Gunnison River Basin: Ground-Zero In The Climate Emergency, The Colorado Farm and Food Alliance, (February 2023), available at <https://www.colofarmfood.org/groundzero>

3 Dennis Webb, [Idquo]Speed of spring runoff can affect risk of seasonal landslides,[rdquo] Grand Junction Sentinel, June 1, 2023, available at: <https://www.gjsentinel.com/news/speed-of-spring-runoff-can-affect-risk-of-seasonal-landslides>

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4 Dave Marston, Rushing water closes a highway in Western Colorado, Writers on the Range, (June 5, 2023), available at: <https://writersontherange.org/rushing-water-closes-a-highway-in-western-colorado/>; Rick Allen, Mudslide, sinkhole on 133 product of increased runoff, Aspen Daily Times, (May 5, 2023), available at: [https://www.aspendailynews.com/news/mudslide-sinkhole-on-133-product-of-increased-runo:/article\\_0f285b82-eb06-11ed-9b7d-a70681ee5542.html](https://www.aspendailynews.com/news/mudslide-sinkhole-on-133-product-of-increased-runo:/article_0f285b82-eb06-11ed-9b7d-a70681ee5542.html); Attachment 4: photos of Highway 133 collapse; Attachment 5: photos of

Kebler Pass road collapse.

5 Marston; Spring Conditions Create Temporary Road Closures, US Forest Service, May 26, 2023, available at: <https://www.fs.usda.gov/detail/gmug/news-events/?cid=FSEPRD1110025>; Katherine Nettles, Still no opening date for Kebler Pass Road, Crested Butte News, June 14, 2023, available at: <https://crestedbuttenews.com/2023/06/still-no-opening-date-for-kebler-pass-road/>

Attachment A: Proposed Thompson Divide Area Withdrawal Map

Attachment 2: Letter from Citizens for a Healthy Community dated January 16, 2023

Attachment 3: Letter from Colorado Farm and Food Alliance, Valley Organic Growers Association, and Western Slope Conservation Center dated January 13, 2023

Attachment 4: Highway 133 road collapse photos

Attachment 5: Kebler Pass washout photo