

Data Submitted (UTC 11): 1/2/2024 7:00:00 AM

First name: Robin

Last name: Todd

Organization:

Title:

Comments: Dear Forest Service,

Please find attached a letter from the Maryland Ornithological Society commenting on the proposed withdrawal of 224,713 acres in the Thompson Divide area of Colorado from all future oil and gas leasing or mining for a period of 20 years.

The Maryland Ornithological Society (MOS) has the pleasure of submitting the following comments on the draft environmental assessment (EA) for the proposed mineral withdrawal for the Thompson Divide in Colorado.

We compliment President Biden and Secretary of the Interior Deb Haaland for proposing to withdraw 224,713 acres from all future oil and gas leasing or mining for a period of 20 years, the maximum period allowed by the federal land laws. The Thompson Divide is in the mountains of Colorado, south of Glenwood Springs and west of Aspen and Crested Butte. It serves as a connecting block of wildlands bordering on three wilderness areas: the Maroon Bells-Snowmass Wilderness, the West Elk Wilderness, and the Raggeds Wilderness.

Members of the MOS have visited the decision area, as it contains important habitat for birds and other forms of wildlife. MOS is a statewide nonprofit organization established in 1945 and devoted to the study, conservation and enjoyment of birds. Currently we have 15 chapters and approximately 2,000 members. Every year MOS members travel to federal lands throughout the United States on birding and nature-watching vacations. We spend dollars on food, lodging, guide services, books and souvenirs to support the local economy wherever we go. Birding is one of the fastest-growing outdoor recreational activities.

Our Recommendation: We urge that the withdrawal be completed as soon as possible. We support Alternative A as analyzed in the EA, representing the 20-year withdrawal. Alternative B describes a scenario involving oil and gas development and hardrock mining, which would lead to the loss or impairment of many wildlife habitat values of the Thompson 2 Divide. We also favor legislation to make the withdrawal permanent, as already introduced in Congress by Senators Michael Bennet and John Hickenlooper and Representative Joe Neguse.

Bird and Wildlife Habitat Values: Birds found on the Thompson Divide reflect the diversity of habitats there, including streams, wetlands, riparian areas, grass/forb meadows, shrub lands, deciduous forest, coniferous forest, mixed forest and rock outcrops. Dozens of migratory bird species find suitable breeding habitat there. The decision area has high value as wildlife habitat and as a critical migration corridor for lynx, moose, bear, deer, elk, and mountain lions.

The EA reports that the area includes potential habitat for 27 terrestrial wildlife species designated as BLM and FS Sensitive Species. The EA reports that the following species have either been detected or have known individuals or populations within the withdrawal area: Pacific Marten, Pygmy Shrew, Boreal Owl, Bald Eagle, Golden Eagle, and Northern Goshawk.

Economic Values: We believe that watchable wildlife, heritage tourism, and the economic benefits of unimpaired wild lands will prove to be more valuable and more sustainable than the extraction of minerals and fossil fuels. We favor preserving local natural resource-based economies and generations-old traditions in the Thompson Divide area. With careful planning and execution, these industries can remain an integral and essential part of evolving tourism-based economic development, and both sectors can flourish.