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First name: John

Last name: Martin

Organization: Garfield County Board of County Commissioners

Title: Chairman

Comments: RE: Comments on the EA and FONSI/ for the Thompson Divide Withdrawal Project

Mr. Edwards:

The Garfield County Board of County Commissioners appreciates this opportunity to provide comments to the United States Forest Service regarding the draft environmental assessment and finding of no significant impact for Thompson Divide Withdrawal Project (EA and FONSI). By way of background, after more than a decade of highly engaged policy debate, on July 15, 2019, the Commissioners officially offered a position of no objection for the Thompson Divide portion of the CORE Act. This position was offered specifically because of a 'methane capture' rule that was included at the urging of Garfield County Commissioners for the purpose of addressing significant environmental impacts from existing coal mines that currently leak/emit uncontrolled methane, a greenhouse gas and primary contributor to formation of ground-level ozone, a hazardous air pollutant. More recently and despite this commonsense accommodation for beneficial methane capture, President Biden unilaterally acted to place additional restrictions on future leasing in Thompson Divide. Unfortunately, this act neutered Garfield County's position because it eliminated the methane capture rule so important to the County and which had the tangible benefit of improving our local environment by addressing climate change. Within our June 5, 2023, comment letter the Garfield County Board of County Commissioners restated our position regarding the Thompson Divide Withdrawal and requested inclusion of language to allow methane capture. The County is disappointed, despite acknowledgement that " ... recent ozone monitoring data in cities near the withdrawal application area during the last several years shows ozone levels remain just below the established health standard of 70 ppb." The EA and FONSI fail to acknowledge the air quality and climate benefits of allowing methane capture at coal mine sites within the withdrawal area. The Commissioners would like to see this 'methane capture' rule placed back into effect in any new withdrawal decision by the USFS to reflect its original position.