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Organization: Continental Divide Trail Coalition

Title: Colorado Regional Representative

Comments: RE: Thompson Divide Withdrawal Project Draft Environmental Assessment and Finding of No Significant Impact

Dear Deputy Supervisor Edwards,

Thank you for the opportunity to provide comments regarding the Draft Environmental Assessment for the Thompson Divide Withdrawal Project. We are happy to assist you with this process and help you strive for the highest quality outcome possible. While the Thompson Divide Area does not include a trail segment of the Continental Divide National Scenic Trail (CDNST), the White River and Gunnison National Forests do contain many miles of the CDNST, which is inherently connected to the larger landscape conservation, wildlife corridors, and environmental protection efforts.

Representing approximately 2,000 members nationwide, the Continental Divide Trail Coalition (CDTC) is the 501(c)(3) national nonprofit organization formed in 2012 to work with the federal land management agencies to complete, promote, and protect the Continental Divide National Scenic Trail. The CDNST was designated by Congress in 1978 as a unit of the National Trails System. The 3,100-mile CDNST traverses nationally significant scenic terrain and areas rich in the heritage and life of the Rocky Mountain West along the Continental Divide between Mexico and Canada. It travels through 20 National Forests, 21 Wilderness areas, 3 National Parks, 2 National Monuments, 8 BLM resource areas and through the states of Montana, Idaho, Wyoming, Colorado and New Mexico. The vision for the CDNST is a primitive and challenging backcountry trail for the hiker and horseman on or near the Continental Divide to provide people with the opportunity to experience the unique and incredibly scenic qualities of the area.

History of Support in the Region for Withdrawal

For over a decade, protection of the Thompson Divide has been a priority for many communities across the state, garnering support from a diverse and bipartisan coalition of ranchers, hunters, elected officials, business owners, hikers, mountain bikers, skiers, snowmobilers and conservationists. Current recreation opportunities in the Thompson Divide contribute to the livelihoods and quality of life for surrounding communities. Not only do these opportunities in the Thompson Divide contribute to the overall quality of life for many residents, they also play an important role in the region's recreation economy.

As noted in the Environmental Analysis, "There is a potential for mineral exploration and development to impact the recreation experience in some areas, due to the increased presence of people and equipment and the associated noise related to development. The recreation experience could also be impacted by changes in visual qualities. Recreation access and patterns could be impacted due to road closures or restrictions during mineral exploration and development." These negative impacts to recreation seem opposed to the history of support showcased by the Thompson Divide's diverse coalition.

For additional context as provided in previous comments by CDTC, it should be noted that in CDTC's 2022 Small Business Report respondents to the survey overwhelmingly shared the important relationship between greenspaces protections and their community's way of life. Some of the findings of that survey include:

- 90% of all respondents believe protecting, promoting, and enhancing public lands is important to the well-being of businesses, jobs, and their community's economy

- 80% have seen growth in business in their community at large due to use of the CDNST since 2014
- 70% of respondents support the 30x30 initiative to protect 30% of lands and waters in the continental U.S. by 2030
- 70% of respondents reported that trail users spend money and have a positive impact on their revenue
- 60% have experienced growth in their business in particular due to use of the CDNST since 2014

These survey results help provide a snapshot of how protections for greenspaces like the CDNST and its surrounding landscape can support rural economies. Communities and businesses depend on conservation to protect the greenspaces that people come from around the world to visit, but these are also people who depend on these protected greenspaces for the water they drink, air they breathe, and food they eat. Further development of extractive industries and other activities could be detrimental, not only to the outdoor recreation industry, but the personal wellbeing and way of life for many of those living along the Divide.

Additionally, watersheds in the Thompson Divide provide clean water to local farmers and ranchers, many of whom depend on these public lands for summer grazing allotments. These working ranches contribute to the local economy, provide a source of food and help define the region's rural character. The Thompson Divide is also one of the most biologically significant landscapes in the U.S. Linking wildlands on the Western Slope to the Elk Mountains, the area is a known important migration corridor for lynx, moose, elk, deer, bear and mountain lions. It is important to maintain ecological health on the landscape, as climate change and development continue to increase pressures on wildlife populations throughout the West.

Support for Administrative Withdrawal in the Environmental Analysis

The EA and FONSI recognizes that the Thompson Divide is a unique place with myriad natural and economic values related to recreation, scenery, grazing/rangelands, watersheds, wildlife, and other resources that are unrelated to and incompatible with future oil and gas development. These are the values that have long motivated locals and people from all across the country to advocate for protection of the area. In reviewing the information in the agencies' analysis and supplemental information clearly shows that existing uses and values in the Thompson Divide far exceed the prospective value of mineral leasing and development there.

Conclusion

CDTC believes that the relatively small potential profits from mineral development as noted in the Draft Environmental Assessment for the Thompson Divide Withdrawal Project are not worth the trade-off of damaging the existing recreation, agricultural and economic values that depend on existing ecological conditions in the Thompson Divide. Therefore, we ask the Forest Service and BLM to quickly finalize this analysis and formally recommend that the Secretary of Interior approve administrative withdrawal of the Thompson Divide area.

We thank you for the opportunity to comment and participate in the management and protection of the CDNST. If you have any questions, please contact Luke Fisher, Trail Policy Program Manager, by phone at (406) 272-6179 or by email at Lfisher@continentaldividetrail.org, or Jordan Williams, Colorado Regional Representative, at (360) 244-9249 and jwilliams@continentaldividetrail.org.