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First name: Sandy
Last name: Borthick
Organization:
Title:
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Submitted electronically to: John Dow, PSICC Forest Planner
psicc_oandg@fs.fed.us
PSICC Supervisor's Office
2840 Kachina Dr.
Pueblo, CO 81008 or Phone 719-553-1476

I attended the PSICC Forest Service Open House at the Walsenburg Community Center on Tuesday, May 21, 2013 to learn more about the PSICC Oil and Gas Leasing EIS, announced as part of the EIS process announced here –
http://www.gpo.gov/fdsys/pkg/FR-2013-05-20/html/2013-11909.htm

Thank you for the opportunity to express my concerns about this project in particular, and in general about the management of the PSICC as it pertains to the potentially damaging effects of nearby oil and gas development on the health and sustainability of our public lands. At the EIS open house in Walsenburg, we were told that the purpose of the EIS is to analyze "the effects of potential future oil and gas development and focuses on surface disturbing activities," and that the need for this EIS was triggered, in part, by pending requests from oil and gas developers with the BLM to lease "roughly another 27,000 acres of PSICC lands."

First my general concern: The mission of the USFS is "to achieve quality land management under the sustainable multiple-use management concept to meet the diverse needs of people," and the mission of the BLM is "to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations."

I do not understand how these missions can be accomplished by the current PSICC Resource Management Plan, which is almost 30 years and has already been amended 33 times. (see -- http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsm9_032277.pdf and http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5229250.pdf) Nor do I understand the relationship between these documents and the Memo of Understanding signed in 2009 by top Colorado BLM, USFS and COGCC officials. (see -- http://cogcc.state.co.us/Library/mou-moa/BLM_COGCC_USFS_Permitting_MOU_2009.pdf)

Now for my very particular concern with the proposed PSICC EIS: At the Walsenburg EIS open house, two maps were displayed which were intended to show the Reasonable and Foreseeable Development Scenarios in the vicinities of the Pike and San Isabel National Forests. One map was for "conventional oil and gas" and the other for "coalbed methane." (see http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5421317.pdf and http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5421317.pdf) Staffers could not explain whether either map included the reasonable and foreseeable development of hydraulically-fractured or "tight" oil and gas, commonly referred to as "unconventional oil and gas."

The problem seems to be threefold: (1) these maps are based only on data from BLM; (2) that BLM data is more than two years old; and (3) that data is not accurate or complete. For example, since April, 2011, Shell Western Exploration and Production Inc (SWEPI, a unit of Royal Dutch Shell), has been filing applications for permits to drill for unconventional oil and gas in the vicinity of La Veta and Gardner, in Huerfano County. SWEPI drilled one of these wells in fall/winter 2012-13 and will hydraulically fracture it in June 2013.

The PSICC RFD scenarios and maps need to be updated with the most current information – and USFS planners should consult not only with the BLM, but also with the Colorado Oil and Gas Conservation Commission (COGCC), because the COGCC knows about oil and gas plans on both public and private lands near the PSICC National Forests and Wilderness Areas.

The EIS will not be credible if its underlying assumptions are incomplete, inaccurate or out-of-date. It would be better to launch a complete revision of the 30-year-old PSICC Resource Management Plan that would take into account all the on-the-ground changes in the PSICC National Forests in the past 30 years, and all that we have learned during that 30 years about oil and gas development impacts!

For example, we know now that oil and gas development in general, and especially hydraulic fracturing, have the proven potential to damage nearby USFS and BLM lands, plants, wildlife and humans with air and water pollution. We know that all well casings fail eventually. We know that the $50,000 drilling bonds which are required of oil and gas developers – and haven't changed in more than 60 years -- are meaningless as deterrents for poor practices that lead to spills and accidents. We also know that long-tailed environmental liability insurance and the proliferation of Superfund sites fail to effectively mitigate the risks or remediate the damages associated with poor practices.

Perhaps PSICC could be the first of our National Forests to require that oil and gas developers who operate nearby must post adequate monetary bonds ahead of their projects to pay for the remediation of any damages done to public lands, air, water, wildlife or humans.

Thank you for your consideration,
Sandy Borthick
borthick@amigo.net
PO BOX 123 La Veta, CO 81055