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Comments: I find the disembodied evaluation of the West Mamm Creek Pipeline Proposal very disturbing. Line after line accepts the status quo and past cumulative impacts of oil and gas in Garfield County and across Western Colorado as a given and as meriting continued adherence. It's infuriating that there is no recognition of the emergency that has overtaken our world with species extinction and accelerating climate catastrophes. I recognize that USFS and BLM staff are following regulations, but at what point do everyday people stop adhering to a tow-the-line mindset that is decimating our planet?

West Mamm Creek includes high-priority elk habitat and is a pristine and productive wildlife area. Unquestionably this pipeline development will negatively impact wildlife habitat. To base wildlife impact on an evaluation of this area in isolation ignores the cumulative impacts of approximately 12,000 wells already existing in Garfield County and already having impacted wildlife, air quality, vegetation, human health and the whole host of factors generated by industrial scale oil and gas development on natural systems. I have traveled through Garfield County for 40 years and the degradation of air quality by itself is clear to see.

--Rare plants. The BLM states that a sensitive plant (i.e., about which there is concern over continued persistence),Harrington's beardtongue, likely exists along the proposed pipeline route. The areas of proposed pipe installation must be well surveyed prior to ground disturbance, and any populations of rare plants be avoided with a buffer large enough to allow the population(s) to expand, given the reality of climate change impacts.

--Soil stability. If the proposed pipelines go across slopes of any steepness, they should first be tested for erosion and mass wasting potential. Unstable slopes must be avoided.

--Noxious weeds. The ground disturbance necessary to install the pipelines has the potential to introduce or spread non-native vegetation. These areas already contain noxious weeds. Further disturbance will definitely cause existing weeds to spread. Any populations found must be eradicated before ground disturbance occurs.

Supposedly "short-term, temporary impacts may include: effects to air quality and elevated noise levels during construction, effects to rangeland until revegetation efforts are complete, effects to Yellow billed cuckoo foraging, breeding, nest building/site selection, and raising young, effects to Harrington's beardstongue (individuals), effects to surface water via sedimentation and temporary displacement of big game and other wildlife that may be in the area." There's no reason to assume that these impacts will actually be short-term. That's a good line, but probably not accurate in the real world.

There is no question that oil and gas leaks and other accidents have already impacted watersheds and water quality. Pipelines crossing Beaver Creek and Tepee Creek pose a significant threat to essential water sources. Pipelines inevitably leak, have leaked in the recent past and currently. The oil and gas industry has a poor record of assuring that leaks won't happen. TEP in particular doesn't have a good record related to gas leaks.

Oil and gas development also emits toxins and methane, which are harmful to humans, wildlife and the environment, contributing to catastrophic climate disruption. Regulations dating from 1976 have no relevance in light of what we know now about climate disruption and the impacts of fossil fuels on our planet. Garfield County has been impacted by the extraordinary number of oil and gas leases permitted over decades. How many times has an oil and gas proposal actually been denied? This in itself is an indication of the lack of seriousness and cavalier approach to oil and gas regulation in Garfield County, across western Colorado, and the entirety of Colorado. There are very few areas that haven't been impacted. It doesn't appear that there are any areas in which oil and gas development has been halted -- variances are always available. There needs to be greater

emphasis on conservation and protection of the environment that is still relatively pristine in the West Mamm Creek area, with its high wildlife and riparian value. It is one of the very few areas that is still somewhat pristine in Garfield County.

The EA states that: "The pipeline would also support oil and gas development to help meet the public's current and future energy demands while improving reliability and safety. The COAs (see Appendix A to the EA) will be followed to assure that effects are avoided or minimized and do not have a significant effect on the human environment." This is a dangerous and meaningless statement. It is scientific fact that "the public" and the entire world needs to phase out fossil fuels for "current and future energy demands" and that oil and gas is neither reliable (It's becoming a 'stranded asset".) and it's certainly not safe by any definition of the word.

Monitoring by the oil and gas producer is a ridiculous practice - the proverbial "fox guarding the henhouse." A contractor who has done monitoring himself acknowledges that monitoring is problematic: inconsistent and inconclusive. To claim that this practice will prevent uncontrolled impacts is misleading to say the least. This applies to weeds, slope stability, as well as wildlife and vegetation generally.

Restoration and mitigation are arbitrary terms. Humans can attempt to restore and mitigate their impacts, but the results are almost always a degradation of the undisturbed environment.

The reality is that USFS and BLM have less and less funding to monitor and enforce violations and impacts by oil and gas developers. This will certainly continue for the next four years and possibly beyond. It's folly to allow oil and gas development to continue to expand, knowing that it will basically be unregulated by agencies in charge of these lands and given the certainty that it will be a large driver of catastrophic climate disruption.