

Support for Alternative F and Conservation Management in the Colorado River Valley and Grand Junction Field Offices Draft Supplemental Environmental Impact Statement (SEIS)



Castle Peak Wilderness Study Area in Eagle County, which is proposed for expansion in Alternative F of the draft SEIS. Photo credit: Jon Mullen/EcoStock

Please find the below letters that have been submitted to the Bureau of Land Management in support of Alternative F and the conservation-based management considered in the draft Supplemental Environmental Impact Statement (SEIS) for the Colorado River Valley and Grand Junction Field Offices.

This packet contains supportive letters from the following entities and individuals:

- Representative Diana DeGette, Colorado's Congressional District 1
- State of Colorado, Department of Natural Resources and Department of Public Health and Environment
- Eagle County
- Pitkin County
- Routt County
- City of Glenwood Springs
- Town of Palisade
- The Mountain Pact and over 25 individual local elected officials
- Grand Valley Outdoor Recreation Coalition
- The Colorado Food and Farm Alliance and over 30 agricultural producers and related businesses
- Nearly 85 local business in Western Colorado

In addition to what's in contained in the packet, the conservation community generated comments from nearly 6,000 community members and submitted technical comments on behalf of the following organizations: Audubon Rockies, Center for Biological Diversity, Citizens for a Healthy Community, Colorado Wildlands Project, Conservation Colorado, Conservation Lands Foundation, Defenders of Wildlife, Earthjustice, Great Old Broads for Wilderness- Grand Junction Broadband, Living Rivers & Colorado Riverkeeper, National Parks Conservation Association, Rocky Mountain Wild, Sheep Mountain Alliance, Sierra Club, The Wilderness Society, Waterkeeper Alliance, Western Colorado Alliance, Western Watersheds Project, Wilderness Workshop, and WildEarth Guardians.

DIANA DeGETTE

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COMMITTEE ON
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ENERGY, CLIMATE, AND GRID SECURITY—
RANKING MEMBER

ENVIRONMENT, MANUFACTURING,
AND CRITICAL MINERALS
OVERSIGHT AND INVESTIGATIONS

Congress of the United States
House of Representatives

Washington, DC 20515

November 1, 2023

Mr. Greg Larson, District Manager
Bureau of Land Management – Upper Colorado River District
2518 H Road
Grand Junction, CO 81506

Re: Supplemental EIS (DOI-BLM-CO-G020-2022-0001-RMP-EIS)

Dear District Manager Larson,

Thank you for the opportunity to comment on the draft Colorado River Valley Field Office and Grand Junction Field Office Supplemental Environmental Impact Statements (EIS) (DOI-BLM-CO-G020-2022-0001-RMP-EIS) for the 2014 Colorado River Valley Field Office (CRVFO) Proposed Resource Management Plan (PRMP)/Final EIS and 2015 Grand Junction Field Office (GJFO) PRMP/Final EIS.

Among the alternatives you are considering for the PRMP, I write to urge your selection of Alternative F primarily because it eliminates new oil and gas activity to the furthest extent while at the same time offering new protections for valuable public lands along Colorado's Western Slope.

As a fourth-generation Coloradan, I care about preserving these pristine lands for other Coloradans and visitors to enjoy for many generations to come. As you may know, I am the prime sponsor of the Colorado Wilderness Act (H.R. 803 in the 117th Congress), which would designate 660,000 acres of public lands in 36 areas as federally-protected wilderness. First introduced in 1999, the Colorado Wilderness Act includes lands thoughtfully selected by local voices and has been vetted and refined over successive years. I intend to reintroduce an updated version in the coming weeks.

Certain units proposed for wilderness designation in the Colorado Wilderness Act fall within the planning area of Alternative F of the Supplemental EIS, including the Sewemup Mesa, the Palisade, Unaweep, South Bangs Canyon, North Bangs Canyon, Demaree Canyon, Little Book Cliffs, Grand Hogback, Assignment Ridge, Flat Tops Addition, Bull Gulch, Castle Peak, Pisgah West, and Pisgah East.

Notably in Alternative F, the Bureau of Land Management (BLM) recommends closing new oil and gas leasing in Sewemup Mesa, the Palisade, Unaweep, South Bangs Canyon, North Bangs Canyon, Demaree Canyon, Little Book Cliffs, Assignment Ridge, Flat Tops Addition, Bull Gulch, Castle Peak, Pisgah West and Pisgah East, and Grand Hogback. I support this recommendation and urge the BLM to include these closures in any final decision.

Additionally, I applaud the BLM's proposal to expand the Castle Peak Wilderness Study Area (WSA) as shown in Alternative F. In a February 2023 letter I co-led addressed to Secretary Haaland, which was signed by forty members of the U.S. House of Representatives, I called on the BLM to assert its authority under the Federal Land Policy and Management Act (FLPMA) Section 202 to designate new Wilderness Study Areas (WSAs) and to give priority to the designation of Areas of Critical Environmental Concern (ACECs). I urge the BLM to include the expansion of Castle Peak WSA in any final decision.

Finally, I strongly urge BLM to consider designating other lands with wilderness characteristics as Section 202 WSAs, especially lands proposed for wilderness designation in the Colorado Wilderness Act. Designating these additional areas as Wilderness Study Areas will ensure the protection of their wilderness characteristics and offer consistent and durable management prescriptions, while providing broader management flexibility than designated wilderness.

Thank you for your consideration of these comments on the draft SEIS, which will impact my constituents, Colorado's residents and visitors, as well as our environment for years to come.

Sincerely,

A handwritten signature in blue ink that reads "Diana DeGette". The signature is written in a cursive style with a clear, legible font.

Diana DeGette
Member of Congress



COLORADO
Department of Public
Health & Environment



COLORADO
Department of
Natural Resources

November 1, 2023

Doug Vilsack, Director
Colorado State Office
Bureau of Land Management
PO Box 151029
Lakewood, CO 80215

RE: Draft Supplemental EIS for CRVFO PRMP/Final EIS and GJFO PRMP/Final EIS

Dear Mr. Vilsack:

Thank you for your continued cooperation and collaboration with the State of Colorado (State or Colorado) on public lands management. Colorado is submitting the following comments and recommendations related to the draft supplemental environmental impact statement (EIS) for the 2014 Colorado River Valley Field Office (CRVFO) Proposed Resource Management Plan (PRMP)/Final EIS and 2015 Grand Junction Field Office (GJFO) PRMP/Final EIS.

Public lands contribute immensely to the quality of life and economy in Colorado. State officials work closely with the Bureau of Land Management (BLM), and other federal land management agencies to improve federal land management in Colorado. The supplemental EIS provides an important framework for the future management direction and use of BLM-administered lands in Colorado.

The BLM approved the RMPs and Records of Decision (RODs) for the CRVFO and GJFO in 2015. The combined decision areas have 1,946,900 acres with federal minerals. The purpose of this supplemental EIS is to broaden the range of alternatives considered in the 2014 CRVFO Final EIS and 2015 GJFO Final EIS with respect to the lands that are allocated as open or closed for oil and gas leasing. The purpose is also to provide additional air quality analysis for the fluid mineral management alternatives considered in the 2014 CRVFO Final EIS and the 2015 GJFO Final EIS and in this supplemental EIS. The need for this supplemental EIS is to comply with the District Court opinion and settlement agreement associated with the 2015 RMPs, and to consider new information and areas with tribal significance.

The Departments of Natural Resources and Public Health and Environment support the BLM's consideration of the new Alternatives E and F, which close the areas with no known, low, and medium oil and gas development to potential leasing and reduce the acres available for leasing in the high oil and gas development potential areas. Alternative E would close 568,300 acres in the CRVFO and 998,000 acres in the GJFO to future fluid mineral leasing. Alternative F would close 687,200 acres in the CRVFO and 1,157,000 acres in the GJFO to future fluid mineral

leasing. This supplemental EIS focuses future production in areas with the most benefit to federal taxpayers and limits surface disturbance and other environmental impacts in areas with low resource potential.

We appreciate the BLM's proactive approach to use its existing authority to designate and conserve areas of special environmental concern within the planning area. To this end, we support the proposed expansion of the Castle Peaks Wilderness Study Area (WSA) as well as the inclusion of Areas of Critical Environmental Concern (ACEC). These special designations will help ensure the conservation of natural resources and wilderness characteristics for all Coloradans to enjoy.

We appreciate the BLM's communication during the interagency scoping process for this Supplemental EIS and we respectfully offer the following comments. Air quality and climate are components of air resources which may be affected by BLM applications, activities, and resource management. Therefore, the BLM must consider and analyze the potential effects of BLM and BLM-authorized activities on air resources as part of the planning and decision making process. In particular, the activities surrounding oil and gas development are likely to have impacts related to air resources. The Supplemental EIS references the recently completed regional air quality modeling study to evaluate potential impacts due to federal oil, gas, and coal emissions sources for years 2028 and 2032.¹ We note that the study does not provide data or analysis specific to the CRVFO or GJFO. Neither the modeling study nor the Supplemental EIS provide an analysis or discussion of the differences in potential air quality impacts between the alternatives, and the Supplemental EIS does not include estimated well counts for the alternatives. The Supplemental EIS references sections 4.2.1 and 4.2.2 of the CRVFO Proposed RMP/Final EIS and Section 4.3.1 of the GJFO Proposed RMP/Final EIS as describing the potential impacts on air quality and related values that could be associated with Alternatives E and F. However, the scenarios included in the referenced RMPs/Final EISs are different from the new alternatives, and the Supplemental EIS does not describe why or how they are comparable. Therefore it is not possible to evaluate the potential air quality or climate change impacts associated with the alternatives or to assess whether or not additional lease stipulations or mitigations are warranted. We welcome the opportunity to consult with the BLM on the incorporation of such measures in the Final SEIS and future decision making.

We also appreciate BLM referencing its Environmental Justice Implementation Instruction Memorandum, which will apply to future implementation-level decisions in the CRVFO and GFO areas.² As recommended in the attachment to the Memorandum, we support the inclusion of a list of Environmental Justice considerations that should be conducted for individual projects implemented under the plan in the Supplemental EIS.³ We also strongly encourage BLM to

¹ BLM Western US Photochemical Air Quality Modeling for 2032. July 2023. Prepared by Ramboll Environmental,

https://www.blm.gov/sites/default/files/docs/2023-08/BLM_Regional_2032_Air_Quality_Modeling_Study_Report-Colorado.pdf

² BLM, IM2022-059, September 20, 2022, <https://www.blm.gov/policy/im2022-059>

³ BLM, Addressing Environmental Justice in NEPA Documents, page 5 and Section 16, https://www.blm.gov/sites/default/files/docs/2022-09/IM2022-059_att1.pdf

conduct early meaningful engagement before it is too late to avoid impacts or incorporate public input in the decision making process. When addressing environmental justice concerns, we encourage BLM to consider Colorado's definition of disproportionately impacted communities, as provided in HB23-1233.⁴ The Colorado EnviroScreen tool can be used to identify census block groups that meet Colorado's definition of a disproportionately impacted community within the planning and decision area. The Colorado EnviroScreen tool, guides, and data, including GIS shapefiles, are available at <https://cdphe.colorado.gov/enviroscreen>. Colorado agencies are also available to consult on environmental justice as it pertains to any future implementation-level decisions.

Lastly, we recognize and support BLM's decision to keep geothermal resources open to leasing. Colorado's Energy and Carbon Management Commission is in the process of developing a protective regulatory framework to govern deep geothermal activities in the state and we are working diligently to enable the responsible development of geothermal resources to contribute to the State's efforts to increase renewable energy development and reduce greenhouse gas emissions. Similarly, we recognize that BLM is developing an updated plan to guide responsible solar energy development on public lands through an updated Solar Programmatic Environmental Impact Statement which will help accelerate and continue momentum for the clean energy economy. We are hopeful that this process will enable additional solar development on public lands in Colorado in the future.

We are grateful for BLM's continued collaboration with the State to ensure responsible management of public lands and resources and meet State and federal energy and climate goals.

Sincerely,



Dan Gibbs
Executive Director
Department of Natural Resources



Trisha Oeth
Director of Environmental Health and Protection
Department of Public Health and Environment

⁴ Colorado Legislature, H.B. 1233, 2023 Regular Session,
https://leg.colorado.gov/sites/default/files/2023a_1233_signed.pdf



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November 1, 2023

Greg Larson, District Manager
BLM Upper Colorado River District
2815 H Road
Grand Junction, CO 81506

Re: Comments on Draft SEIS for the Colorado River Valley Field Office and Grand Junction Field Office Supplemental EIS (DOI-BLM-CO-G020-2022-0001-RMP-EIS)

Dear Mr. Larson,

Thank you for your work to revise portions of the Resource Management Plan for public lands in Eagle County through the Colorado River Valley Field Office and Grand Junction Field Office Supplemental EIS (SEIS). Eagle County is a cooperator in the planning process and submitted comments during the scoping period, as well as supplementary comments after the scoping period closed. This letter includes my feedback as Chair of the Eagle County Board of County Commissioners on the Draft SEIS.

The new alternatives E & F represent a step in the right direction. Both alternatives will scale down climate pollution while scaling up conservation - a win-win for our public lands, wildlife habitat, western communities and Colorado's future. However, Alternative F does significantly more to protect our local public lands from the unprecedented stresses of climate change, habitat loss, drought, and increased visitation and recreational pressures. This is why I strongly urge the BLM to select alternative F, or at the very minimum, include critical Areas of Critical Environmental Concern and other protections from alternative F (detailed below) into the alternative ultimately selected by the agency.

Conservation of our public lands is increasingly important to Eagle County residents and visitors. Protecting wildlands benefits wildlife, provides for more sustainable recreation and mitigates the impacts of climate change. Because federal public lands comprise so much of Eagle County's land area, we rely on federal land manager partners to work with us to maintain the integrity of these wildland habitats and watersheds. I look to the BLM to utilize legislative and administrative designations and other tools at your disposal.

Congressionally designated areas such as the Holy Cross and Eagle's Nest Wilderness areas are popular and cherished places, and the County also benefits from the protections provided through administrative management tools such as Inventoried Roadless Areas on our national forests and BLM's wilderness study areas (WSAs), Areas of Critical Environmental Concern (ACECs), Special Recreation Management Areas (SRMAs) and managed Lands with Wilderness Characteristics (LWC). These administrative tools provide durable protections and focused management to protect critical resources.



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I strongly support BLM's proposal to use administrative protections to manage wildlands in Eagle County under Alternative F. For example, I would like to see the Castle Peak Addition managed as a WSA under Section 202 of the Federal Land Policy and Management Act. 43 U.S.C. § 1712.¹ This would provide long term and meaningful protection for the unique wilderness characteristics that remain in Castle Peak. I also support continued WSA management for Bull Gulch and Hack Lake, and continued management to prioritize protection of wilderness characteristics for the Flat Tops Addition and Pisgah Mountain.

Decisions on the designation and management of WSAs and LWC's should be based on the latest and most accurate inventory of lands with wilderness characteristics. The existing LWC inventory that informed the 2016 Resource Management Plan was flawed and relied on outdated inventory guidance. In particular, the proposed expansion of Castle Peak WSA should designate all adjoining LWC consistent with updated inventory findings.

I further support BLM's proposal under Alternative F to protect several ACECs in Eagle County, including Blue Hill², Bull Gulch³, Deep Creek⁴, Abrams Creek⁵, Colorado River Seeps⁶, Dotsero Crater⁷, East Eagle Greater Sage-grouse

¹ See Draft SEIS at 3-122.

² Located northwest of Burns and west of McCoy. Designated as a sensitive area for cultural and Native American resources with the potential to contribute to understanding of history and prehistory. Also classified as a critical watershed due to severely erosive soils. Erosion could destroy and degrade cultural and water resources in the area. See U.S. Dept. of Interior, Bureau of Land Management, Glenwood & Kremmling Field Offices, *Glenwood Springs and Kremmling Field Offices RMP Evaluation of Proposed Areas of Critical Environmental Concern* (Nov. 2007), at 11. Available for download at https://eplanning.blm.gov/public_projects/lup/68506/110860/135752/21_Appendix_E_ACEC_Report.pdf.

³ See *id.*, at 11-12 (designated for high scenic value and to maintain the natural appearing landscape adjacent to the Colorado River. The area is characterized by diverse topography, unique geologic forms, and sharp contrasting colors. The area also retains habitat for sensitive plant species, including Harrington's Penstemon).

⁴ *Id.*, at 12 (designated to protect outstanding landforms within the canyon, vegetation and water features which give it high scenic value. The canyon is dramatic and unique. Several geologic faults and unusual erosional formations are found within the canyon, as well as a high concentration of cave and karst resources. The landscape maintains a high degree of naturalness. Meets the importance criteria for more than locally significant qualities and qualities that make the area fragile, sensitive, rare, irreplaceable, unique, and vulnerable to adverse change).

⁵ *Id.*, at 21-22 (nominated for rare and sensitive wildlife resources. Abrams Creek contains a genetically pure population of native, wild, naturally reproducing Colorado River cutthroat trout that have been identified as a Core Conservation Population. The watershed supports vital ecosystem processes and maintains crucial habitats important for the long-term survival of this fish species. Core Conservation Populations are important in the overall conservation of the species and are given the highest priority for protection. Given the genetic purity of these fish, the population is unique and irreplaceable).

⁶ *Id.*, at 25 (nominated to protect two significant plant communities: *Betula occidentalis*/Mesic grass and *Artemisia tridentata*/*Leymus cinereus*. These plant communities are in exemplary condition. They are rare within the state and relatively rare globally. The Colorado Natural Heritage Program (CNHP) indicated that "This may be one of the most pristine low elevation riparian areas in Eagle County").

⁷ *Id.*, at 15-16 (Dotsero Crater represents the youngest known volcanic event in Colorado estimated to be from approximately 4,150 to 4,700 years old. The distinct crater is approximately 800 feet deep and 1/3 mile across with an associated lava flow that extends almost one mile to the south crossing I-70).



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habitat⁸, Hardscrabble-Mayer Gulch⁹, and the McCoy Fan Delta¹⁰. These areas all retain the relevance and importance criteria necessary to qualify as ACECs, and the unique and sensitive values in these areas deserve special management attention to protect and prevent irreparable damage. If Alternative F is not chosen, at a minimum, I urge the BLM to incorporate protection of these areas into whichever alternative is selected.

Additionally, I support the oil and gas leasing closures proposed in Alternative F. As the Draft SEIS confirms, there is no federal oil and gas production within Eagle County, nor any reasonably foreseeable potential for development.¹¹ Closure of lands in Eagle County makes good sense. It will allow BLM to focus its limited resources on maintaining the values that make public lands in Eagle County such an important community resource, and it will eliminate any threat of speculative leasing that wastes agency resources without any real public benefit.

The broad closures considered in Alternative F also better align with science based climate targets. Eagle County is working to reduce climate emissions by 50% by 2030.¹² Our community is already experiencing the negative consequences of climate change. From impacts to our recreation-based economy and our water supply, to local wildlife populations and threats from wildfire, we are on the front lines. As a nation, the time for us to act to avoid the most severe impacts from climate change is now. Since “[f]ossil fuel production on public lands accounts for nearly a quarter of all U.S. greenhouse gas emissions,”¹³ the BLM should at least consider closing the entire planning area to new leasing.

⁸ *Id.*, at 31 (nominated to protect Greater sage grouse habitat and a small population of Greater sage grouse that still rely on lands in northern Eagle County. This habitat deserves heightened protection and this population of birds may require special management to ensure survival).

⁹ *Id.*, at 20-21 (nominated to protect one of the highest known concentrations of Harrington’s penstemon).

¹⁰ *Id.*, at 16 (the McCoy Fan Delta consists of fluvial and marine deposits record depositional events that occurred along the western margin of the Ancestral Front Range. Marine deposits in the area have yielded abundant fossils that include invertebrates, vertebrates, and plant species. The McCoy fan delta is among the best exposed deltaic deposits in the Rocky Mountains and allows for study and observation of paleontological resources and the sedimentary processes that occurred in the geologic past).

¹¹ See Draft SEIS, Table 3.9-11, at 3-160.

¹² See Eagle County “Climate Action” webpage (“Resiliency’s Climate Action team works to implement the Eagle County Environmental Policy and Climate Action Plan in county operations and within the larger community. Our shared community goal is to reduce greenhouse gas emissions 50% percent by 2030.”), available at https://www.eaglecounty.us/departments_services/resiliency/climate_action/index.php#collapse4212b0.

¹³ U.S. Dept. of Interior, Fact Sheet: President Biden to Take Action to Uphold Commitment to Restore Balance on Public Lands and Waters, Invest in Clean Energy Future (Jan. 27, 2021), available at <https://www.doi.gov/pressreleases/fact-sheet-president-biden-take-action-uphold-commitment-restore-balance-public-lands#:~:text=Fossil%20fuel%20extraction%20on%20public.threatens%20cultural%20and%20sacred%20sites.>



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I commend the BLM as it seeks to increase conservation emphasis and balance management in furtherance of its important “multiple use and sustained yield” mission. I urge the BLM to capitalize on the opportunity presented in this SEIS process to ensure meaningful protections for the public lands that are such an important asset to local communities, and to ensure that the updated Resource Management Plans help us cope with the climate crises rather than exacerbating it. I am grateful for Eagle County’s partnership with the BLM and appreciate your consideration of my comments on the draft SEIS.

Sincerely,

Kathy Chandler-Henry

Chair, Eagle County Board of Commissioners



COUNTY COMMISSIONERS

November 1, 2023

Submitted Electronically at <https://eplanning.blm.gov/eplanning-ui/project/2016085/510>

Greg Larson, BLM Upper Colorado River District Manager
BLM Upper Colorado River District
Attn: Supplemental EIS
2518 H Road
Grand Junction, CO 81506

Re: Pitkin County Comments on CRVFO RMP Supplemental Draft EIS (DOI-BLM-CO-G020-2022-0001-RMP-EIS)

Dear District Manager Larson:

Thank you for the opportunity to comment on the Colorado River Valley Field Office Supplemental Draft Resource Management Plan. ("RMP") Environmental Impact Statement ("EIS"). The following comments relate to those portions of the RMP within the territorial boundaries of Pitkin County.

The County recognizes and appreciates the development and addition of the new alternatives, Alternatives E & F, to the RMP EIS process. These alternatives provide a route for the agency to reduce climate pollution while increasing conservation - ideal for our public lands, wildlife habitat, western communities and Colorado's future. The County offers these comments in the spirit of further improving the analysis and alternatives, and looks forward to our continuing partnership with the Forest Service on this and the many other issues in which we have shared interests. We reiterate our commitment as a cooperator in the planning process and this letter builds upon our submitted comments and participation during the scoping period.

Pitkin County continues to support the closure of lands in the Thompson Divide to future leasing. While Pitkin County recognizes and appreciates the substantial closure of lands to leasing within Pitkin County identified in Alternative E, we support Alternative F.¹ Polling shows strong support for conservation on our public lands: 71% of Coloradans "prefer that leaders place more emphasis on protecting water, air, wildlife habitat, and recreation opportunities over maximizing the amount of land available for drilling and mining."² Pitkin County residents have strongly prioritized protection of public lands from the unprecedented stresses

¹ In our review of the GIS shapefiles for Alternative F within Pitkin County, there are tiny areas which appear as leasable between Thompson Creek Road and South Thompson Creek Road as shown in blue on Ex. A. These areas are not visible on the static pdf maps for Alternative F. We believe these are remnants of polygons from a larger GIS geoprocessing operation and not leasable areas under Alternative F. If this understanding is incorrect, let us know as it will materially change our position.

² <https://www.coloradocollege.edu/newsevents/newsroom/2023/state-of-the-rockies-2023-poll-shows-widespread-support-for-conservation-despite-a-rise-in-other-concerns.html>



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of climate change, habitat loss and deleterious wildlife impacts, drought and increased visitation pressures. We are regularly reminded by our shared constituents that conservation of our public lands is critically important. Protecting wildlands benefits wildlife, provides for more sustainable recreation, and mitigates the impacts of climate change. Because federal public lands comprise so much of Pitkin County's land area, the County relies on federal land manager partners to maintain the integrity of these wildland habitats and watersheds, and to use legislative and administrative designations and other tools at their disposal. Clean air, water and healthy public lands are among our most important assets, and Pitkin County looks forward to ensuring that this long term management plan will help protect these values and uses.

Outdoor recreation and amenity development play an enormous role in Pitkin County's economy. The environmental consequences of by oil and gas come at a significant economic cost. The Colorado Fiscal Institute estimates that between 2020-2030 more than \$13 billion in economic damages will result from CO2 emissions emitted by Colorado's oil and gas industry assuming the CO2 emission targets set by the state are met.³ In the event state level emissions reductions are not met, economic damages will be higher.

We support Alternative F in fully closing lands in the Thompson Divide to future leasing during the pendency of the RMP and including the Thompson Divide Area of Critical Environmental Concern ("ACEC") and the surrounding Lands with Wilderness Characteristics ("LWC"). We also support protection for sensitive plant species at the top of the Crown as proposed within the Crown Ridge ACEC in Alternative F. We reiterate our position that a complete closure to future leasing would be prudent. Pitkin County is working to reduce climate emissions and urging partners to make similar commitments.⁴ This aligns with science based climate targets. Since "[f]ossil fuel production on public lands accounts for nearly a quarter of all U.S. greenhouse gas emissions,"⁵ it would be advisable for the BLM to consider closing the planning area to new leasing in a "no leasing alternative." The non-inclusion of a full closure alternative fails to wholly address the reality of the current and future climate. We recognize Alternative E has been chosen as the preferred alternative, but we also urge the BLM to consider developing another alternative

³ See <https://www.coloradofiscal.org/wp-content/uploads/2023/01/OG-paper-1-5-23-final.pdf>

⁴ See Pitkin County "Climate Action Plan" webpage ("The Pitkin County Climate Action Plan focuses on County agencies and initiatives that can reduce emissions. This plan makes an important contribution to emissions reduction and shows the County's leadership. The plan was developed to serve as a guide for departments to drive robust and meaningful reductions."), available at <https://climate.colorado.gov/pitkin-county-climate-actionplan#:~:text=The%20Pitkin%20County%20Climate%20Action,drive%20robust%20and%20meaningful%20reductions.>

⁵ U.S. Dept. of Interior, Fact Sheet: President Biden to Take Action to Uphold Commitment to Restore Balance on Public Lands and Waters, Invest in Clean Energy Future (Jan. 27, 2021), available at <https://www.doi.gov/pressreleases/fact-sheet-president-biden-take-action-uphold-commitment-restore-balance-public-lands#:~:text=Fossil%20fuel%20extraction%20on%20public,threatens%20cultural%20and%20sacred%20sites.>



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which would mix-and-match components from Alternative E and F to fully close lands in the RMP to future oil and gas leasing in the Thompson Divide (TDACEC and adjacent land as in Alternative F) in addition to the removal from leasing of other lands in the Crystal and Roaring Fork River watersheds currently in Alternative E.

Thank you for the opportunity to provide comments. We look forward to continued robust engagement with the BLM on this issue, which remains of significant concern to Pitkin County.

PITKIN COUNTY ATTORNEY’S OFFICE

BOARD OF COUNTY COMMISSIONERS OF PITKIN COUNTY, COLORADO

Respectfully submitted,

Sincerely,

Laura C. Makar

Francie Jacober, Chair

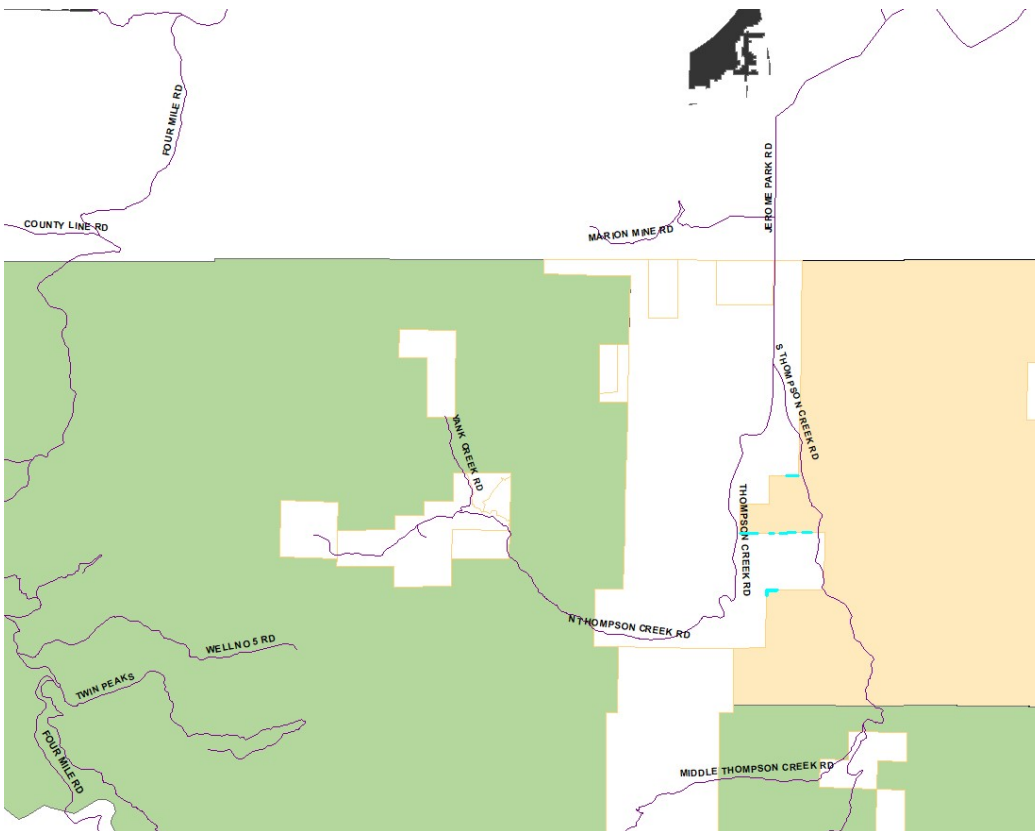
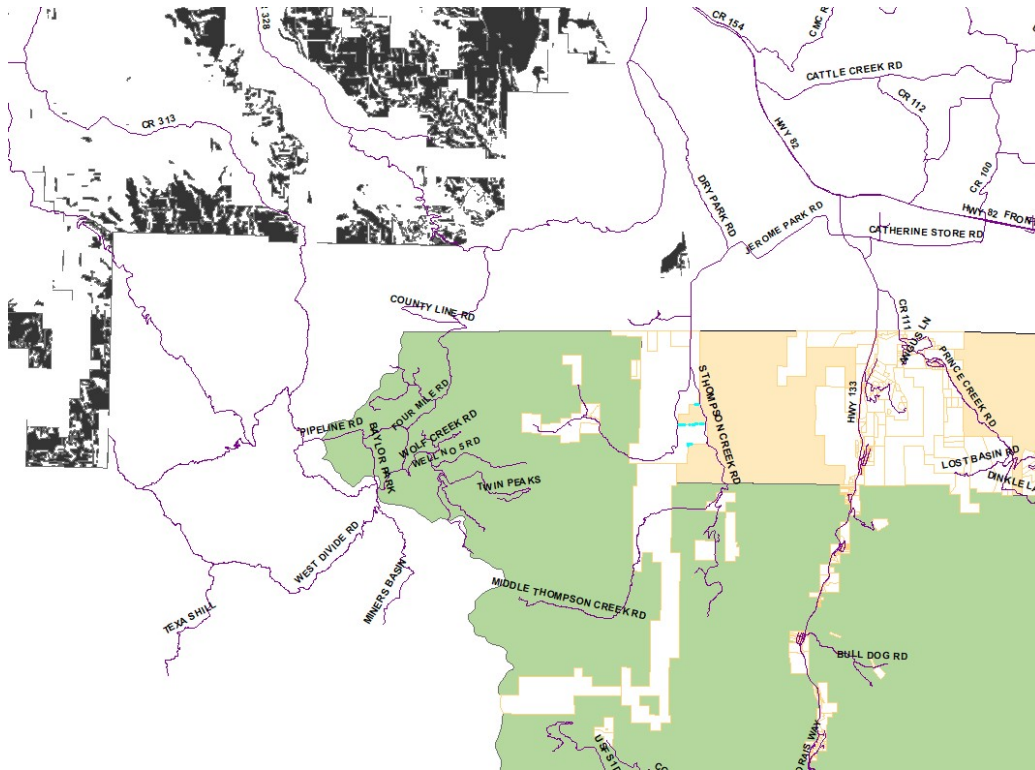
Greg Poschman, Vice Chair

Patti Clapper, Commissioner

Kelly McNicholas Kury, Commissioner

Steven F. Child, Commissioner

Exhibit A



October 31, 2023

Greg Larson, District Manager
BLM Upper Colorado River District
2815 H Road
Grand Junction, CO 81506

Re: Comments on the BLM Colorado River Valley Field Office and Grand Junction Field Office Draft Supplemental EIS (DOI-BLM-CO-G020-2022-0001-RMP-EIS)

Dear Mr. Larson,

Thank you for the opportunity to continue our engagement on the Bureau of Land Management's (BLM) Colorado River Valley Field Office and Grand Junction Field Office Supplemental Environmental Impact Statement (SEIS) process. These comments build upon previous comments submitted during the scoping phase of this planning process.

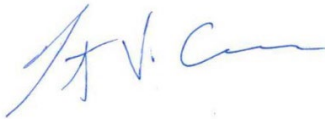
Public lands make up nearly half of Routt County's total surface area and are an integral part to our economy and the lifestyles and health of our residents. Yet, these public lands are under increasing stresses from climate change, development pressures and increased visitation. Over 33,000 acres of BLM-managed lands in Routt County, plus an equal number of split-estate BLM-managed minerals, will be impacted by the decisions made in this planning process. This acreage includes critical big game and greater sage grouse habitat, and highly-valued primitive recreational areas such as King Mountain Special Recreational Management Area.

Oil and gas development is not a public lands use that significantly contributes to the Routt County economy. We are pleased to see that BLM has included new conservation measures in Alternative E and Alternative F of the DEIS which would better align management of these public lands with the realities of our economy and the values of our residents by closing BLM-managed public lands and minerals in the county to future oil and gas leasing, while designating a new Area of Critical Environmental Concern (ACEC) for greater sage-grouse.

Additionally, Routt County supports BLM's decision to utilize its authority under Section 202 of the Federal Land Policy and Management Act (FLPMA) to protect Wilderness Study Areas (WSAs) in Alternative F. WSAs represent a meaningful tool that BLM should use when appropriate. Protected wilderness-quality lands allows for adaptive management, which is critical to supporting climate resilient landscapes that may continue to support robust wildlife populations, healthy watersheds, and a diverse recreational experience on public lands.

We commend BLM for analyzing new alternatives that seek to increase protections of BLM lands from oil and gas development, and to strike a balance in furtherance of its “multiple use and sustained yield mission”. We appreciate the opportunity to speak up in support of these efforts and strongly urge BLM to retain the conservation provisions in its final decision.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Timothy V. Corrigan'.

Timothy V. Corrigan
District I

A handwritten signature in blue ink, appearing to read 'Tim Redmond'.

Tim Redmond
District II

A handwritten signature in blue ink, appearing to read 'Sonja Macys'.

Sonja Macys
District III



November 1, 2023

Greg Larson, District Manager
BLM Upper Colorado River District
2815 H Road
Grand Junction, CO 81506



RE: Comments on the Colorado River Valley Field Office and Grand Junction Field Office
Draft Supplemental EIS (DOI-BLM-CO-G020-2022-0001-RMP-EIS)

Dear Mr. Larson,

I write on behalf of the City of Glenwood Springs to comment on the Bureau of Land Management's (BLM) draft Supplemental Environmental Impact Statement (DSEIS) for the Colorado River Valley Field Office (CRVFO) and Grand Junction Field Office (GJFO). We incorporate by this reference the City's scoping comment letter submitted jointly with the City of Aspen, Eagle County, and Pitkin County (Joint Scoping Letter). We thank you for this opportunity to provide comments on the proposed SEIS.

Glenwood Springs is the original tourism and outdoor recreation-based economy in Colorado boasting natural hot springs, the confluence of the Colorado and Roaring Fork Rivers, and numerous summer and winter trail-based recreational opportunities. These activities occur on City-owned open space and federal public lands alike – between which many users do not distinguish. In order to maintain and grow this sector of our economy, Conservation of regionally significant federal public lands is a high priority for the City. We appreciate the importance of the oil and gas sector to the greater Garfield County and regional economies but at the same time are committed to lowering greenhouse gas emissions from municipal operations and through initiatives we support. We appreciate BLM's efforts through this planning process to strike an appropriate balance

We are pleased to see BLM addressing many of the issues identified in the Joint Scoping Letter in both Alternatives E and F. This includes significant reductions in climate change inducing pollution and increases in public land conservation measures. Protective designations are important because they help to mitigate the climate crisis by providing essential core habitat and migration corridors that enable wildlife species and entire ecosystems to survive and thrive.

In particular we support additional protections for land containing wilderness characteristics by exercising BLM's full authority under Sec. 202 of the Federal Land Policy and Management Act (FLPMA). Many of these special places contain important wildlife habitat and recreational opportunities that our residents and visitors alike use and cherish. Places like Deep Creek, Castle Peak, Grand Hogback, Thompson Creek, and the Crown are regionally significant landscapes and features that warrant maximum protection. And closer to Glenwood Springs, we fully support the designation and protection of the Glenwood Springs Debris Flow Area of Critical Environmental Concern (ACEC) to ensure that the City and its watersheds are protected from development in these steep and unstable areas.

With this proposed management plan, the BLM has an opportunity to scale down climate pollution while scaling up conservation and offsetting oil and gas development - existing and future – with management considerations proposed in the draft like protecting additional lands with wilderness characteristics, Areas of Critical Environmental Concern, wildlife habitat areas and migration corridors. We hope BLM takes full advantage of this opportunity.

Sincerely,

Ingrid Wussow
Mayor



175 E 3rd Street
P.O. Box 128
Palisade, CO 81526

Phone: (970) 464-5602
Fax: (970) 464-5609
palisade.colorado.gov

ADMINISTRATION

November 1, 2023

Greg Larson, District Manager
BLM Upper Colorado River District
2815 H Road
Grand Junction, CO 81506

RE: Comments on the Colorado River Valley Field Office and Grand Junction Field Office Draft Supplemental EIS (DOI-BLM-CO-G020-2022-0001-RMP-EIS)

Dear Director Larson,

I write on behalf of the Town of Palisade to provide comment on the Bureau of Land Management's (BLM) draft Supplemental Environmental Impact Statement (DSEIS) for the Colorado River Valley Field Office (CRVFO) and Grand Junction Field Office (GJFO). Palisade has several interests in this draft plan including protection of its municipal watershed and the management of regionally significant public land recreational opportunities and wildlife habitats.

We fully support the closure of the Palisade Municipal Watershed to fluid mineral leasing as contemplated in Alternative F and explained on page 3-34 of the DSEIS. The town owns significant surface acreage in its watershed containing infrastructure that provides clean drinking water to its residents. The area is managed pursuant to C.R.S. 31-15-707(l)(b) and Chapter 14 of the Palisade Municipal Code. However, some of this area is split estate with subsurface minerals managed by the federal government. Additionally, public lands further upstream from town-owned property feed into the town's system and have been threatened by oil and gas development in the past. As such, we hope to see this larger watershed basin fully closed to future leasing activities to protect one of our town's most important resources – water.

We are also glad to see additional protective measures being taken in Alternatives E and F to protect regionally significant landscapes and wildlife habitats. These designations are important because they provide essential core habitat and migration corridors that enable wildlife species

and entire ecosystems to survive and thrive. As an agritourism hub we appreciate the benefits that public land protections bring to our economy and community.

Thank you for this opportunity to comment on the DSEIS and for your efforts to improve public land management in western Colorado.

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg Mikolai". The signature is fluid and cursive, with the first name "Greg" and last name "Mikolai" clearly distinguishable.

Greg Mikolai, Mayor



The Mountain Pact

Greg Larson
BLM District Manager
Attn: Supplemental EIS
2518 H Road, Grand Junction, CO 81506

CC: Doug Vilsack
BLM Colorado State Director
PO Box 151029
Lakewood, CO 80215

Senator Michael Bennet, Senator John Hickenlooper, Representative Joe Neguse

Dear Mr. Larsen,

The below listed local elected officials, who represent communities within the Colorado River Valley and Grand Junction Bureau of Land Management (BLM) Field Offices, are writing to urge adoption of the management proposed in Alternative F of the [draft Supplemental Environmental Impact Statement \(SEIS\)](#), which provides a more balanced approach to public lands management for the region. Doing so will protect some of our communities' critical water resources, Indigenous cultural sites, important wildlife habitat, and treasured recreation areas.

Many of the BLM lands located in our region are favorites for visitors and residents alike for camping, fishing, mountain biking, and hiking. Yet, many of these areas were left open to oil and gas leasing in the previous Resource Management Plans for the Colorado River Valley and Grand Junction Field Offices. We applaud the BLM for listening to the voices of our communities during the scoping portion of this process and developing [Alternative E](#), which proposes closing lands with no, low, and medium oil and gas potential in addition to other high value recreation and conservation lands like Lands with Wilderness Characteristics, Areas of Critical Environmental Concern, and Special Recreation Management Areas to new oil and gas development, while simultaneously proposing important new conservation protections for wildlands and wildlife.

Some examples of special areas that Alternative F proposes closing to oil and gas that should be incorporated into the final plan include:

- The Grand Hogback
- Red Hill
- The Crown
- Thompson Creek
- Lower Dolores River canyons
- The Book Cliffs
- The North Fruita Desert
- The Upper Colorado River corridor

While the BLM completes a more thorough analysis of the impacts of federal oil and gas development on our climate and communities, we urge you to consider that [fossil fuel extraction on public lands generates nearly 25 percent of the United States' climate change causing emissions](#). Increasing conservation on our public lands is a critical tool for climate mitigation and adaptation for our region. Protected public lands provide essential core habitat and migration corridors that enable wildlife species and entire ecosystems to survive and thrive. The Biden-Harris administration has established

an ambitious goal to conserve 30% of our nation's lands and waters by 2030 in order to safeguard biodiversity against the threat of climate change, and this planning process can be a key piece for Colorado.

Alternative F most effectively scales down climate pollution, while scaling up conservation by designating new Areas of Critical Environmental Conservation and protecting additional Lands with Wilderness Characteristics. It also proposes the expansion of the Castle Peak Wilderness Study Area in Eagle County. We are supportive of these management considerations, and ask the BLM to consider designating additional Wilderness Study Areas as appropriate for wilderness quality lands in the planning area.

By adopting the management proposed in Alternative F, the Bureau of Land Management has an opportunity to embrace the America the Beautiful initiative and help conserve and restore more of our nation's lands and waters for residents, wildlife, and future generations. Limiting oil and gas development on BLM lands, identifying and protecting additional Lands with Wilderness Characteristics as well as increasing the designations of Areas of Critical Environmental Concern (ACECs) is essential to providing continued opportunities for outdoor recreation, equitable access to nature, and ultimately safeguarding the climate.

As the largest land manager in the nation, the Bureau of Land Management must play a leading role in protecting our public lands for the future. [71% of Coloradans “prefer that leaders place more emphasis on protecting water, air, wildlife habitat, and recreation opportunities over maximizing the amount of land available for drilling and mining.”](#)

Protected public lands are tremendous assets to Western Colorado communities. They play a critical role in our way of life. They help make the communities where we live what they are, while contributing to a healthier and better tomorrow for future generations. Alternative F provides the best path forward for lands under the management of the Colorado River Valley and Grand Junction Field Offices to support our outdoor recreation economy, mitigate the impacts of climate change, and preserve nature.

Sincerely,

Mayor Torre, City of Aspen, Colorado

Mayor Pro-Tem John Doyle, City of Aspen, Colorado

Council Member Sam Rose, City of Aspen, Colorado

Former Mayor Sarah Smith-Hymes, Town of Avon, Colorado

Mayor Bill Kane, Town of Basalt, Colorado

Mayor Pro Tem David Knight, Town of Basalt, Colorado

Council Member Angela Anderson, Town of Basalt, Colorado

Council Member Glenn Drummond, Town of Basalt, Colorado

Council Member Elyse Hottel, Town of Basalt, Colorado

Council Member Dieter Schindler, Town of Basalt, Colorado

Council Member Ryan Slack, Town of Basalt, Colorado

Mayor Ben Bohmfalk, Town of Carbondale, Colorado

Town Trustee Colin Laird, Town of Carbondale, Colorado

Chair of the Board of Commissioners Kathy Chandler-Henry, Eagle County, Colorado

Council Member Geoff Grimmer, Town of Eagle, Colorado

Mayor Ingrid Wussow, City of Glenwood Springs, Colorado

Council Member and former Mayor Jonathan Godes, City of Glenwood Springs, Colorado

Council Member Scott Beilfuss, City of Grand Junction, Colorado

Council Member Randall Reitz, City of Grand Junction, Colorado

Council Member Caitlin Carey, Town of New Castle, Colorado

County Commissioner Francie Jacober, Pitkin County, Colorado

County Commissioner Greg Poschman, Pitkin County, Colorado

County Commissioner Patti Clapper, Pitkin County, Colorado

County Commissioner Kelly McNicholas Kury, Pitkin County, Colorado

County Commissioner Steve Child, Pitkin County, Colorado

Council Member Sean Strode, City of Rifle, Colorado



November 1, 2023

Bureau of Land Management - Upper Colorado River District
Attn: Greg Larson
2518 H Road
Grand Junction, CO 81506

Re: Supplemental EIS (DOI-BLM-CO-G020-2022-0001-RMP-EIS)
Submitted via e-planning

Dear Greg,

Thank you for the opportunity to comment on the draft of the Colorado River Valley Field Office and Grand Junction Field Office Supplemental EIS (DOI-BLM-CO-G020-2022-0001-RMP-EIS).

The Outdoor Recreation Coalition of the Grand Valley (ORC) and its members are stakeholders in the public lands administered by the Bureau of Land Management. The ORC was created to expand and enhance the Grand Valley's economy through collaboration and promotion of outdoor recreation businesses. These businesses include dozens of service providers, retailers, manufacturers, and organizations. We understand that trails and outdoor recreation opportunities foster business development and expansion as well as promote a growing tourism industry, a high quality of life, and a healthier community.

The BLM's Colorado River Valley & Grand Junction Field Office Supplemental EIS proposes closing to leasing for drilling lands with lower or no potential for oil and gas development while preserving the opportunity for development in places with existing leases, infrastructure, and the most promising resources. The plan marks a more balanced approach—one that recognizes the importance of preserving and utilizing resources on the surface of our public lands that our communities and regional economy rely on today.

The outdoor recreation sector is an economic powerhouse that has helped drive the rapid diversification of our regional economy. Yes, visitors come to go mountain biking, rock climbing, skiing, or fishing; and these visitors bring their wallets, injecting vital funds into our local businesses. But it goes much further: outdoor recreation fuels manufacturing and other ancillary industries to the Western Slope. The outdoor recreation amenities that attract visitors also attract new businesses, young families, and a diverse workforce who want a great place to live, work, and play.

In a recent survey of Mesa County residents, over 80% said that outdoor recreation is the most or one of the most important factor(s) in their choice to live here. A 2022 Colorado Mesa University report found that tourism, outdoor recreation and related industries accounted for 11% of jobs in our county and a total economic impact of almost a quarter of a billion dollars. By fostering and preserving our natural assets, we ensure that this economic engine not only survives but thrives. This means more jobs, more opportunities for growth, and more revenue for our communities.

Beyond economics, our communities benefit significantly from the prioritization of outdoor recreation and conservation. The quality of life in our region is closely tied to the accessibility of public lands and the recreational opportunities they offer. Whether it's a family hike through the Grand Mesa, a weekend camping trip along the Colorado River, or mountain biking in the North Fruita Desert, our public lands provide the perfect escape from urban life, promoting physical and mental well-being.

Moreover, outdoor activities foster a strong sense of community. They create shared experiences that bring locals together and encourage us to protect our cherished landscapes. In turn, these recreational opportunities attract new residents who are eager to embrace our unique lifestyle and natural beauty. By nurturing a thriving outdoor culture, we not only retain our current residents but also welcome newcomers, contributing to the vibrancy and connectedness of our communities.

Nearby public lands support a diverse range of ecosystems, providing habitats for rare and endangered species, including the Colorado River native fish, greater sage-grouse and the Silverspot butterfly. By safeguarding these lands, we protect these species and their critical habitats. We also ensure clean water, which is essential for agriculture and the local economy. By responsibly managing our lands, we protect our watersheds, securing a sustainable water supply for our region's future.

In Grand Junction and Mesa County, we stand on the cusp of a brighter future. The breathtaking landscapes and recreational opportunities here are unmatched, attracting visitors and residents who invigorate our economy and community bonds. The decision to close large tracts to oil and gas leasing with little to no potential for production recognizes the expansive economic conditions that nurture diversification and sustainability to build a path towards greater long-term prosperity and resilience.

As local outdoor business leaders, we believe in the power of collaboration. Working hand in hand with government agencies, community organizations, and environmental advocates, we can ensure that Western Colorado's public lands remain a source of inspiration, economic vitality, and ecological health for generations to come. With thoughtful management of outdoor recreation and conservation on our public lands, we are not only investing in our own businesses but also in the enduring legacy of this remarkable region. BLM's new plan helps to ensure that we are adequately protecting recreation and conservation on Mesa County's public lands.

Sarah Shrader, President
Grand Valley Outdoor Recreation Coalition

Farm & Food Organizations, Operators and Businesses comment letter to BLM

To: U.S. Department of Interior
Bureau of Land Management

Attn: Supplemental EIS
BLM Upper Colorado River District Office
2815 H Rd.
Grand Junction, CO 81506

November 1, 2023

We, the following organizations and undersigned farms, ranches, businesses and individuals, submit this letter in support of the conservation-based management described in Alternative F of the Piceance Supplemental Environmental Impact Statement (Piceance SEIS). Our public lands provide tremendous value to western Colorado communities, and to those of us who live and work here.

Agriculture everywhere relies on the same four things: sun, soil, water, and hard work. But the relationship of those things to each other, and to our ability to continue farming and prospering in the U.S. Southwest must look different in the future than it does today.

Colorado deserves a plan that ensures public lands and resources are managed for their long-term sustainability, not one that would continue business-as-usual that prioritizes speculative oil and gas leasing above other values and users.

This plan should prescribe management that helps rebalance agency priorities to better ensure the long-term viability of western Colorado beyond just the 20-year plan framework. Science states unequivocally that we have a rapidly closing window for action to avert even worse impacts from climate change. This plan should, and Alternative F would, help provide the grounding for that urgently needed response.

Although this is just the draft phase of the plan, the direction laid out in Alternative F does several important things that we support.

1. ***Scales up conservation and scales down fossil-fuel development on our public lands*** These steps are the two most critical and effective strategies to mitigate and adapt to increasing temperatures and risks of drought from climate change.
2. ***Listens and responds to years of community input, comment and action from farmers, townspeople and visitors:*** Residents from across western Colorado, from Eagle to Fruita, Grand Junction and Glenwood Springs, have called for years on the BLM to prioritize conservation over energy extraction. For agritourism businesses, and the farms that support them, conservation of public lands protects natural capital that brings visitors, provides more certainty, and secures water supplies.
3. ***Aligns public lands management with the future not the past:*** Our success at protecting natural capital will be of far greater value to the future than will have been one company's profits from speculative leasing or oil and gas drilling and extraction.

The values these lands contribute to replenish our water supplies, secure wildlife habitat, and attract visitors, for example, are already of greater value than their use for oil and gas development. Western Slope residents like their counterparts across the state and nation favor conservation-based management of public lands as numerous polls, surveys and agency comment periods have shown. Oil and gas development is, of course, highly impactful and degrades other values and impacts other users.

Conservation Promotes Farm Resilience

The landscape is connected. The animals, the water, the soil transported, the mudflows, the wildfires, none remain on this or that side of an agency line because of a map. And so too the management of public lands impacts our operations and private lands, our water sources and supplies, the canals and ditches, the quality of the environment which impacts the quality of our products and the perception of it as well.

The conservation of these things, of the natural capital that make farming, and life here possible – for instance watershed protections that allow source areas to be replenished, to flow clean, to water crops and towns - will only grow more valuable as the years of this plan tick past. We support Alternative F because it promotes farm resilience.

Conservation Boosts Food and Water Security

Resilient farms support greater food security. This is true both locally, and across the consumer market. Healthy lands and soils provide more nutritious food. Conservation-oriented land management also supports water security.

Conservation Supports Climate Action

Preparing for climate change by strengthening resilience to secure our food systems and water supplies will also help mitigate against this threat becoming even far worse. Healthy lands, healthy soils, healthy forests, all boost watershed health and promote greater drought resilience.

Regenerative agriculture and other farming practices can also help boost the natural carbon cycle and increase carbon sequestration in natural systems and processes. And this is true on our public lands, conservation of natural places is a leading priority to stabilizing our climate. But this benefit reaches far beyond just the federal estate, and by protecting the natural landscapes on our public lands both the climate and all downstream users will benefit today and in the future as well.

The best ways to address climate change is to eliminate emissions and through conservation. Other strategies will fail unless we also do these two things. By reducing the availability of public lands for fossil fuel development and scaling up conservation the BLM is taking the two most important steps it can to address this crisis threatening the Southwest and world.

Conservation Strengthens Rural Economies for the 21st Century

Protecting natural resources and values they provide protects the water supplies and other natural systems our farms rely upon, and this supports the workers and the businesses that rely on these farmers. But conservation of public lands also protects the golden goose that attracts the visitors who shop at our markets, stop by our wineries, or enjoy a farm to table meal at one of our cafes.

People come here to raft or hunt, and they stay a few extra days to enjoy some music or farm tours. All of this economic activity and all it helps to generate, and our operations would be diminished through the development or degradation of the public lands that surround us.

We urge that the Bureau of Land Management look to the future, to sustaining farms and rural Colorado for the long-term, and to adopt the conservation oriented vision of Alternative F in the Piceance SEIS.

Thank you,



Pete Kolbenschlager
Colorado Farm & Food Alliance

Rita Mary Hennigan
UpRoot Colorado

Jim Brett
Slow Food Western Slope

Jeff Wagner
Groundwork

And also submitted on behalf of the following:

Brian Adams, Green Junction Farmstead
Lisa Ganora, Elderberry's Farm LLC
Teri Walker, Walker Ranch
Emma Kottenstette, Farm Runners
Steven Morris, Blue Bird
Genevieve Villamizar, Native Grasses & Forbs LLC at Rivendell Farm
Tony Prendergast, XK Bar Ranch, Sunshine Beef
Eli Wolcott, Radiance Farms
John Holder, Double Trouble Farm
Amy C. Hayutin, Hayutin Farm
Julie Bennett, Qutori Wines and Vineyards
Doug Beall, Rancho Largo
Alicia Michelsen, Apothecary Gardens
Brent Helleckson, Stone Cottage Cellars
Harper Kaufman, Two Roots Farm

Farm & Food Organizations, Operators and Businesses comment letter to BLM

Sunny Morehouse, Arize Botanicals
Lesandre Barley, Rub n Restore, Inc.
Sarah Johnsen, Serendipitous Entertainment
Rita Clagett, Mirador Eco-Retreat
Cdr. Dona Willoughby, Cosmic Gardens
Susan Friar, Gaias Creations
Parker Nieslanik, Ranch
Louis Hayes, Louie's Pizza
Chris Dalbow, Dalbow Enterprises
Edna Miller
Mary Jursinovic
Elizabeth Roscoe
Katherine Curry
Katherine Delbaugh

November 1, 2023

Greg Larson, District Manager
BLM Upper Colorado River District
2815 H Road
Grand Junction, CO 81506
Submitted via eplanning.blm.gov

Attention: DOI-BLM-CO-G020-2022-0001-RMP-EIS

Re: Colorado River Valley Field Office and Grand Junction Field Office Supplemental Environmental Impact Statement

We, the undersigned businesses are writing in support of the Bureau of Land Management's proposal for lands in the Colorado River Valley and Grand Junction field offices, as outlined in Alternative F of the draft Supplemental Environmental Impact Statement. This plan would better balance conservation, recreation, and a host of other public land values that were often overlooked in favor of oil and gas development. The economic stability of the Western Slope, and our businesses, are dependent on access and conservation of the spectacular mesas, canyons, and high desert that offers invaluable recreational opportunities and vital habitat for many important wildlife species.

We own and operate businesses at the heart of recreation and tourism based economies across the Western Slope. People come here for the skiing, biking, hiking, camping, fishing, hunting, boating, off-roading, and opportunities to seek solitude on the lands surrounding us. These same people are sustaining our businesses and bringing much needed resources we would not see if these lands were locked-up by energy companies.

While our own financial statements can attest to the importance of public land access and recreation, a 2022 Colorado Mesa University study detailed how tourism and outdoor recreation added \$322 million in gross domestic revenue for Mesa County alone. When including supply chains and other spending, the figure rises to \$484 million—over 7% of our local economy. Outdoor recreation accounted for 8.4% of direct jobs in the county and another 2.6% of indirect jobs. These jobs are critical for families who call the Western Slope home.

These figures are not unique to Mesa County. Every community in the planning area is positively impacted by outdoor recreation and it will continue to be a driving factor for how our businesses invest and grow in the future. We firmly believe that conservation of our public lands plays a crucial role in this. It is important that the BLM prioritize our region's economic reality when making management decisions.

Alternative F still allows for parts of the planning area to be available for new oil and gas leasing. In our view, it's essential that we don't expand the "footprint" of oil and gas production and keep development concentrated in already leased areas. Leasing on low to no potential oil and gas lands hurts Western Colorado's recreation economy by tying up lands that might otherwise be managed for recreational or conservation purposes. Instead, your final plan must ensure that energy development aligns harmoniously with other considerations, including recreation and conservation.

Alternative F also proposes closing an additional 270,700 acres of high oil and gas potential that overlaps with popular recreation areas or Areas of Critical Environmental Concern. While some of these places may have been eyed for oil and gas development, these same lands were identified by members of the public and the science community as special for recreation, vital for supporting sensitive species, or containing important cultural and archaeological resources.

Some examples of special areas that Alternative F proposes closing to oil and gas that should be incorporated into the final plan include:

- The Grand Hogback
- Red Hill
- The Crown
- Thompson Creek
- Lower Dolores River Canyons
- The Book Cliffs
- North Fruita Desert

We are also encouraged to see the BLM considering an expansion to the Castle Peak Wilderness Study Area in Eagle County in Alternative F and expect that will continue to be a part of the final plan. The diverse ecosystems of Castle Peak, ranging from 8,000 to 11,000 ft, provide for a wide variety of recreational opportunities, and the abundant water and diverse terrain also provides outstanding habitat for prized elk and mule deer.

We believe these lands offer greater value for those qualities than their subsurface minerals, and recognize that traditional energy production on our public lands is a major contributor to greenhouse gas emissions, which is already harming our region and state's economy. We are pleased that the BLM is incorporating future costs of carbon dioxide emissions in their planning and that you recognize the extreme negative impacts climate change could have for our businesses and local economy.

The Colorado Fiscal Institute predicts \$13 billion in economic damages from oil and gas industry emissions in this decade, even if Colorado meets its emissions reduction goals. That is \$1.3 billion a year in costs. Considering the state only earned an average of \$41 million a year in oil and gas royalties since 2003, the costs of oil and gas development outweighs the benefits.

Now is the time for the BLM to set a new direction - one that reflects the shift from an extractive regional economy to a recreation and tourism-based one that better aligns with how people value and utilize these lands. Alternative F provides the best path forward for lands under the management of the Colorado River Valley and Grand Junction field offices.

Our businesses are relying on your leadership and recognition that our economy is evolving. We urge the BLM to enact a final management plan that reflects the conservation and recreation management considerations proposed and helps advance our outdoor economy on the Western Slope.

Sincerely,

Michael Shook
Home Waters Real Estate
Carbondale, CO

Monique Vidal
Monique Vidal Interior
Design Inc.
Carbondale, CO

Ann Egan
Brush Creek Petsitting
Eagle, CO

Royal Laybourn
Roaring Fork Building
Specialties LTD.
Basalt, CO

Susie Kincade
Women's Empowerment
Workshop
Eagle, CO

Andrew Nardecchia
Carbondale Family Dental
Carbondale, CO

Amber Frisbie
The Crow & Key
Carbondale, CO

Pam Johnson
Cedar Ridge Ranch
Carbondale, CO

Tyler Stableford
Tyler Stableford
Productions
Carbondale, CO

Candice Hart
Consciously Transforming
Space, LLC
Carbondale, CO

Ben Coates
Revel Bikes
Carbondale, CO

Hannah Berman
Aspen Skiing Company
Aspen and Basalt, CO

Ted Behar
Elkview Realty, LLC
Carbondale, CO

Louie Velasquez
Caribou Club
Aspen, CO

Cate Tallmadge
Main Street Gallery and
The Framer, LLC
Carbondale, CO

Erin Zalinski
RD Landholding LLC
Glenwood Springs, CO

Jonathan Stauffer
Grappa Fine Wines
Vail, CO

Nic DeGross
Aloha Mountain Cyclery
Carbondale CO

Jeff White
Aspen Kettle Corn
Aspen, CO

Jeff Dysart
Alpine Angling &
Adventure Travel, Inc.
Carbondale, CO

Ryan Pratt
Treadz
Glenwood Springs, CO

Ryan Pratt
Goodz
Glenwood Springs, CO

Matt Vickers
Vickers Collection
Aspen, CO

Connie Baker
Marble Distilling
Carbondale, CO

Eric Mitchell
Phat Thai
Carbondale, CO

John Charters
Bristlecone Mountain
Sports
Basalt, CO

Lani Kitching
Proudline Guided Fly
Fishing, LLC
Carbondale, CO

Dirk Bockelman
Aspen Expeditions
Worldwide
Aspen, CO

Penn Newhard
Backbone Media
Carbondale, CO

Jim Hawkins
Four Mile Creek Bed and
Breakfast
Glenwood Springs, CO

Nolson Oldham
Dos Gringos Burritos
Carbondale, CO

Brion After
Independence Run and
Hike
Carbondale, CO

Charlie Chacos
Bonfire Coffee
Carbondale and Glenwood
Springs, CO

Sara Lewis
Redstone Inn
Redstone, CO

Gina Tassinari
Redstone General Store
Redstone, CO

Hilarie Watkins
Crystal Cowgirls
Mercantile
Glenwood Springs, CO

Myria Smallwood
Crystal Tuning
Glenwood Springs, CO

Anne White
True Nature Healing Arts
Carbondale, CO

Steven Horner
Slow Groovin BBQ
Carbondale, CO

Lynne Diekmann
Lynne @ Elements
Carbondale, CO

David Teitler
Carbondale Acupuncture
Center
Carbondale, CO

Christina Barrenger
Flowers on Main ST.
Carbondale, CO

Matt Owings
M. Austin Investments LLC
Carbondale, CO

Joan Langer
Crystal River Spas
Carbondale, CO

Chelsea Krebbe
Aspen Estetica
Carbondale, CO

David Dixon
Strange Imports
Carbondale, CO

Maile Spung
Ute Mountaineer
Aspen, CO

Scott Braden
Lodore Consulting LTD
Grand Junction, CO

Sarah Shrader
Bonsai Design
Grand Junction, CO

Bill Anuszewski
Jaywalker Lodge, Inc.
Carbondale, CO

Robert Noyes
RockyMounts
Grand Junction, CO

Dawn Cooper
Boneshaker Adventures
Grand Junction, CO

Jeff Knable
Casual Culture
Glenwood Springs, CO

Molly Jacober
Avalanche Ranch Cabins
& Hot Springs
Redstone, CO

Sarah Johnson
Wild Rose Education
Carbondale, CO

Ben Kelly
Honu Studio
Carbondale, CO

Blake Hansen
Hansen Construction
Aspen, CO

Evan Cree
Blazing Adventures
Snowmass Village, CO

Lorna Reed
Reedesign LLC
Palisade, CO

Peter Van De Carr
Backdoor Sports Ltd
Steamboat Springs, CO

Ants Cullwick
Koru, Ltd
Carbondale, CO

Brian Raitman
Raitman Art Galleries
Breckenridge and Vail, CO

Ken Murphy
Glenwood Adventure
Company
Glenwood Springs, CO

Patrice Fuller
Carbondale Beer Works
Carbondale, CO

Brad Smith
La Raza Restaurant
Carbondale, CO

John Le Coq
Fishpond
www.fishpondusa.com
Silverthorne, CO

Kevin Timm
Seek Outside
Grand Junction

Nicole Parentice
Self Employed
Grand Junction, CO

TJ Smith
Stray Wild
Grand Junction, CO

Shannon Long
Factory Outdoor
Glenwood Springs, CO

Rondo Buecheler
Palisade River Trips
Palisade, CO

Scott Winans
Palisade Cycle & Shuttle
Palisade, CO

Patric Matysiewski
Sauvage Spectrum Winery
Palisade, CO

Richard Allen
Vintage Ski World
Carbondale, CO

Stacey James
Gran Farnum Printing
Glenwood Springs, CO

Sandra Mackay
Advanced Bodyworks
Therapeutic Massage
Carbondale, CO

Federico Peña
Sopris Liquor & Wine
Carbondale, CO

Anne Grice
Anne Grice Interiors
Aspen, Pitkin, CO, CO

Chris Stevens
Design Project
Glenwood Springs, CO

Jarrod Hollinger
Aspen Outfitting Company
Aspen, CO

Christopher Gemmell
Charlies Shirts Inc
Vail, CO

Chris Swallows
Brown Dog LLC
Carbondale, CO