September 6, 2016

Bureau of Land Management
White River Field Office
Attn: May 2017 Lease Sale
Meeker, CO 81461
(sent VIA EMAIL only to blm_co_may_2017_lease_sale@blm.gov)

Re: Public Scoping Comments for May 2017 Lease Sale

Dear Bureau of Land Management:

Grand County respectfully submits the following public scoping comments on the proposed May 2017 Lease Sale to the Bureau of Land Management ("BLM") as noticed in the Sky Hi News, on August 8, 2016, in advance of the Environmental Assessment beginning for this proposal.

**Introduction**

Grand County has great concerns in regards to the upcoming leases of 20 parcels totaling 27,529 acres of public and private land in Grand County for oil and gas development. The local ecosystem is very fragile and much care is taken to protect it in order to preserve the County’s natural beauty. The County feels that oil and gas development would have negative consequences on our local environment and economy.

**Water Resources and Water Quality**

Two of the most serious issues in Grand County are water resources and water quality. Grand County is a unique and sensitive area due to being the headwaters for the Colorado River. Several tributaries to the Colorado River run through the proposed lease parcels, including Trail Creek, Willow Creek, Drowsy Water Creek, McQueary Creek, Sheriff Creek, Ute Bill Creek, First Creek, Second Creek and several un-named water courses. Water quality in all of these Creeks and water:
courses is of concern, as they provides irrigation water to several area ranches, and they are critical to the ranching and outdoor recreation economy in Grand County.

Grand County has a growing concern regarding availability of water to support the current population and tourism sector. Adding large industry, such as Oil and Gas, would put even further strain on this valuable resource. Water resources such as the Colorado River and many local lakes are also major tourist and recreation attractions. The heavy water needs adherent to Oil and Gas development would put a strain on these water bodies, thus endangering the features of these attractions.

Resource Management Plan
The majority of federal mineral estate in the Planning Area is characterized as low or no potential for oil and gas development. In addition, leasing activity in the Planning Area has always been relatively low and sporadic, especially in Grand County. The Environmental Assessment to be undertaken should provide clear evidence to support the rationale for offering up such a significant amount of land area for Oil and Gas that is located in an area designated as having a low potential

BLM should consider the importance of protection of plants, wildlife and wilderness characteristics. With respect to wildlife, such as mule deer, moose and elk, strong consideration should be given to the current condition of habitat and the impacts of oil and gas drilling on the habitat. Other wildlife concerns include critical winter habitat and potential habitat for threatened or endangered plant or animal species. Previous protest letters from Grand County have outlined concerns regarding raptor nesting and fledgling habitat, sage grouse nesting, and wetland vegetation areas, in addition to potential habitat for threatened or endangered plant or animal species.

Preserving wetlands is important to allow for a healthy ecosystem by improving water quality through filtering, maintaining stream flow during dry periods, and replenishing groundwater. According the United States Environmental Protection Agency:

More than one-third of the United States’ threatened and endangered species live only in wetlands, and nearly half use wetlands at some point in their lives. Many other animals and plant depend on wetlands for survival. Migratory waterfowl use wetlands as resting, feeding, breeding, or nesting grounds for at least part of the year. Parcels that include wetlands that should be further studied to understand the impact that Oil and Gas exploration will have.
The BLM should also take into consideration the growing impact present to public lands caused by increased recreation demand and rapidly expanding urban interface areas in Grand County, particularly for those parcels in and around Granby and Hot Sulphur Springs. Furthermore, the designated areas are located in places within Grand County that are vital to our summer, fall and winter recreation and tourist based economy and the commercial facilities and activities supporting such uses, resort ranches, outfitters, hunting and fishing, hiking and trail running, OHV and mountain biking. The adopted RMP is required to recognize local master plans and policies. Oil and gas development in the magnitude as is being contemplated does not comply with the Grand County Master Plan.

Conservation Easements
Many of the parcels being considered for Oil and Gas leases are on private properties, and are in areas that we believe to be under conservation easements or near conservation easements. Conservation Easements are granted due to there “significant relatively natural habitat for native wildlife and ecological, scenic, and open space values,” as recognized in Colorado Revised Statute §§ 38-30.5-101 et seq. Many times the property conserved by the conservation easements is declared to be “Open space and natural land, and may not be coveted or directed to any uses other than those provided in the easement.” Mineral activities is addressed as follows: “Exploration or extraction of oil, gas, and other mineral in, on, or under the Property is prohibited by open-pit or surface mining methods. No sub-surface or other exploration or extraction of oil, gas, rock, gravel, sand or other minerals, including the lease, sale or other disposition of the rights to such material may impair or result in the destruction of the Conservation values.” It will be imperative that the BLM’s EA include a detailed assessment of conservation easements located within the areas that have been identified for Oil and Gas leases and the impacts to which this type of use may impact existing easements.

Conclusion
For the reasons stated above, the nominated parcels in Grand County are inappropriate for mineral leasing and development. There is too much at stake in Grand County to permit this kind of high impact activity, especially without current information and evaluation of relevant issues, especially water quality.

Due to the unique water quantity and quality issues facing Grand County we request no leasing be done in parcels that affect any of the tributaries to the
Colorado River. Since the Colorado River has it’s headwaters in Grand County any impacts to this river could impact millions of downstream users.

Grand County respectfully requests that the Field Manager withdraw the nominated parcels from the May 2017, competitive lease sale. In the event that the BLM proceeds to offer these parcels, all prospective bidders should be informed of the pending protest.

Sincerely,

E. Jane Tollett, Chair
Grand County Board of County Commissioners

Kristen Manguso
Grand County Board of County Commissioner

Merrit Linke
Grand County Board of County Commissioners

cc:
Board of Trustees, Town of Kremmling
Board of Trustees, Town of Granby
Board of Trustees, Town of Grand Lake
Board of Trustees, Town of Hot Sulphur Springs