



January 8, 2016

Karl Mendonca
Bureau of Land Management
Colorado River Valley Field Office
2300 River Frontage Road
Silt, CO 81652
Email: WRNFleases@blm.gov

Re: Comments on Draft Environmental Impact Statement on 65 previously-issued leases on White River National Forest

Dear Mr. Mendonca,

Please accept these comments on behalf of the Western Slope Conservation Center regarding the Bureau of Land Management's (BLM) draft Environmental Impact Statement (DEIS) on the 65 leases issued without appropriate NEPA analysis since 1993 on the White River National Forest (WRNF).

We appreciate and support BLM's willingness to carefully analyze these 65 leases. We encourage the BLM to adopt Alternative 4 (Proposed Action) which would cancel all or part of 25 existing leases in areas identified by the WRNF Draft Record of Decision on future oil and gas leasing (USFS 2014b) and modify existing lease stipulations in areas identified as open to future oil and gas development.

As BLM staff stated at the public comment meeting in Carbondale, CO on December 16th, BLM does possess the legal authority to cancel leases that were issued without proper NEPA analysis. As also stated at that meeting, the BLM has the authority to produce a final decision that combines elements from multiple alternatives. For these reasons, we encourage the BLM to consider cancelling additional non-producing leases as appropriate to protect wildlife, watershed, air quality, and local economies dependent on clean air, clean water, and healthy public lands. Zones 2 & 3 are of greatest concern for communities in the North Fork of the Gunnison Watershed, as oil and gas development in these zones would pose the greatest risk to our communities' health and quality of life.

For all leases that are not cancelled, we encourage BLM to consider placing additional stipulations, as appropriate, to mitigate environmental impacts to water quality, air quality, soils, riparian vegetation, sensitive plant species, and sensitive wildlife species. Careful

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consideration should also be given to important wildlife habitat, with stipulations that minimize the impact to rare upland habitat that provides important connectivity for the entire region.

The Western Slope Conservation Center is a nonprofit organization based in Delta County and serves the North Fork and Lower Gunnison Watershed. Our mission is to build an active and aware community to protect and enhance the lands, air, water and wildlife of the Lower Gunnison Watershed. We support collaborative land management decision-making which incorporates public input at each stage of the management process and engages all relevant local, state, and federal agencies in landscape-level planning. These types of processes will produce the best outcome for local communities, public health, and the plants and wildlife that depend on our public lands.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Johnson', is positioned above the printed name.

Alex Johnson
Executive Director

Western Slope Conservation Center

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