

WESTERN SLOPE
CONSERVATION
CENTER



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Subject: Update to the North Fork Alternative Plan, in the Uncompahgre Field Office Resource Management Plan Amendment Process

Dear Angela Losasso,

Thank you for the opportunity to comment on the Resource Management Plan Amendment process for the Uncompahgre Field Office. The Western Slope Conservation Center (WSSC), representing over 600 community members across Colorado, has been integrally involved in the planning process over the last fourteen years.

WSSC, along with several other local organizations and community members, submitted the North Fork Alternative Plan to the Bureau of Land Management in 2013. The North Fork Alternative Plan was designed to be a balanced, community-driven proposal for the management of oil and gas development on public lands in the North Fork Valley. Over the past eleven years, new scientific information about wildlife migrations and corridors, climate change, and protections for water and community resources has been published. Given this updated information, our community and organization assert that no new oil and gas leasing or development should occur on public lands in the North Fork Valley.

Western Colorado Alliance (formerly Western Colorado Congress) has been supportive of the North Fork Alternative throughout the planning process and has actively worked to address conservation and community issues within the UFO Resource Management Plan for decades. The Alliance represents 2,000 members and supporters across the Western Slope who work together to build healthy, just, and self-reliant communities. Common-sense and community informed land management planning is critical to the future of our Western Slope communities.

We support the North Fork Alternative as a community driven and scientifically informed vision for land management within the UFO RMP.

We do not think there is any compelling public need that warrants oil and gas development anywhere in the North Fork Valley. We assert that lands, ecosystem services, habitats, wildlife, and watershed resources that are protected are a far greater public need. However, should the BLM decide to move forward with any new leasing in the North Fork Valley, a worst-case scenario in our view, the agency should follow the recommendations listed below to reflect updated on-the-ground conditions. The revisions to the North Fork Alternative Plan are reflected below. Updates to the North Fork Alternative Plan are grounded in the principles of ecological integrity, biodiversity preservation, climate resiliency, human health, and community engagement. This revised alternative seeks to refine and fortify our approach to safeguarding the North Fork Valley region of western Colorado for generations to come.

Sincerely,



Hannah Stevens
Executive Director
Western Slope Conservation Center



Emily Hornback
Executive Director
Western Colorado Alliance

Background on the North Fork Alternative Plan

The North Fork Alternative Plan (NFAP) was developed in 2013 with the input of a set of stakeholders representing agricultural, tourism, realty, businesses, and conservation organizations in the North Fork Valley of western Colorado. It came about through a process that identified key resources, land uses, and values of the North Fork that could be impacted by oil and gas development, and applied protection to those through management stipulations that would close certain areas of public lands and minerals to oil and gas leasing, and would impose development setbacks with strict surface restrictions in places where leasing might be allowed to occur. In 2016, this plan was included in the draft Resource

Management Plan as Alternative B.1. This was one of the first times a community vision was incorporated into a Resource Management Plan.

The NFAP formed one piece of the Resource Management Plan revision covering the entire BLM Uncompahgre Field Office. The plan proposes a set of recommendations under six specific management zones to protect the North Fork Valley's unique resources and values, including:

1. Economies of agriculture and coal mining
2. Water supplies
3. Schools, parks, and other community areas
4. Rivers and riparian areas
5. Important wildlife habitat
6. Sensitive soils and geology

The NFAP also proposes two special management designations aimed at protecting the scenic quality of the North Fork Valley as well as ensuring the continuation of the popular recreational use of the Jumbo Mountain area near Paonia.

The BLM administers over two million acres of federal minerals and nearly one million acres of public lands in the Uncompahgre Field Office. The NFAP area comprises about 7% of these lands and less than one percent (0.7 %) of the BLM lands in the state. The North Fork Valley's BLM lands are closely connected and interspersed with the community's human environment, towns, farms, water supplies, residences, and businesses. Although it affects only a fraction of the public lands and minerals managed by the BLM in the area, the NFAP focuses on an area with a concentration of resources, heavy public utilization already, and high public value. It is within the BLM's authority to implement the NFAP, which comprises a reasonable, prudent, and narrowly crafted component of the final management plan for the public lands in the North Fork Valley.

Updates to the North Fork Alternative Plan

The North Fork Alternative Plan must evolve to address the dynamic challenges and opportunities that arise over time. As we navigate an ever-changing landscape shaped by a changing climate, ecological shifts, economic fluctuations, and societal developments, it becomes imperative to include additional management guidance and prescriptions in any update to the plan.

As such, the NFAP has been updated to support no new leasing in the North Fork Valley. If the BLM were to move forward with additional leasing in the area, the

NFAP includes a range of specific oil and gas stipulations to prioritize protection of the resources, values, and uses of the public lands and lands associated with BLM fluid minerals in the North Fork Valley. These stipulations are based on known best management practices, existing or recommended stipulations, state regulations, and rulemakings, among other sources. The proposed new oil and gas stipulations range from NO LEASING to LEASING with surface use restrictions, described basically as follows:

- NO LEASING: Lands/minerals are not available for oil and gas leasing.
- LEASING-NSO: Leasing with mandatory (non-modifiable, non-waivable, and non-exemptible) No Surface Occupancy stipulations (NSO); the minerals are available but the lessee has no right to occupy the surface. This means that no temporary or permanent facility can be located on the public lands wherever the stipulation is in effect; and, for non-federal, split-estate land with BLM minerals, the lease carries no right for the lessee to access or disturb the surface.
- LEASING-CSU/TL: Leasing with Controlled Surface Use (CSU)/Timing Limitations (TL), the minerals are available with restrictions that require additional measures and/or seasonal restrictions.

Below we list the specific management zones and special management designations. For each of these items, we'll indicate the original North Fork Alternative Plan recommendations, followed by our suggested updates to this plan.

The proposed updates to the NFAP are in line with current federal priorities to shift decision-making to ensure public lands are part of the solution to the climate crisis.¹ This direction is consistent with BLM's obligation under the Federal Land Policy and Management Act of 1976 (FLPMA) to manage public land to protect our environment and the public, to manage lands for multiple use and sustained yield, and to prevent unnecessary and undue degradation.²

¹ Executive Order 14008 "Tackling the Climate Crisis at Home and Abroad" outlines specific commitments to "put the United States on a path to achieve net-zero emissions, economy-wide, by no later than 2050." Section 201, EO 14008 (Jan. 27, 2021).

² 43 U.S.C. §§1701(a)(8), 1702(c), 1732(b).

Mining & Agriculture Management Zone would protect coal mining and agriculture from the risks associated with oil and gas development.		
2013 North Fork Alternative Plan component	2024 suggested change	Justification for suggested change
NO LEASING within ¼-mile of active or existing coal leases, except to facilitate capture and commercial use of coal mine methane.	The BLM should quantify the scope of methane pollution happening on the North Fork Valley's public lands and work with interested and/or responsible parties to actively facilitate the capture of this greenhouse gas.	Coal mine methane emissions from active and abandoned mines within the Uncompahgre Field Office are known locally to occur. Methane is a potent greenhouse gas. The BLM should take steps with interested local governments, nonprofits, and private companies to address this issue. A North Fork Methane Working Group was formed in 2017 to address this issue in the area but was met with regulatory hurdles.
LEASING-NSO within ¼-mile of any Prime and Unique farmlands, livestock operation, any organic or conventional farm, ranch, or orchard, and the West Elks American Viticultural Area.	NO LEASING within a ½-mile of any Prime and Unique farmlands, livestock operation, any organic or conventional farm, ranch, or orchard, and the West Elks American Viticultural Area.	A study completed in 2015 outlines the potential impacts on agriculture and food production from oil and gas development, which includes soil and water contamination and impacts on livestock ³ . Impacts to water sources, which are described below, will also have an impact on farms, ranches, vineyards, and orchards as water from irrigation ditches in the North Fork Valley is used to irrigate these areas ⁴ . Protections must be in place to protect these important community resources.

³"Oil, Food, and Water: Challenges and Opportunities for California Agriculture – Pacific Institute." *Pacific Institute*, 9 December 2015, <https://pacinst.org/publication/oil-food-and-water-challenges-and-opportunities-for-california-agriculture/>.

⁴"FRACKING AND THE FOOD SYSTEM." *Food & Water Watch*, 01 May 2016, https://foodandwaterwatch.org/wp-content/uploads/2021/03/ib_1605_frackingandthefoodsystem-web.pdf.

North Fork Valley Towns, Schools & Community Management Zone would keep development away from busy community areas to better protect public health and safety as well as quality of life.

2013 North Fork Alternative Plan component	2024 suggested change	Justification for suggested change
NO LEASING within ½-mile of the Crawford, Hotchkiss, and Paonia town limits	NO LEASING within ½-mile of the Urban Growth Area boundaries for the towns of Crawford, Hotchkiss, Somerset, and Paonia	Changing the boundaries from town limits to the planned growth area of the four towns in the North Fork Valley adapts to the changing conditions on the ground and planned future of the local communities.
<p>LEASING-NSO within ¼-mile around community facilities:</p> <ul style="list-style-type: none"> ● North Fork Swimming Pool (33 Miners Way, Hotchkiss, CO 81419) ● Crawford School (51 Fir Ave., Crawford, CO 81415) ● Hotchkiss High School (438 Miners Way, Hotchkiss, CO 81419) 	<p>NO LEASING within ½-mile around community facilities, including but not limited to:</p> <ul style="list-style-type: none"> ● North Fork Swimming Pool (333 Miner's Way, Hotchkiss, CO 81419) ● Crawford School (51 Fir Ave., Crawford, CO 81415) ● North Fork High School (438 Miners Way, Hotchkiss, CO 81419) ● The North Fork Trash Transfer Station (36577 K50 Rd., Hotchkiss, Colorado) ● Paonia K-8 Elementary School (846 Grand Ave, Paonia, CO 81428) 	<p>A study, published at the end of 2012, shows that residents living $\leq \frac{1}{2}$ mile from wells are at greater risk for health effects from oil and gas development than are residents living $> \frac{1}{2}$ mile from wells⁵. The ECMC's oil and gas rules also dictate that oil and gas wells should not be drilled within 2000 ft of schools or childcare centers to protect human health^{6,7}. The state of California mandates that oil and gas facilities be over 3,200 feet (1km) of "sensitive" areas such as schools, parks, and homes⁸. Protecting our community facilities is imperative to protecting the next generation from the impacts of oil and gas development.</p>

⁵ "Human health risk assessment of air emissions from development of unconventional natural gas resources." *Science Direct*, 1st. May 2012, <https://www.sciencedirect.com/science/article/abs/pii/S0048969712001933?via%3Dihub>.

⁶ "Kohler, Judith. "Colorado hearing focuses on how far oil, gas wells should be from homes, schools." *The Denver Post*, 5 September 2020, <https://www.denverpost.com/2020/09/05/colorado-fracking-oil-gas-well-schools-homes/>.

⁷ "Department of Labor and Employment. Series 100 Rules" *Colorado Oil and Gas Conservation Commission*, State of Colorado, 1st January 2021, [https://ecmc.state.co.us/documents/reg/Rules/LATEST/Complete%20Rules%20\(100%20-%201200%20Series\).pdf](https://ecmc.state.co.us/documents/reg/Rules/LATEST/Complete%20Rules%20(100%20-%201200%20Series).pdf).

⁸ "Knight, Chris. "California approves setbacks for oil, gas wells." *Argus Media*, 1 September 2022, <https://www.argusmedia.com/en/news/2366837-california-approves-setbacks-for-oil-gas-wells>.

<ul style="list-style-type: none"> The North Fork Trash Transfer Station (36577 K50 Rd., Hotchkiss, Colorado) 		
Clean & Dependable Water Supply Management Zone would protect the water sources and supplies for area towns, farms, residents, and community and private water systems.		
2013 North Fork Alternative Plan component	2024 suggested change	Justification for suggested change
NO LEASING within ¼-mile of municipal or private water systems.	NO LEASING within ½-mile of any private well, reservoir, municipal or private water system, including source water springs.	Language clarified. The town of Paonia is planning a hydrologic survey of the water source spring area, which will enhance technical knowledge about this spring area that does have some BLM parcels nearby.
LEASING-NSO within ½-mile of any private well, municipal, or private water system, including irrigation ditches.	LEASING-NSO within ½-mile of any private well, municipal, reservoirs, or private water system, including source water springs	Adding the inclusion of reservoirs in this management area, as reservoirs are critical components of the local water systems. There is precedent for including setbacks from reservoirs, as can be seen here at Aurora Reservoir ⁹ . Removed ditch language to clarify with 2024 change.
LEASING-NSO within	NO LEASING within 1/2-mile of any dam, ditch,	Changed to conform with the 2024 change.

⁹Sullivan, Cole. "Neighborhood group fights proposed oil wells near Aurora Reservoir." *9News*, 16 August 2023, <https://www.9news.com/article/tech/science/environment/neighbors-fight-proposed-oil-wells-aurora-reservoir/73-82f697ae-f4c8-4874-bd44-2180a051f070>.

<p>¼-mile of any dam, ditch, irrigation intake, canal, or other water conveyance.</p>	<p>irrigation intake, canal, or other water conveyance.</p> <p>LEASING-NSO within ½-mile of any dam, ditch, irrigation intake, canal, or other water conveyance.</p>	
<p>River Areas & Riparian Corridors Management Zone would protect the land immediately adjacent to rivers and riparian areas, which are critical to wildlife, protecting water quality, and recreation.</p>		
<p>2013 North Fork Alternative Plan component</p>	<p>2024 suggested change</p>	<p>Justification for suggested change</p>
<p>NO LEASING within ½-mile of rivers and water bodies.</p>	<p>NO LEASING within ½-mile of the 100-year floodplain of rivers, streams, wetlands, water courses, waterways, and water bodies.</p>	<p>As climate change increases the frequency and intensity of extreme weather events¹⁰, BLM must plan to manage for these extreme events and their impacts on the landscape. According to the Boulder Reporting Lab, “Climate change is expected to bring more infrequent but more ferocious precipitation, potentially changing 100-year floods to 50-year or even 10-year events”¹¹. A setback from the 100-year floodplain is imperative as the BLM manages for a changing climate.</p>
<p>LEASING-NSO within 1 mile of the North Fork and Smith Fork of the Gunnison Rivers.</p>	<p>NO LEASING within 1 mile of the 100-year floodplain of the North Fork and Smith Fork of the Gunnison Rivers, as well as Leroux, Jay, Roatcap, Terror, Hubbard, East and West Muddy Creeks, and Love Gulch.</p>	<p>Adjusting from an NSO stipulation to a No Leasing stipulation is also imperative for the BLM. Studies completed after 2013 show an increased impact on groundwater from hydraulic fracturing, particularly from fluids related to unconventional oil and gas</p>

¹⁰ “Extreme Weather | Facts – Climate Change: Vital Signs of the Planet.” *NASA Climate Change*, 16th December 2016, <https://climate.nasa.gov/extreme-weather/>.

¹¹ “Drugan, Tim. “Boulder’s flood risk: A decade post-2013 deluge and still vulnerable.” *The Boulder Reporting Lab*, 11 September 2023, <https://boulderreportinglab.org/2023/09/11/boulders-flood-risk-a-decade-after-2013s-deadly-deluge-are-we-ready-for-the-next/>.

		operations infiltrating groundwater resources through contaminant releases, failures of wells, and upward fluid migrations along preferential paths ¹² . This Columbia University study completed in Pennsylvania in 2016 shows that a 1-kilometer setback may not be enough to protect groundwater resources from contamination. ¹³ The addition of Leroux, Jay, Roatcap, Love Gulch, Terror, Hubbard, East and West Muddy Creeks coincides with above referenced studies and elevated protections for critical agricultural and domestic water sources located within these drainages which are major tributaries to the North Fork of the Gunnison River. WSCC’s support of setbacks on these areas should be construed as protecting traditional agricultural land uses and not necessarily opposing others.
Wildlife Management Zone would protect important wildlife habitats in the area.		
2013 North Fork Alternative Plan component	2024 suggested change	Justification for suggested change
LEASING-NSO for critical habitat including important range for elk and mule deer, migration routes, and raptor nest	Setbacks included in this management zone should be adjusted to conform with the ECOM’s 1200 series rules concerning high-priority habitat for several wildlife species, including but not limited to elk, mule deer, raptors, threatened	Aligning with the most recent regulations from the BLM and other managing agencies is good practice, will reduce regulatory and compliance issues, and has happened over the last ten years that the original North Fork Alternative did not

¹² “C. Rivard, D. Lavoie, G. Bordeleau, F. Huchet, R. Lefebvre, M.J. Duchesne, N. Pinet, S. Séjourné, H. Crow, G. Bellefleur, V. Brake, S. Hinds, Evaluating potential impacts of industrial activities at depth on shallow groundwater: Holistic integration of results from multidisciplinary research in eastern Canada, Groundwater for Sustainable Development, 10.1016/j.gsd.2024.101088, 25, (101088), (2024).

¹³ “Yan B, Stute M, Panettieri RA Jr, Ross J, Mailloux B, Neidell MJ, Soares L, Howarth M, Liu X, Saberi P, Chillrud SN. Association of groundwater constituents with topography and distance to unconventional gas wells in NE Pennsylvania. Sci Total Environ. 2017 Jan 15;577:195-201. doi: 10.1016/j.scitotenv.2016.10.160. Epub 2016 Nov 4. PMID: 27817928; PMCID: PMC5116425.

sites.	and endangered species; or the Big Game RMP Amendment process concurring with the Uncompahgre RMP Amendment revision, whichever is more protective.	take into account. The Colorado Energy and Carbon Management Commission’s Oil and Gas Rules (particularly the 1200 series rules), ¹⁴ the BLM’s Big Game Corridor Amendment, ¹⁵ the Sage Grouse RMP Amendment ¹⁶ , and other relevant setbacks prescribed by Colorado Parks and Wildlife on a project-specific basis should all be considered.
LEASING-NSO within ½-mile of streams or river segments that provide habitat for native trout.		
LEASING-TL for other habitats during critical seasons per Colorado Parks & Wildlife		
Landscape Management Zone would protect water quality from downstream impacts associated with selenium loading from Mancos soils, and would protect against selenium loading from geologic hazards and surface disturbances..		
2013 North Fork Alternative Plan component	2024 suggested change	Justification for suggested change
NO LEASING within lands identified as high and very-high potential for selenium loading.	No change	No change
LEASING-NSO for lands with Mancos Shale soils within an additional ¼-mile of lands with high and very-high potential for selenium loading.	No change	No change

¹⁴ “ECMC Regulation.” *ECMC Regulation*, State of Colorado, 15th January 2021, <https://ecmc.state.co.us/reg.html#/rules>.

¹⁵“EplanningUi.” Big Game Corridor Amendment Bureau of Land Management, 1st February 2024, <https://eplanning.blm.gov/eplanning-ui/project/2018400/510>.

¹⁶EplanningUi.” Gunnison Sage-Grouse Resource Management Plan Amendment. *EplanningUi*, 8 February 2024, <https://eplanning.blm.gov/eplanning-ui/project/2019031/510>.

LEASING-NSO for all areas with medium to high geologic hazard.	No change	No change
LEASING-CSU/TL for areas with low to medium geologic hazard.	No change	No change
Special Management and Resources Designations - Jumbo Mountain Special Recreation Management Area would protect outstanding recreational opportunities in the area, Jumbo Mountain would be designated as a Special Recreation Management Area (SRMA) with surface oil and gas development prohibited.		
2013 North Fork Alternative Plan component	2024 suggested change	Justification for suggested change
LEASING-NSO within the Jumbo Mountain SRMA.	NO LEASING within the Jumbo Mountain SRMA	An area managed for recreation, specifically one as important as Jumbo Mountain to the communities of the North Fork Valley, should not be open to oil and gas leasing.
Visual Resource Management would protect top quality, nearby scenic resources subject to high public sensitivity, recommended Visual Resource Management for the North Fork would apply a VRM Class II designation to the following lands:		
2013 North Fork Alternative Plan component	2024 suggested change	Justification for suggested change
NO LEASING of select prominent landscape features.	No change	No change
LEASING-NSO within 1 mile of travel and scenic	Expand the travel corridors to include Steven’s Gulch, Leroux Creek (3100 rd), Smith Fork Road,	In the last ten years, increases in outdoor recreation in the North Fork Valley have occurred, ¹⁷

¹⁷ “Skinner, Doug. “Statewide Comprehensive Outdoor Recreation Plan (SCORP).” *Colorado Outdoors Online*, 2 January 2019, <https://coloradooutdoorsmag.com/2019/01/02/2019-scorp/>.

corridors.	and Lone Cabin Road	especially following the COVID-19 pandemic ¹⁸ . Areas like Steven’s Gulch Road, Leroux Creek (3100 rd), Smith Fork Road, and Lone Cabin Road are seeing increasing visitation, and the visual resources surrounding these roads should be protected.
LEASING-CSU with other VRM-specific Conditions of Approval for all other lands associated with BLM minerals visible from important vistas and travel corridors.	No change	No change

¹⁸ “Huspeni, Dennis, and Seth Boster. “Outdoor recreation in Colorado, U.S. shines during pandemic.” *Denver Gazette*, 9 November 2021, https://denvergazette.com/news/business/outdoor-recreation-in-colorado-u-s-shines-during-pandemic/article_a5e4e3f4-41b8-11ec-bba3-6ff816a26069.html.

Additional Priorities and Prescriptions to be included in the updated North Fork Alternative Plan

In addition to adopting into its new preferred alternative the specific recommendations on updating the NFAP presented above, we request that the BLM consider the following in this land use planning and future implementation projects.

- 1) BLM should include additional mitigation and adaptation measures, in line with the best available science, to respond to evolving climate impacts in the area.
- 2) BLM should include a robust analysis outlining how various development scenarios impact greenhouse gas emissions and reduction goals.
- 3) BLM should prioritize land conservation and restoration of natural functions on all agency lands, recognizing that conservation is part of BLM's mission and multiple use and sustained yield mandate under FLPMA.
- 4) BLM should facilitate the mitigation of coal-mine methane waste as a key agency, field office, and project-level priority.

The BLM should consider the best available science for mitigation and adaptation.

Additional mitigation and adaptation measures are necessary to address the challenges of climate change. Climate change impacts, such as altered precipitation patterns, increased frequency of extreme weather events, and shifts in vegetation zones, can have profound effects on the ecosystems across the region.

As documented in numerous studies including two National Climate Assessments since 2014, the impacts from climate change - even with bold efforts to eliminate emissions today sufficient to keep the world within an aspirational 1.5-degree threshold - will affect all aspects of life, economic, and ecological systems on earth, including those under the purview of the U.S. federal government administered by the BLM Uncompahgre Field Office

Indeed, all the resources and uses that depend upon or that are directly administered by the BLM impact and are being impacted by climate change. This includes, and is not limited to, Colorado's web of wildlife and water supplies, recreation, land and range health, and energy development. Such climate impacts are highly relevant to the North Fork Valley, the Uncompahgre Resource Area, the Gunnison River region, and western Colorado more generally. Accordingly, climate change must be a core consideration for public land management across all uses and resources.

In February 2023, the Colorado Farm and Food Alliance (COFFA) released its report “*Gunnison Basin - Ground Zero in the Climate Emergency*” which documents indicators of global heating now manifesting in the North Fork Valley, Delta County, and throughout the Uncompahgre Field Office.¹⁹

Local impacts are already felt in the region and are forecasted to grow worse, including an increasing risk to public health, loss of income from diminished agricultural and outdoor activities, damage to infrastructure, and persistent drought - as well as an irretrievable loss of and damage to natural and public land resources, and to the values those resources provide to local businesses, communities and citizens.

The BLM should implement management prescriptions in the Uncompahgre Field Office that enhance the ability of natural systems to withstand and recover from climate change impacts, ultimately ensuring the long-term health and functionality of the landscape.

The COFFA report, and the data and studies that it compiles, represents significant new information since the 2013 North Fork Alternative Plan was first presented to the agency, and which the agency is duty bound to properly consider.

This report found, and current science confirms, that two of the biggest steps that the BLM can take to demonstrate credible commitment to and make meaningful gains toward climate action are: 1) to limit fossil fuel development on the public estate, and 2) to increase land conservation and the restoration of natural systems and functions across agency-administered public lands.

The BLM should include a robust analysis outlining how various development scenarios impact greenhouse gas emissions and reduction goals.

Within the plan revision, the BLM should articulate the roadmap to end fossil fuel development on these public lands, including an analysis of how various development scenarios work toward or counter to those ends, such as in relation to the Colorado Greenhouse Gas Reduction Roadmap 2.0, and other local, state, federal climate plans, guidance, and commitments.

The BLM should consider designating additional special management areas to uplift conservation in the planning area and close Areas of Critical Environmental Concern to oil and gas development.

¹⁹ “Traylor, Lauren Traylor, and Pete Kolbenschlager. “Ground Zero in the Climate Emergency.” *Colorado Farm and Food Alliance*, no. 1, 2023, p. 46.

New and updated agency rules, regulations, and changes provide compelling reasons to manage additional lands for conservation. As emphasized in the BLM's Proposed Conservation and Landscape Health Rule²⁰ conservation should be placed on equal footing with other consumptive multiple uses. The BLM should manage for resilient public lands through protection of intact, native habitats, restoration of degraded habitats, and informed decision-making.²¹

The ongoing plan revision provides an opportunity for the BLM to implement management prescriptions that recognize the importance of conservation and resilient ecosystems. As such, the BLM should consider the designation of additional special management areas. Doing so is consistent with a well-established and growing body of science documenting the need to protect and connect intact landscapes. Protected areas - such as Areas of Critical Environmental Concern (ACECs) - are necessary to sustain biological diversity and natural ecological processes.²² Because of their relevant and important values, ACECs within the planning area should be closed to oil and gas development.

In *Western Slope Conservation Center v. BLM*, the BLM committed to amend the RMP and consider anew the eligibility of lands open to oil and gas leasing, the designation and management of ACECs, and management of Lands with Wilderness characteristics. The 2022 settlement agreement does not set limits on the BLM's consideration of conservation management across the field office planning area, but a starting point. Incorporated into these comments below are nominations for the Adobe Badlands, Elephant Hill, and Roubideau Canyons Areas of Critical Environmental Concern. The RMPA is a unique opportunity for BLM to reconsider designating these important areas for protection.

The BLM should implement management prescriptions to mitigate methane pollution.

The BLM should use the ongoing plan revision to make progress towards methane mitigation. Methane mitigation is the remediation of former fossil-energy sites such as abandoned gas and oil wells and shuttered coal mines leaking waste methane, of which there are many in the North Fork Valley.

²⁰ 88 Fed. Reg. 19583 (Apr. 3, 2023).

²¹ Id. at 19585.

²² See, e.g., Gray, C.L., Hill, S. L.L., Newbold, T., Hudson, L. N., Bo, L., Hoskins, A. J., Ferrier, S., Purvis, A. 2016. Terrestrial Protected Areas Worldwide. *Nat. Commun.* <https://doi.org/10.1038/ncomms12306>; Naughton-Treves, L., Holland, M. B., Brandon, K. 2005. The role of protected areas in conserving biodiversity and sustaining local livelihoods. *Annu. Rev. Environ. Resour.* 30,219–252. <https://doi.org/10.1146/annurev.energy.30.050504.164507>.

<p>Medium, Low, and No Potential Management Zone would follow along with the proposed 2023 Oil and Gas Rule, which would focus oil and gas development in areas with high development potential with additional management prescriptions to protect those areas.</p>	
New 2024 addition	Justification for addition
NO LEASING in areas of no, low, or medium oil and gas development potential	This addition complements the 2023 Proposed Oil and Gas Reform Rule ²³ and the Department of Interior report from November 2021. ²⁴ This addition would limit speculative leasing where there is little or no potential for oil and gas development and reduce oil and gas leasing conflicts with important wildlife habitats, outdoor recreation, and cultural resources.
Additional guardrails, including denial criteria, for new leasing that may occur in areas of high development potential	BLM should adopt climate and conservation guardrails, or denial criteria, to guide the application of the preference criteria by BLM staff. In applying the preference criteria, the decision-making process should not inevitably lead to further leasing (and thus development). This is why guardrails—not just “preference criteria”—are essential: to determine, as a threshold matter, whether any leasing is inappropriate given science-based Greenhouse Gas limits and the ecological, biological, and other conservation, human health, and community-centered resources and values that are present in a given area.
<p>Designated ACEC Management Zone would prioritize the protection of the critical species, habitats, and ecological conditions that ACECs are designated to protect over oil and gas development.</p>	
New 2024 addition	Justification addition

²³ “Interior Department Takes Steps to Modernize Oil and Gas Leasing on Public Lands, Ensure Fair Return to Taxpayers | U.S. Department of the Interior.” *DOI.gov*, 20 July 2023.

²⁴ “Interior Department Report Finds Significant Shortcomings in Oil and Gas Leasing Programs | U.S. Department of the Interior.” *DOI.gov*, 26 November 2021.

NO LEASING in designated Areas of Critical Environmental Concern	Areas of Critical Environmental Concern (ACEC) designations already highlight areas where special management attention is needed to protect important historical, cultural, and scenic values, or fish and wildlife or other natural resources ²⁵ . Oil and gas leasing should not be allowed in these areas.
Climate Analysis Management Zone would ensure that any new oil and gas development project in the North Fork Valley would be analyzed to include all cumulative impacts.	
New 2024 addition	Justification addition
Complete a climate analysis for every new oil and gas development project proposed in the North Fork Valley	The agency should be required to show how a new oil and gas project will not have cumulative effects on the climate and contribute to climate change.

²⁵ "ACEC." *Bureau of Land Management*, 01 January 2022, <https://www.blm.gov/programs/planning-and-nepa/planning-101/special-planning-designations/acec>.

Conclusion

We are excited to submit these additions and revisions to the North Fork Alternative Plan due to the evolving dynamics of the region and the urgent need for sustainable land management practices. As the BLM proceeds with the amendment of the Uncompahgre Resource Management Plan, it is paramount that these updates be given due consideration. The North Fork Alternative Plan reflects a more nuanced understanding of the delicate balance between conservation and development and integrates valuable community input. By incorporating these updates, the BLM can ensure a more comprehensive, adaptable, and ecologically responsible approach to resource management in the North Fork region.

It is essential to acknowledge that an inclusive, updated plan will foster long-term environmental health, community well-being, and economic sustainability, aligning with the overarching goals of responsible land management and stewardship. The integration of these updates will not only address current challenges but also provide a framework for adaptive management in the face of future uncertainties. By prioritizing these considerations, the BLM can lay the foundation for a resilient and harmonious coexistence of ecological, social, and economic interests in the North Fork region, setting a precedent for sustainable resource management practices nationwide.