



March 22, 2017

U.S. Bureau of Land Management
2300 River Frontage Road
Silt, Colorado 81652
Email: blm_co_si_mail@blm.gov
Fax: (970) 876-9090

Re: Scoping–North Fork Mancos Master Development Plan (CO-N040-2017-050-EA)

Dear North Fork Mancos Master Development Plan Team:

Please accept and fully consider these comments on the North Fork Mancos Master Development Plan (NFMMDP), submitted by the Colorado Farm & Food Alliance (COFFA), Slow Food Western Slope (SFWS), and the Valley Organic Growers Association (VOGA).¹ Our groups share a common interest and purpose in monitoring current, proposed and potential oil and gas projects that could jeopardize Colorado’s farm and food economy, stakeholders, and livelihoods.

Colorado’s North Fork Valley is world renowned for its top-quality agricultural bounty. The area’s rural character, jaw-dropping scenery, and access to public lands together with its good water supplies, lightly-developed landscapes, clean air and dark skies bestow a unique appeal.

Oil and gas development in the North Fork Valley could have a deleterious effect on its rural character, its unique qualities of place, and on the essential “ingredients” of its terroir: those elements of the environment that come together to support its agricultural health and essence.

Abundant supplies of uncontaminated water, clean air, healthy soils are all requisite features of a healthy farm and food economy. As are the more tangible qualities of place: the highly scenic nature of the North Fork Valley, threaded by the world-famous West Elk Scenic Byway (which bisects the project area), the undeveloped public lands that surround the farms and ranches in the bottomlands and on the mesas, the bucolic pace and lifestyle.

¹ COFFA works to network farm to table stakeholders as conservation advocates, on the Western Slope and across the state. SFWS—part of Slow Food USA and the global Slow Food network of over 150,000 members in more than 150 countries—links the pleasures of the table with a commitment to protect the community, culture, knowledge and environment that make this pleasure possible. VOGA represents over 100 farmers and agriculture-related businesses, and networks the region’s organic, sustainable growers and family farms to secure and promote the benefits of sustainable agriculture. In addition, our organizations are joined by more than 25 agricultural operators and food and drink businesses, who have signed on below.

In general, we support energy policy and public lands management that directs industrial activities away from important agricultural areas and water supplies, and that encourages a sustainable future.

Increasing oil and gas activity in the upper North Fork is of great concern down valley. More industrial traffic on already overburdened farm to market roads will lead to more public safety risk and annoyance for residents and businesses, including farms and ranches.

Risks and rumors of contamination pose a direct threat to local businesses. Declining air quality jeopardizes those who work, recreate or spend time outdoors. Visual scarring decreases property values and economic opportunity, where visitors and residents alike cherish the rural surroundings.

Finally, perhaps the gravest risk to agriculture is not from the direct impacts of oil and gas development, as significant as these could be. Rather the harshest impacts may well come from the indirect, cumulative effect on climate from an expanding footprint of gas drilling, fracking, and development across the region.

Climate change threatens Colorado's farms and food system to a significant degree. Impacts are likely to include more wildfire, unpredictable freeze/thaw patterns, longer and hotter droughts with an increase in flooding, more pests, and more extreme heat days.²

Specifically, in regards to the NFMMDP the agency must complete a more robust analysis before it can properly consider the project.

Since the impacts from this project on its own and when taken with other similar, related and connected actions, are reasonably likely to be significant, an Environmental Impact Statement (EIS) is required.

Significant impacts include direct impacts given the likelihood of spills from operations, hundreds of which are reported each year in Colorado.³ Rural gas gathering pipelines remain poorly regulated in Colorado, a fact noted by the state oil and gas commission, and a further risk to those who rely on potentially impacted water supplies.⁴ Other direct impacts are likely to include wildlife mortality and habitat loss, and increased traffic on dangerous roads.

² USDA: "The Effects of Climate Change on Agriculture, Land Resources, Water Resources, and Biodiversity in the United States," May 2008. Conservation Colorado: "How Climate Change is Impacting Colorado's Agriculture Industry," Kayla Fratt, Nov 14, 2016. CIRES: "Colorado Climate Change Vulnerability Study," January 2015. U.S. EPA: "Climate Impacts in the Southwest," December 2016.

³ *Colorado Independent*: "More than 500 oil and gas spills reported in 2016, data shows," March 10, 2017. *Ft. Collins Coloradoan*: "Chevron cleaning up 4,800-gallon oil pipeline spill in Colorado," March 14, 2017. Center for Western Priorities: "2016 Colorado Oil and Gas Toxic Release Tracker," March 2017.

⁴ *Grand Junction Daily Sentinel*: "State regulators mull stricter rules for gas-gathering lines in rural areas," March 11, 2017. *Denver Post*: "Colorado pipeline spills happen in regulatory vacuum," February 23, 2015. Colorado Dept. of Regulatory Affairs: "Natural Gas Pipeline Safety," online at www.colorado.gov/pacific/dora/aboutgaspipelines: "The COPUC does not currently have jurisdiction over pipelines directly associated with gas production."

And beyond those direct impacts, the indirect and cumulative effects are also likely to be significant. We are troubled to note the agency suggesting it may “punt” on much of this analysis – including an additional dozen or more pads that might follow but which the scoping notice calls “speculative.”

Cumulative impacts especially are best considered under an EIS that will look at the totality of potential development in the project area, and consider connected, similar and related action across the region. Such cumulative effects analysis should consider, in part, the following:

1. Local, regional and national air quality impacts
2. Down-valley surface water impacts, from spills and sediments
3. Ground-water impacts, from spills and drilling mishaps
4. Impacts to wildlife habitat and connectivity
5. Impacts to agricultural lands and operations
6. Recreation, rural quality-of-life, and tourism impacts
7. Climate change impacts, adaptations and mitigations

Potential, possible, and probable impacts of the NFMMDP are likely to be significant. Furthermore, these impacts are likely to adversely affect the public resources and environment of the valley, and perhaps the farm and food businesses that are a core part of its economic foundation.

Therefore, we believe that before the BLM can consider this proposal, and before it can proceed any further, it must complete an EIS that properly considers and addresses these impacts.

Colorado’s family farm and local food economy relies on sound public lands management and sound land use.

From its water sources, hunting grounds, and grazing lands to the scenic backdrop that make local businesses viable and bring in needed “outside” dollars, the health and sustainable management of the valley’s public lands is paramount to its well-being.

The North Fork Valley’s economy relies more on protecting the natural amenities and resources of the valley than on exploiting them. Pinning hopes on yet another boom/bust extractive industry is a strategy for further economic malaise and stagnation.

Home to wineries, bed and breakfasts, retreat centers, markets and hundreds of farms, ranches, orchards, and farmsteads—the North Fork is not an appropriate place for new industrial development. Certainly, such cannot be considered until the BLM has fairly weighed what this activity means for the people, wildlife, and economy of the region.

Piece-meal development permitted under decades old land use plans, with no updated programmatic understanding or mitigation and scant cumulative impact analysis, severely risks the unnecessary and undue irretrievable damage of public lands and resources.

Further consideration of the NFMMDP requires BLM to complete an EIS.

In summation, it is our position that the BLM must:

1. Complete an EIS for the NFMMDP proposal before it can adequately consider whether and how to proceed.
2. Limit further leasing and development until programmatic analyses and planning frameworks are in place on National Forest and BLM lands.
 - a. Lack of an updated framework for this activity across the region fails to provide the agency with tools to consider climate, long term ecosystem-wide impacts, and other “programmatic” issues.
 - b. Lack of big picture analysis burdens local communities and area businesses struggling to plan for their future success; fails to account for cumulative impacts from related, similar and connected actions; and, does not provide the decision-maker information needed to properly manage public resources.
3. Provide public lands with updated management that recognize their watershed value, their top-quality wildlife habitat and connectivity, their backcountry, roadless and primitive areas, and for their recreational and scenic values. Of course, the public (current and future) deserve public lands management that accounts for the reality of climate change - as federal courts have recognized.

Thank you for considering our input on the North Fork Mancos Master Development Plan. Please notify us when you begin scoping an EIS, or if there is another opportunity for review, input or comment.

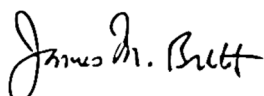
Sincerely,



Pete Kolbensschlag, Colorado Farm & Food Alliance



Emily Hartnett, Valley Organic Growers Association



Jim Brett, Slow Food Western Slope

NOTE: Additional signers follow.

These comments are also submitted on behalf of the following individual agricultural operators and food and drink proprietors.

Alison Gannett, Local Farms First - Paonia

Jason Trimm, Holy Terror Farm - Paonia

Nancy Mathis Rodriguez, Agape Farm & Retreat- Paonia

Emma Stopher-Griffin, Farm Runners - Paonia

Mark Waltermire, Thistle Whistle Farm - Hotchkiss

Kerry Noonan, Raincrow Farm - Paonia

Amy De Luca, Remedy Café - Paonia

Patti Burritt Locke, Locke Family Farms LLP - Hotchkiss

Rosemary Bilchak, Big Duck Land & Cattle Co., Inc. - Hotchkiss

Wendy Mitchell, Avalanche Cheese Company - Aspen & Paonia

Monica Wiitanen, Small Potatoes Bakery - Paonia

Brent Helleckson, Stone Cottage Cellars, Inc. - Paonia

James McCain, Fire Mountain Glass - Paonia

Nicole Carpenter, Grand Mesa Mushrooms - Paonia

Alfred Eames Petersen, Alfred Eames Cellars - Paonia

Don Lareau & Daphne Yannakakis, Zephyros Farm & Garden - Paonia

Lynn Gillespie, The Living Farm - Paonia

Leslie Bracewell, Leslie Bracewell Organic Farm - Paonia

Molly Moore, Mountain Poppy Foods - Delta County

Wayne Wiitanen, Small Potatoes Farm - Paonia

Ty Gillespie, Azura Cellars & Gallery - Paonia

Shawn Larson, Chrysalis Barrel Aged Beer - Paonia

Steve Ela, Ela Family Farm - Hotchkiss

Beth A. Karberg & Frank Stonaker, Osito Orchard - Hotchkiss

Lesandre Holiday Barley, Rub'n'Restore - Paonia

Jacob Gray, Gray Acres - Paonia

NFMMDP Scoping Comment: Colorado Farm & Food Alliance, Slow Food Western Slope,
Valley Organic Growers Association

Cc: Delta County Board of County Commissioners
Gunnison County Board of County Commissioners
Rep. Scott Tipton
Sen. Cory Gardner
Sen. Michael Bennet
Gov. John Hickenlooper
Rep. Millie Hamner
Sen. Kerry Donovan
Mr. Don Brown, Colorado Agriculture Comm.