

**Colorado Environmental Coalition ♦ Environment Colorado
Natural Resources Defense Council ♦ San Luis Valley Ecosystem Council
Sierra Club ♦ The Wilderness Society ♦ Western Colorado Congress
Western Resource Advocates ♦ WildEarth Guardians ♦ Wilderness Workshop**

October 16, 2008

Jamie Connell
Field Manager
Bureau of Land Management
50629 Highways 6&24
Glenwood Springs, CO 81601

Dave Stout
Field Manager
Bureau of Land Management
2103 East Park Avenue, P.O. Box 68
Kremmling, CO 80459

Dear Ms. Connell and Mr. Stout:

We are writing in support of the requests made to your agency by several local governments with cooperating agency status to ensure that a Health Impact Assessment (HIA) is included in the Draft Environmental Impact Statement for the Kremmling and Glenwood Springs Resource Management Plan (RMP) revisions. It is our understanding that such requests have been made by Eagle and Pitkin Counties, the Cities of Rifle and Glenwood Springs, and the Towns of Carbondale and New Castle.

The National Environmental Policy Act (NEPA) intends that human health be thoroughly considered in any Environmental Impact Statement. Congress stated that "...it is the continuing responsibility of the Federal Government to use all practicable means...to improve and coordinate Federal plans, functions, programs, and resources to the end that the Nation may...assure for all Americans safe, healthful, productive and aesthetically and culturally pleasing surroundings.." and "...attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences..."¹ NEPA implementing regulations direct agencies to consider "the degree to which the proposed action affects public health or safety."² These regulations also state that Federal agencies shall to the fullest extent possible "Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment."³

Two recent papers authored by environmental health experts at the University of Colorado's School of Public Health, attached to this letter, recently examined available

¹ 42 USC § 4331

² 40 CFR 1508.27(b)2

³ 40 CFR 1500.2(f)

information regarding the health effects of oil and gas drilling and production on neighboring communities, including information specific to Garfield County. Some of their conclusions that are relevant to the upcoming RMP revisions include:

- Air and water quality studies conducted to date indicate that potential exposures to hazardous emissions exist.
- Many air toxics are essentially unmeasured in Garfield County and current plans for further air sampling may not be comprehensive enough to enable public health officials to determine the community health impact of oil and gas development.
- Preliminary testing results indicate that ozone levels in some places are exceeding National Ambient Air Quality Standards and may be hazardous to humans.
- There are no plans for comprehensive and systematic monitoring of surface and subsurface waters.
- Environmental monitoring must be relevant to the areas where oil and gas development activity is occurring and the results must be readily available to the public. Unbiased interpretation of the results must occur in a timely manner and be made available to the public.
- It is important not to ignore what is already known. There is an immediate need for specific information on exposures and the impact from oil and gas development on all aspects of human health.
- An adequate monitoring program should be developed through a rigorous scientific process that addresses all currently recognized data gaps and health risks. This process should be developed in a transparent and explicitly unbiased way.
- A Health Impact Assessment (HIA) is a practical tool to evaluate future impacts, alternatives and appropriate strategies to promote and protect human health.

As has been noted in other letters, the Bureau of Land Management (BLM) already issued a Draft EIS for oil and gas development in Alaska that included a section on public health impacts and discussion of mitigation measures for these impacts. It is unclear to us why this process is not being replicated in other BLM EIS processes. Such efforts would avoid what recently happened in Pinedale when the Environmental Protection Agency (EPA) pointed out the lack of effective and enforceable mitigation strategies to ensure public health protection. Industry already uses the HIA in overseas operations, so it would not be a new burden for industry.

We strongly support the requests made by local governments, and we call on the BLM to include a full, comprehensive Health Impact Assessment in the Kremmling and Glenwood Springs RMP revisions, and anywhere else where oil and gas operations will have significant impact in Colorado, the Rocky Mountain region, or elsewhere. If you would like to discuss this further, please contact Amy Mall at 720-565-0188 or Peter Hart at 970-963-3977.

Sincerely,

Joe Neuhof
West Slope Field Director
Colorado Environmental Coalition

Steve Smith
Assistant Regional Director
Central Rockies Region
The Wilderness Society

Keith Hay
Energy Advocate
Environment Colorado

Mark Schofield
Director of Organizing
Western Colorado Congress

Amy Mall
Senior Policy Analyst
Natural Resources Defense Council

Mike Chiropolos
Lands Program Director
Western Resource Advocates

Christine Canaly
Director
San Luis Valley Ecosystem Council

Jeremy Nichols
Climate and Energy Program Director
WildEarth Guardians

Kirk Cunningham
Conservation Chair
Sierra Club Rocky Mountain Chapter

Peter Hart
Conservation Analyst/Staff Attorney
Wilderness Workshop

cc: State Director Sally Wisely