

## The Community Alternative: The Middle Ground Solution

The Community Alternative is a reasonable final plan for the Roan Plateau Planning Area, crafted by thoughtful citizens, energy experts, and local communities. Thus far the Community Alternative has been unanimously supported by the Towns of Silt, New Castle, and Carbondale councils because it provides opportunity to contribute significantly to the nation's energy supply while protecting the best natural features of this popular area. The Community Alternative's central feature – no drilling on the public lands on top of Roan Plateau – has also been recently endorsed by the Glenwood Springs City Council.

**[Secretary of Interior Gale] Norton said the government's role in protecting the environment should rely less on strict regulation than on setting high standards and encouraging innovation in meeting them. *Casper Star Tribune*, November 27, 2004**

By reconfiguring elements from within several of the draft alternatives as outlined below, the Community Alternative offers the “community-supported” plan that so many already support for Roan Plateau.

### HONOR Communities' vision for Roan Plateau

#### **1. Keep drilling off the top; produce large volumes of gas from the base**

The final plan for the Roan Plateau Planning Area should comply with what local municipalities have asked: that drilling be kept off the public lands atop Roan Plateau. **Specifically, the BLM should defer all leasing on top during the life of the management plan or unless and until gas resources can be extracted from under the Plateau without disturbing the surface.** *This change builds on the idea of “deferring leasing” of some lands, contemplated in the draft plan (in Alternative III), and strengthens it to honor what the public has supported, that the public lands on top of the Plateau be managed for public uses other than oil and gas drilling while working to meet toward the Interior Secretary's stated goal “to encourage innovation” by creating incentives for entrepreneurs to advance technologies.*

Well-managed gas development, based on ever-improving technologies, should continue at the base of the Plateau. **The BLM should concentrate oil and gas development in that production area, taking advantage of existing roads and infrastructure and better access to the gas fields for continued large-volume gas production.** *Analysis of figures in the draft plan shows that this approach will allow development of between 85% and 99% of the federal natural gas likely to be produced from the Planning Area over the next twenty years. That means that between 940 and 1549 billion cubic feet of gas can be produced from the Planning Area over the next twenty years, without drilling on the top of the Plateau, under the draft's range of alternatives.*

*Allowing for even a small amount of gas leasing on top of the Plateau under any of the alternatives in the draft plan, would commit the top to eventually becoming an industrial area of hundreds or thousands of wells. Contemplation of such an irretrievable decision should be postponed until future management plans are developed and until after technologies have improved sufficiently to avoid drilling or other energy development on the top and cliffs.*

*Some industry experts believe that technology already exists that could extract much of the natural gas from underneath the Plateau without drilling on top. In any case, during the life of the twenty year plan, it is likely that the majority – if not all – of the “recoverable” gas under Roan Plateau itself will be accessible through directional drilling and other rapidly improving technologies. New and existing technologies also hold promise to improve recovery of additional gas from current and future drilling at the base. This approach allows time for technologies to advance before developing additional gas that may lie beneath the top and cliffs, while providing industry opportunity to continue to improve development at the base.*

## **PROTECT Roan Plateau's natural and recreation values**

### **2. Strong protections for natural resources and public use**

The BLM should strengthen stipulations to safeguard Roan Plateau's ecological values and to protect the area's popular backcountry and primitive recreation opportunities. **The final plan should expand the permanent protective stipulations contemplated in the draft management plan (in Alternative II) – including the provision that no ground disturbing activities be allowed on certain lands** to provide the strongest protections for important natural resources, sensitive habitats, and backcountry opportunities.

*The Community Alternative expands the areas of critical environmental concern proposed in Alternative II and recommends strengthened stipulations to provide protections for these four areas (Trappers Creek, East Fork Canyon, Magpie Gulch, and Anvil Points). In earlier comments, Colorado Division of Wildlife staff recommended the creation of these four ACECs, and supported stipulations disallowing surface disturbing activities. The Community Alternative carries that recommendation forward, and recommends slightly expanded boundaries of 40,495 acres (an increase of 4,311 acres from Alt. II). The Community Alternative would include protections for streams found to be eligible for designation under the Wild and Scenic Rivers Act (from Alt. II).*

**The final plan should include the Parachute Watershed Area (derived from Alternative III).**

*The Community Alternative includes a watershed management area for Parachute Creek (with acres as proposed in Alt. III), allowing for increased local input regarding public lands projects proposed in the watershed.*

## **PROMOTE Recreation opportunities**

### **3. Agency commitment to maintain Roan Plateau's public lands for recreational use**

The final plan should designate two Special Recreation Management Areas (SRMA), one above the rim and one below the rim, offering backcountry and developed recreation opportunities, and should manage those areas to maintain those opportunities. As it stands, the draft alternatives do not offer any long-term protection, or meaningful management direction for Hubbard Mesa SRMA (Alts. II, III and IV; Alts. I and V do not propose any SRMAs). The draft plan specifically states (at page 4-198) that:

Alternative II [as well as Alternatives III and IV] does not propose a long-term commitment to managing the physical, social, and managerial settings to sustain the current and targeted recreational experience [at Hubbard Mesa]...

**Instead, the BLM should protect the Hubbard Mesa SRMA with No-Surface-Occupancy stipulations for any oil and gas development that may occur there, and should immediately develop a community-supported implementation plan and prioritize funding for appropriate signage and facilities.**

**The BLM should add back into the plan, a 32,639 acre SRMA atop the Plateau (with affirmative management approaches similar to those proposed for Hubbard Mesa) to protect the Plateau's backcountry opportunities, including hunting, outfitting, backpacking, hiking and horseback riding. The final plan should limit motorized and mechanized travel to designated routes (from Alternative II).**

*The Community Alternative would manage Hubbard Mesa SRMA for the purposes of motorized and mechanized, trail-oriented recreation and would convene a stakeholder group to develop a recreation plan for the area. The Roan Plateau SRMA, comprised of most of the public lands on top of the Plateau, was first proposed by the BLM in an earlier preliminary alternative that was supported by local governments and citizens, but is not included in any of the BLM's current draft alternatives. Like Hubbard Mesa, Roan Plateau SRMA should be actively managed to protect, maintain, and enhance its backcountry recreational values, as consistent with other stipulations and uses.*

*Protection for the important backcountry recreational opportunities atop Roan Plateau and those in the popular Hubbard Mesa area, would help ensure that backcountry, middle-country, and opportunities for mountain biking and motorized use remain available, while being actively managed to promote responsible use and avoid user conflict.*

## **RESPECT Communities' and residents' quality-of-life during energy development**

### **4. Use of Best Management Practices and emphasis on resource protection**

The BLM should require that industry always use Best Management Practices and technologies that minimize environmental and community impacts in future development on any of the area's public lands. **The final plan should emphasize protection for the area's important natural resources (examples in Alternative II and as noted in points 1, 2, and 3 above).**

*In the two-thirds of the Planning Area where natural gas drilling and development will continue under the balanced Community Alternative proposed here, the BLM should set high standards and require that industry do it right.*

*As a public agency, the BLM should emphasize protection of the area's other public and natural resources. In addition to their ecological importance, the public lands of the Roan Plateau area are an important community resource, and many of these lands border residential areas. The BLM should ensure that oil and gas development on the public domain respect the public that actually use, live beside, and share these lands.*

#### **SUMMARY-**

### **THE COMMUNITY ALTERNATIVE AND ENERGY DEVELOPMENT IN GARFIELD COUNTY**

Under the Community Alternative, substantial energy development would continue in the Roan Plateau Planning Area along with a future for the industry in our communities. Looking at all five alternatives in the draft plan, a comparative analysis shows that between 85% and 99% of the federal natural gas likely to be produced from the Planning Area over the 20-year life of the plan would come from the base. Without any leasing or drilling on top, and looking at the draft's projections, during this plan between 970 and 1320 billion cubic feet (bcf) of natural gas is likely to be produced from drilling at the base. (This range looks at Alt. I as a minimum, since it would only allow development on existing leases and Alt. IV as the high end, since Alt. V seems unlikely due to the far ranging resource damage it would allow) .

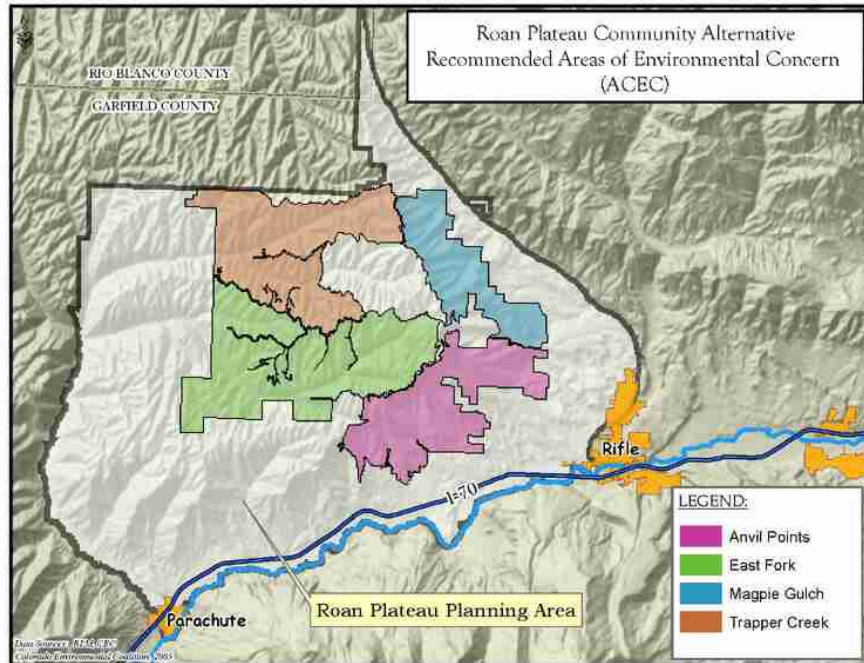
Adopting the Community Alternative – and thus prohibiting drilling on the public lands on top – will not noticeably affect gas development in our region. Since additional leasing is certain under all four 'action' alternatives (i.e. excluding Alt. I but including Alt. V), the amount of gas produced under the Community Alternative from the base is likely to be higher than the 970 bcf projected under the 'no action' alternative (Alt. I). Narrowing the focus to three alternatives then (Alts. II, III, IV), without any leasing of the lands on top, a reasonable forecast would be that only between 58 and 193 bcf of gas that is otherwise projected to be developed would not be available under the Community Alternative.

Finally, within the twenty-year life of the plan, given rapid advancements in directional drilling and other technologies that can keep development off the top, additional reserves are likely to become available as more can be accessed from the base. But the final plan would need to include provisions that prohibit leasing the top during the plan, or that defer from leasing the lands on top until these technologies are available and employed.

In addition to the large amounts of gas likely to be produced from the Planning Area under the Community Alternative, some 94% of the natural gas from public lands in the Piceance Basin (which includes Roan Plateau) is already available from lands open to leasing or from lands already leased, according to a report by the federal government. Furthermore, many of the lands already leased have yet to be put into production, and drilling permits are being issued in record numbers with many permitted wells remaining to be drilled.

Over the next decades, and during the life of this plan, energy development will remain an active and growing presence in Garfield County, even without drilling the top of Roan Plateau. Some 10,000 wells are already forecast for Garfield County over the next two decades, according to officials with the Colorado Oil and Gas Association. The Community Alternative would ensure balance even as this activity occurs elsewhere inside, and all around, the Planning Area. The Community Alternative would protect Roan Plateau's top and cliffs for other public uses and values, while still allowing for large volumes of gas to be developed from the base and encouraging technologies and practices that better meet the needs of communities and protection for all our shared public lands.

**Together we can craft a better plan for Roan Plateau.**  
**Please join us in supporting the Community Alternative.**



The Community Alternative would designate the Trappers Creek, East Fork Canyon, Magpie Gulch and Anvil Points areas of critical environmental concern, and would disallow many surface disturbing activities within these four units.

The Community Alternative would protect all the backcountry recreational lands depicted on the Alternative I map, below at left, along with about 13,000 additional acres of ‘middle country’ recreational lands (used for dispersed camping, scenic drives, short hikes, picnics and outings, and the like) as the Roan Plateau Special Recreation Management Area. By contrast, oil and gas development under all four ‘action’ alternative would eliminate almost all the backcountry recreational opportunities the Plateau currently provides.

