

## **Response to Our Children's Trust Petition from the Members of Western Colorado Alliance's West Slope Youth Vote Program**

Pursuant to the Second Amended Case Management Order in Docket No. 200300071, West Slope Youth Vote (WSYV), a high-school student program run out of Western Colorado Alliance for Community Action (WCA), submits this response in support of the Petition submitted by Our Children's Trust which has been consolidated with this rulemaking.

West Slope Youth Vote is in agreement with Earth Guardians and Our Children's Trust on the point that protecting public health and the environment is the Colorado Oil & Gas Conservation Commission's (COGCC) number one obligation under Colorado law, as established by the recently enacted SB19-181. As stated in Earth Guardians' Initial Party Input on Mission Change Rulemaking, the COGCC's role is to regulate the oil and gas industry, not to foster or promote the industry.

On Colorado's western slope, including the Mesa, Delta, Montrose, Ouray, Gunnison, Eagle, and Garfield counties, climate change caused by greenhouse gas emissions has very egregious impacts, not only on the environment, but also on western slope communities. Those impacts have already begun to occur, and are a large contributing factor to the weather and environmental conditions we observe today. Note the following described weather conditions that have begun to take a toll on western slope residents:

Sparse moisture and warm temperatures over recent summers have quickly shrunk Colorado's snowpack while increasing local drought conditions and fire danger. Grand Junction, CO received only minimal amounts of precipitation during this year's spring and early summer, to the point that Mesa County and surrounding areas are already in severe drought, according to the U.S. Drought Monitor. The Colorado Climate Center is recommending an extreme drought categorization for eastern Mesa County, Delta, Gunnison and eastern Montrose counties, as well as some counties farther south, and it is recommending parts of southwest and southern Colorado be deemed as being in extreme drought. Garfield, Rio Blanco and Pitkin counties also should be considered for severe-drought status, according to the center's findings.

The Pine Gulch fire, 18 miles north of Grand Junction and recent as of early August, has grown to tens of thousands of acres and is marginally contained at the time of this statement. Personnel working to fight the quickly spreading fire are up against hot weather, single-digit humidity and afternoon winds. Mesa and Garfield counties are under Stage 1 fire restrictions, and the National Weather Service has issued an Air Quality Alert because of heavy smoke near the fire. While fire conditions have been worsening statewide, with all of Colorado now in some stage of drought, much of the Western Slope has reached the two worst stages of Extreme or Exceptional drought.

This prolonged drought on Colorado's western slope has captured the attention of global and nation-wide science and news organizations, such as the Washington Post and National Geographic. A recent Washington Post analysis (that featured students who are participants of

West Slope Youth Vote) finds that western slope counties have warmed more than 2 degrees Celsius, double the global average. Spanning more than 30,000 square miles, it is the largest 2C hot spot in the Lower 48. The average flow of the Colorado River, which supplies water to 40 million people, has declined nearly 20 percent over the past century, half of which is because of warming temperatures, scientists say. Much of the western economy is agricultural, and depends on the water the Colorado River provides.

While the oil and gas industry has a large presence in Grand Junction and other western slope cities, WSYV members and other residents fear the impacts climate change will have on our communities. It is the legal obligation and purpose of the COGCC to take facts such as those described into account before approving oil and gas permits, and to protect public health, safety, and the environment above all. To do that in an accountable, effective way, the COGCC needs to enact the rules and rule changes proposed by Our Children's Trust's petition.

Regarding the issues pointed out in the petition regarding the COGCC's rule series, many will have exceptional impacts on Colorado's western slope. For example, were the COGCC to edit its rules according to the **Issue Summary for 300 Series Rules: ISSUE ONE**<sup>1</sup>, the Commission would fully consider the climate change impacts each oil & gas project would have, including probable worsening drought and fire danger in western Colorado, seeing as current scientific evidence points to the area being one of the most impacted by climate change in the United States.

WSYV also concurs with Our Children's Trust on the point that the COGCC requires a Climate Adaptation and Mitigation Program ("CAMP") rule, as described in the **Issue Summary for 400 Series Rules: ISSUE TWO**<sup>2</sup>, to fulfill the mandate of SB 19-181.

West Slope Youth Vote is a program of youth aged fourteen to eighteen. Like the youth who filed the original 2013 petition for rulemaking, our members are inheriting the environment and climate that older generations leave behind. We hope the Commission will adopt the proposed rules to ensure that the public health, safety, and environment of today are protected and sustainable into the foreseeable future. Proper regulation of the oil and gas industry in Colorado is necessary, and is the role the COGCC exists to fulfill.

Dated: August 11, 2020  
Sierra A. Lloyd  
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<sup>1</sup> **Rules fail to conduct a preliminary analysis of the current status of impacts to public health, safety, welfare, the environment, and wildlife resources before granting additional permits for oil and gas operations.**

<sup>2</sup> **Lacking a Climate Adaptation and Mitigation Program – New Rule 438**