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Comments:

Dear Forest Service:

As the Forest Service is currently weighing a decision on an amendment to the Colorado Roadless Rule that would unlock 170 million tons of coal for mining in Colorado, the undersigned business leaders, in opposition to the proposed amendment, urge adoption of the 'no action' alternative.

The supplemental draft Environmental Impact Statement published by the Forest Service evaluates the market and climate impacts of opening up more than 170 million tons of federally-owned coal over a 10-to-30-year period. The Forest Service's analysis shows that making Colorado roadless coal available would displace 40,000 gigawatt hours (GWh) of renewable energy production nationwide over a 38-year period, 2016-2054. The analysis found that the new supply of coal would lower the price of coal, and thus at the margin increase utilities' preference for coal compared to other potential fuel sources.

Suppressing 40,000 GWh of renewable energy is thus a significant impact to an industry that helps reduce climate and other pollution. As renewable energy businesses who provide thousands of Coloradans with clean power, we support a rapid transition to renewable energy, and a decision to open 20,000 acres of Colorado's roadless lands to coal mining would, by the agency's own analysis, result in more coal burning at the expense of the production and sale of renewable energy over a period of more than three decades.

In addition to renewable energy displacement, the Forest Service calculates that this proposal would result in a net increase of 130 million tons of carbon dioxide pollution between 2016 and 2054, and that this pollution will cause billions of dollars in costs to the global environment and economy. The resultant net increase in carbon dioxide emissions would move our nation in precisely the wrong direction from a climate change perspective, and damage our international credibility.

We therefore oppose opening 20,000 acres of publicly-owned roadless forest to coal mining, and we urge the Forest Service to adopt Alternative A, the 'no action' alternative.

We appreciate the Forest Service's analysis of the impact of increased federal fossil fuel mining on renewable energy, and thank you for the opportunity to comment.

Respectfully,

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