

November 10, 2021

Tracy Stone-Manning
Director, Bureau of Land Management
1849 C St., NW, Rm. 5665
Washington, D.C. 20240

Re: Request for Extension of Comment Periods on BLM Oil & Gas Leasing Proposals

Dear Director Stone-Manning:

Congratulations on your recent confirmation as Director of the Bureau of Land Management (BLM). We look forward to engaging with you and your staff, as you work to address the many challenges facing our public lands and waters.

One of those challenges involves BLM's oil and gas leasing program. Because of recent court decisions, BLM is now evaluating at least eight different leasing proposals for over 700,000 acres of public land in ten states.¹ BLM recently released draft NEPA documents for these proposals, and has provided the public with comment periods of just 30 days. Additionally, each comment period expires immediately after the upcoming holiday.² As a consequence, the public will not be able to participate in the decision-making process for these proposals "to the fullest extent possible," as required by NEPA and FLPMA.³

Accordingly, we respectfully request that BLM extend the comment periods for all eight of these leasing proposals by at least 60 days.

Like many others, we had hoped that if leasing were ever to resume on our public lands, it would be *after* the Department of the Interior (DOI) had enacted far-reaching reforms that address the long-standing impacts of the oil and gas program on our climate and public lands, waters, and wildlife. However, to date, DOI has yet to advance any meaningful reforms, and has still not issued a much-anticipated report on the federal oil and gas programs. Thus, the need to maximize public involvement on these proposals is heightened by the lack of progress on oil and gas reforms.

We are also concerned by an apparent disconnect between these leasing proposals and recent comments from DOI leadership.⁴ Last week, DOI publicly stated that the department is "doing whatever [it] can" to address the climate impacts of the oil and gas program. A senior official also publicly acknowledged that DOI has seen "limited public input opportunities" throughout the oil and gas program. To act on these statements, DOI needs to address the climate impacts of these leasing proposals and afford the public ample opportunity to provide meaningful comment. Unfortunately, the roughly concurrent 30-day comment periods for the eight leasing proposals, all of which expire immediately after a federal holiday, do not allow for such meaningful comment.

For these reasons, we do hope you will seriously consider granting our request.

¹ BLM is currently evaluating proposed oil and gas lease sales in Alabama, Colorado, Montana, Nevada, New Mexico, North Dakota, Oklahoma, Utah, and Wyoming and suspended leases in Arizona.

² All of the comment periods end between Nov. 27 and Dec. 1.

³ *W. Watersheds Project v. Zinke*, 441 F. Supp. 3d 1042, 1070 (D. Idaho 2020).

⁴ Michael Doyle & Jennifer Yachnin, *Haaland makes COP 26 pitch*, E&E News, Nov. 4, 2021.

Sincerely,

Archaeology Southwest

Center for Civic Policy

Citizens Caring for the Future

Coalition to Protect America's National Parks

Conservation Colorado

Diné Citizens Against Ruining our
Environment (CARE)

Environment America

Friends of the Missouri Breaks Monument

GreenLatinos

Hispanic Access Foundation

Hispanics Enjoying Camping, Hunting, and the
Outdoors (HECHO)

League of Conservation Voters

League of Oil and Gas Impacted Coloradans

Montana Conservation Voters Education
Fund

Montana Wildlife Federation

National Audubon Society

National Parks Conservation Association

National Wildlife Federation

Natural Resources Defense Council

Nevada Wildlife Federation

New Mexico & El Paso Region Interfaith
Power & Light

New Mexico Voices for Children

New Mexico Wild

New Mexico Wildlife Federation

ProgressNow New Mexico

Public Land Solutions

Rocky Mountain Farmers Union

Rocky Mountain Wild

San Juan Citizens Alliance

Sierra Club

Social Eco Education (SEE-LA)

The Wilderness Society

Upper Missouri Waterkeeper

Western Colorado Alliance

Western Organization of Resource Councils

Wild Montana

Wilderness Workshop

Wyoming Outdoor Council