

**Powder River Basin Resource Council * Western Environmental Law Center
Natural Resources Defense Council * Sierra Club
Western Organization of Resource Councils * Friends of the Earth * WildEarth Guardians**

Via first-class and electronic mail

April 15, 2015

Sally Jewell
Secretary, Department of Interior
1849 C Street, N.W.
Washington DC 20240

Neil Kornze
Director, Bureau of Land Management
1849 C Street NW, Rm. 5665
Washington, DC 20240

Dear Secretary Jewell and Director Kornze,

We are writing to follow up on our June 19, 2014 letter that raised serious concerns about the Bureau of Land Management's (BLM's) proposed Buffalo Field Office Resource Management Plan (Buffalo RMP) revision. Finalizing the Buffalo RMP in its current form would commit more than 15 billion tons of unnecessary carbon pollution to the Department of Interior's ledger and cement BLM's place as an agency that is dramatically out of step with the Obama Administration's stated climate objectives. On behalf of our millions of members, we reiterate our call that you reject the Buffalo RMP revision in its current form. A copy of our previous correspondence is attached for your reference.

Since our June 2014 letter, the basis for our concerns has grown with new data and information related to the climate change impacts of leasing and developing our nation's fossil fuel resources, including those within the Buffalo RMP planning area.

In January 2015, *Nature* published a peer-reviewed study concluding that in order to meet internationally-accepted climate targets (and keep global mean temperatures within 2 °C of preindustrial times), globally a third of all oil reserves, half of all gas reserves, and more than 80 percent of coal reserves must remain in the ground through 2050.¹ Notably, a recent report from the Center of American Progress and The Wilderness Society found that greenhouse gas emissions from federal oil, gas, and coal account for more than 20 percent of all U.S. greenhouse gas emissions and 24 percent of all U.S. energy-related emissions.² Specifically regarding the planning area, the report found that emissions associated with federal coal from Wyoming and Montana—primarily in the Powder River Basin—accounts for 10 percent of all U.S. greenhouse gas emissions.

The White House Council on Environmental Quality (CEQ), in its *Revised Draft Guidance for Greenhouse Gas Emissions and Climate Change Impacts*, recently affirmed the use of tools such as the

¹ Christophe McGlade and Paul Elkins, *The Geographical Distribution of Fossil Fuels Unused When Limiting Global Warming to 2 °C*, *NATURE*, Jan. 8, 2015, at 187-90.

² Claire Moser *et al.*, *Cutting Greenhouse Gas from Fossil-Fuel Extraction on Federal Lands and Waters*, *CENTER FOR AMERICAN PROGRESS*, Mar. 19, 2015, available at: <https://www.americanprogress.org/issues/green/report/2015/03/19/108713/cutting-greenhouse-gas-from-fossil-fuel-extraction-on-federal-lands-and-waters/>.

social cost of carbon to disclose quantitative estimates of GHG emissions to provide agency decisionmakers and the public with meaningful context for NEPA review.³ *See also* 40 C.F.R. § 1508.25(c). By applying a Interagency Working Group social cost of carbon central value of \$43 per ton (in 2007\$),⁴ greenhouse gas emissions in the Buffalo planning area amounts to \$407,997,244 of economic harm per year from fossil fuel production alone. Adding in the ultimate combustion of this coal, oil, and gas results in over \$55 billion of additional harm per year.

The Buffalo RMP and its proposed ten billion tons of coal development and thousands of new oil and gas wells continue to stand in opposition to the President’s climate agenda. Just last month, the President announced a new executive order that requires the federal government to cut greenhouse gas emissions by 40 percent by 2025 from 2008 levels. However, these reductions will be meaningless if they are dwarfed by the substantial emissions that will occur from the leasing, extraction, and combustion of coal, oil, and gas within the Buffalo planning area.

We are pleased that Secretary Jewell recently called for, “an honest and open conversation about modernizing the federal coal program,” and asked: “[h]ow do we manage the program in a way that is consistent with our climate objectives?” We could not agree more that it is time for our nation to have that conversation. Given its long-term and significant implications in terms of locking in BLM to decades of federal coal, oil, and gas development and corresponding climate impacts, the Buffalo RMP is an appropriate place to start that conversation.

Thank you for your time and consideration. We look forward to a response to this letter and to having future conversations with you and your staff about ways to modernize the federal coal program to achieve lasting benefits for the American public.

Sincerely,

Shannon Anderson
Staff Attorney, Powder River Basin Resource Council
934 N. Main St.
Sheridan, WY 82801

Kyle J. Tisdell
Attorney, Climate & Energy Program Director
Western Environmental Law Center
208 Paseo del Pueblo Sur, #602
Taos, New Mexico 87571

³ Council on Environmental Quality, *Revised Draft Guidance for Greenhouse Gas Emissions and Climate Change Impacts*, Dec. 18, 2014, at 15-16, available at: <http://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/ghg-guidance>.

⁴ *See* Interagency Working Group on the Social Cost of Carbon, United States Government, *Technical Support Document: Technical Update on the Social Cost of Carbon for Regulatory Impact Analysis – Under Executive Order 12866* (May 2013) at 2.

Theo Spencer
Senior Policy Advocate, Climate and Clean Air Program
Natural Resources Defense Council
40 W. 20th St.
New York, NY 10011

Athan Manuel
Director, Lands Protection Program
Sierra Club
50 F Street, NW
Washington, D.C. 20001

Marissa Knodel
Friends of the Earth
1100 15th St. NW, 11th Floor
Washington, D.C. 20005

Bob LeResche
Chair, Western Organization of Resource Councils
220 S. 27th St.
Billings, MT 59101

Jeremy Nichols
Climate & Energy Program Director
WildEarth Guardians
1536 Wynkoop St., Ste 310
Denver, CO 80202

cc: Brian Amme, Matt Magaletti, Tom Bills, and Duane Spencer