Via first-class and electronic mail

April 15, 2015

Sally Jewell  Neil Kornze
Secretary, Department of Interior  Director, Bureau of Land Management
1849 C Street, N.W.  1849 C Street NW, Rm. 5665
Washington DC 20240  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. 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. 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The White House Council on Environmental Quality (CEQ), in its Revised Draft Guidance for Greenhouse Gas Emissions and Climate Change Impacts, recently affirmed the use of tools such as the


social cost of carbon to disclose quantitative estimates of GHG emissions to provide agency
decisionmakers and the public with meaningful context for NEPA review.\textsuperscript{3} See also 40 C.F.R. §
1508.25(c). By applying a Interagency Working Group social cost of carbon central value of $43 per ton
(in 2007$),\textsuperscript{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,

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\textsuperscript{3} Council on Environmental Quality, \textit{Revised Draft Guidance for Greenhouse Gas Emissions and Climate Change Impacts},

at 2.
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