

From: [Landreth, Natalie A](#)
To: [Annatoyn, Travis J](#); [Scott, Janea A](#)
Cc: [Sanchez, Alexandra L](#); [Jain, Ruchi](#)
Subject: RE: Guidance for setting up listening sessions
Date: Friday, February 19, 2021 1:43:20 AM

Hello –

Intriguing idea. Is there a specific audience in mind?

Natalie

From: Annatoyn, Travis J <travis_annatoyn@ios.doi.gov>
Sent: Thursday, February 18, 2021 5:03 PM
To: Scott, Janea A <janea_scott@ios.doi.gov>; Landreth, Natalie A <natalie_landreth@ios.doi.gov>
Cc: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Jain, Ruchi <ruchi_jain@ios.doi.gov>
Subject: RE: Guidance for setting up listening sessions

Thanks Janea. I'm looping in Deputy Solicitor for General Law Ruchi Jain in case we end up talking about FACA, etc. (We should steer clear of FACA!)

(b) (5)

[Redacted]

[Redacted]

[Redacted]

From: Scott, Janea A <janea_scott@ios.doi.gov>
Sent: Thursday, February 18, 2021 2:28 PM
To: Annatoyn, Travis J <travis_annatoyn@ios.doi.gov>; Landreth, Natalie A <natalie_landreth@ios.doi.gov>
Cc: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: Guidance for setting up listening sessions

Good afternoon Travis and Natalie,

The ASLM team and I are considering setting up some listening sessions regarding Interior's tasks under E.O. 14008. These sessions would be announced publicly. (b) (5)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

We'd warmly

welcome your input on this. We could set up some time to discuss or we can iterate by email. Please advise.

Take care,
Janea

Janea A. Scott (she/her)
Senior Counselor to ASLM
U.S. Department of the Interior
janea_scott@ios.doi.gov
202-742-0942

From: [Daniel-Davis, Laura E](#)
To: [Sanchez, Alexandra L](#)
Subject: catching up on the report ... and more
Date: Thursday, February 18, 2021 4:26:44 PM

Do you want to catch time this weekend to talk about the fossil report, and set ourselves regular check ins besides? I can also put a meeting on at 3 pm Monday if you want to do during the week - and we can still look for regular time? I'm trying to get ahold of my schedule before I get further steamrolled.

Let me know!

Laura

From: [Nguyen, Davie T](#)
To: [Sanchez, Alexandra L](#)
Cc: [Buckner, Shawn M](#); [Steele, Jonathan](#); [Simon, Benjamin M](#)
Subject: RE: Policy office contact?
Date: Thursday, February 18, 2021 3:40:59 PM

Sounds great- I'll go ahead and get something on our calendars for Tuesday at 3:30pm.

Talk to you then!

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Thursday, February 18, 2021 3:31 PM
To: Nguyen, Davie T <davie_nguyen@ios.doi.gov>
Cc: Buckner, Shawn M <shawn_buckner@ios.doi.gov>; Steele, Jonathan <Jonathan_Steele@ios.doi.gov>
Subject: RE: Policy office contact?

Hi Davie,

It was nice to meet you and Jon yesterday! Thank you for taking the time.

On question 1, we are looking at all of 208. On question 2, the BOEM team is putting together information already. I would have to get back to you about the BLM side though. I think as I get just a little further along, I will have a better idea on how we can most effectively work together on this, as I've been told you will be a great resource. And I'm sure I will need the guidance you have to offer!

Tuesday at 3:30 works for me. Not sure how many questions I will have at that point, but would be great to have some background info on the royalty program and some time to clarify the information you all are pulling.

Thanks so much,
Alex

From: Nguyen, Davie T <davie_nguyen@ios.doi.gov>
Sent: Thursday, February 18, 2021 3:04 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Cc: Buckner, Shawn M <shawn_buckner@ios.doi.gov>; Steele, Jonathan <Jonathan_Steele@ios.doi.gov>
Subject: RE: Policy office contact?

Hi Alex,

Thanks for meeting with us yesterday. PPA has started pulling together materials pertaining to royalties and other elements of Section 208. We'd be happy to share some preliminary information

as early as next week. We did want to follow-up on a few items to make sure we can be responsive to your request and timeline:

1. Section 208 has what we see are two separate but related components (conventional energy review and royalties). Are you looking at Section 208 in its entirety or more specifically at royalties?
2. Are you aware of any other efforts within DOI on the comprehensive review as directed by the EO? We suspect that some of the more quantitative information you might need will be at the bureau level- is there any desire to seek input from the affected bureaus? If so, PPA can help coordinate data needs.

Would you be available to meet with us next Tuesday, 2/23 at 3:30pm EST? We'd like to have one of our economists join to answer any questions you may have about royalties. This would also give us an opportunity to clarify the information we're pulling together for you.

Let me know if you have any questions in the interim and looking forward to working with you- thanks!

Davie Nguyen
Office of Policy Analysis
U.S. Department of Interior
(202) 208 - 3561

From: Steele, Jonathan <Jonathan_Steele@ios.doi.gov>
Sent: Wednesday, February 17, 2021 1:10 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Cc: Buckner, Shawn M <shawn_buckner@ios.doi.gov>; Nguyen, Davie T <davie_nguyen@ios.doi.gov>
Subject: Re: Policy office contact?

Hi Alex,

Yes, I'm still available. If it's okay, I'll have Davie Nguyen from our office join us. I'll send an invite shortly.

Jonathan

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Wednesday, February 17, 2021 1:04 PM
To: Steele, Jonathan <Jonathan_Steele@ios.doi.gov>
Cc: Buckner, Shawn M <shawn_buckner@ios.doi.gov>
Subject: RE: Policy office contact?

Yes, that works! Sorry for the late reply, let me know if you're still available.
Thanks,

Alex

From: Steele, Jonathan <Jonathan_Steele@ios.doi.gov>
Sent: Wednesday, February 17, 2021 11:08 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Cc: Buckner, Shawn M <shawn_buckner@ios.doi.gov>
Subject: Re: Policy office contact?

Hi Alex,

I'm available at 3 today to talk. Does that time still work for you?

Thank you,
Jonathan

Jonathan Steele
Deputy Director
Office of Policy Analysis
O: 202-208-4839
C: 202-236-2772
Jonathan_Steele@ios.doi.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Tuesday, February 16, 2021 4:02 PM
To: Buckner, Shawn M <shawn_buckner@ios.doi.gov>
Cc: Steele, Jonathan <Jonathan_Steele@ios.doi.gov>
Subject: Re: Policy office contact?

Hello all, nice to be connected!! I can do tomorrow afternoon after 3. Is there a 30 minute slot that works for you?

Thanks,
Alex

From: Buckner, Shawn M <shawn_buckner@ios.doi.gov>
Sent: Tuesday, February 16, 2021 12:05:51 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Cc: Steele, Jonathan <Jonathan_Steele@ios.doi.gov>
Subject: FW: Policy office contact?

Hi Alex,

Please let me know when you would like to meet, so we can discuss further.

Thank you,
Shawn

Shawn M. Buckner
Director
Office of Policy Analysis
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240
Mobile: (202) 669-1320

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Friday, February 12, 2021 2:59 PM
To: Taylor, Rachael S <rachael_taylor@ios.doi.gov>
Cc: Glomb, Steve J <Steve_Glomb@ios.doi.gov>; Buckner, Shawn M <shawn_buckner@ios.doi.gov>
Subject: Re: Policy office contact?

Thanks Rachael! Steve and Shawn - I'll send Alex Sanchez your way if that works.

Best,
Laura

From: Taylor, Rachael S <rachael_taylor@ios.doi.gov>
Sent: Friday, February 12, 2021 2:52 PM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Cc: Glomb, Steve J <Steve_Glomb@ios.doi.gov>; Buckner, Shawn M <shawn_buckner@ios.doi.gov>
Subject: RE: Policy office contact?

I think Steve and Shawn might be the right folks to help the LMM hallway out – making the connect here and asking for them to be on deck to help. Thanks, Laura.

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Friday, February 12, 2021 2:51 PM
To: Taylor, Rachael S <rachael_taylor@ios.doi.gov>
Subject: Policy office contact?

Hi there,
Alex Sanchez of my team is working on the fossil fuel review directed by Sec 208 of the Jan. 27 Climate EO, and I'd like to link her up with the right person in your policy shop to go through internal reports, docs, etc that can inform the review. Who should she talk to?

Thanks!
Laura

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From: [Knodel, Marissa S](#)
To: [Scott, Janea A](#); [Sanchez, Alexandra L](#); [Diera, Alexx A](#)
Cc: [Lefton, Amanda B](#)
Subject: RE: Questions for O&G review process discussion
Date: Thursday, February 18, 2021 9:09:32 AM

Hey all,

I just realized that Amanda and I have an overlapping call at 11:00 a.m. ET this morning with the Coast Guard.

Amanda – I’m assuming this means we have to skip our check-in with the team this morning? Should we try to find an alternative time?

Peace,

Marissa

From: Knodel, Marissa S
Sent: Wednesday, February 17, 2021 6:56 PM
To: Scott, Janea A <janea_scott@ios.doi.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Diera, Alexx A <alex_x_diera@ios.doi.gov>
Cc: Lefton, Amanda B <amanda_lefton@ios.doi.gov>
Subject: Questions for O&G review process discussion

Hello all,

Thank you all for the robust discussions about how to conduct the outreach process for the comprehensive O&G review. I confess I’m still process, but started a list of questions to help inform our conversation tomorrow, though it’s not exhaustive and I welcome additions:

- What will the level of coordination be between BLM and BOEM? Should there be separate framing questions and meetings or should the agencies try to align as much as possible? Perhaps a hybrid model?
- Given the scope of the E.O. to review “oil and gas permitting and leasing activities” and fair return to taxpayers, should we include BSEE and ONRR and to what extent?
- Should these outreach meetings cover the comprehensive O&G review as well as renewable energy?
- Does the pause on new leasing extend until the end of this initial phase, or longer?
- The questions we use to request meetings and comments will be critical to the review and quality/quantity of information we receive, and should focus on scope, study factors, data/information, and advancement towards key administration goals (e.g. net zero emissions, environmental justice, Tribal/AK Native consultation, jobs).
- Process questions:
 - Should this initial phase involve a Request for Information (RFI) accompanied by a formal public comment period?

- Alternatively, should the outreach in this initial phase inform a RFI as part of the second phase?
- Suggestions and recommendations for an outreach process have included:
 - Virtual listening sessions
 - Location-based or “umbrella group”-based or both?
 - Length and how many?
 - “Workshops” with brief presentations followed by listening sessions
 - Location-based or “umbrella group”-based or both?
 - Length and how many?
 - Online portal for written comments
 - Open for public comments or targeted?
 - Hybrid approach

From: Scott, Janea A <janea_scott@ios.doi.gov>

Sent: Wednesday, February 17, 2021 1:48 PM

To: Knodel, Marissa S <marissa_knodel@ios.doi.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Diera, Alexx A <alex_x_diera@ios.doi.gov>

Cc: Lefton, Amanda B <amanda_lefton@ios.doi.gov>

Subject: Strawman draft agenda

From: Scott, Janea A

Sent: Wednesday, February 17, 2021 10:13 AM

To: Knodel, Marissa S <marissa_knodel@ios.doi.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Diera, Alexx A <alex_x_diera@ios.doi.gov>

Cc: Lefton, Amanda B <amanda_lefton@ios.doi.gov>

Subject: If you have some spare time

Here are a few examples of what I have in mind. For our 11am pacific call, I’m going to try and type up a quick initial agenda.

Link.

[2019 IEPR Workshops, Notices and Documents \(ca.gov\)](#)

Here’s what one of the workshop notices looks like.

[TN229736 20190913T143006 Notice of IEPR Commissioner Workshop on Near-Zero Carbon Electricity.pdf](#)

And here’s an agenda.

[TN229825 20190923T164225 Meeting Schedule - IEPR Workshop on Near-Zero Carbon Electricity](#)

.pdf

[TN229273_20190808T083731_Updated Meeting Schedule IEPR Lead Commissioner Workshop Climate.pdf](#)

Janea A. Scott (she/her)
Senior Counselor to ASLM
U.S. Department of the Interior
janea_scott@ios.doi.gov
202-742-0942

From: [Scott, Janea A](#)
To: [Diera, Alexx A](#); [Sanchez, Alexandra L](#); [Knodel, Marissa S](#)
Cc: [Lefton, Amanda B](#)
Subject: RE: Strawman draft agenda
Date: Wednesday, February 17, 2021 2:02:14 PM

Sorry for the confusion.

It is a recurring meeting to talk about offshore wind, so should be on Alex S, Marissa, and Amanda's calendars – not sure why it isn't but I asked our terrific admin team to please get it re-calendared.

Let's find another time to meet when folks are available or we can also iterate via email. I warmly welcome your comments on the strawman draft,

From: Diera, Alexx A <alex_x_diera@ios.doi.gov>
Sent: Wednesday, February 17, 2021 10:55 AM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Knodel, Marissa S <marissa_knodel@ios.doi.gov>; Scott, Janea A <janea_scott@ios.doi.gov>
Cc: Lefton, Amanda B <amanda_lefton@ios.doi.gov>
Subject: Re: Strawman draft agenda

I don't have an invitation either.

--

Alexx Diera (*she/her*)

Special Assistant

Bureau of Land Management

U.S. Department of the Interior

alex_x_diera@ios.doi.gov

(O) 202-742-0951

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Wednesday, February 17, 2021 1:49 PM
To: Knodel, Marissa S <marissa_knodel@ios.doi.gov>; Scott, Janea A <janea_scott@ios.doi.gov>; Diera, Alexx A <alex_x_diera@ios.doi.gov>
Cc: Lefton, Amanda B <amanda_lefton@ios.doi.gov>
Subject: RE: Strawman draft agenda

I also do not have it on my calendar.

From: Knodel, Marissa S <marissa_knodel@ios.doi.gov>
Sent: Wednesday, February 17, 2021 1:49 PM
To: Scott, Janea A <janea_scott@ios.doi.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Diera, Alexx A <alex_x_diera@ios.doi.gov>
Cc: Lefton, Amanda B <amanda_lefton@ios.doi.gov>
Subject: RE: Strawman draft agenda

Thanks, Janea. Do we have a call in 10 minutes? If so, it's not on my calendar, and technically Amanda and I have a conflict, though I think I can skip the call if necessary.

From: Scott, Janea A <janea_scott@ios.doi.gov>
Sent: Wednesday, February 17, 2021 1:48 PM
To: Knodel, Marissa S <marissa_knodel@ios.doi.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Diera, Alexx A <alex_x_diera@ios.doi.gov>
Cc: Lefton, Amanda B <amanda_lefton@ios.doi.gov>
Subject: Strawman draft agenda

From: Scott, Janea A
Sent: Wednesday, February 17, 2021 10:13 AM
To: Knodel, Marissa S <marissa_knodel@ios.doi.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Diera, Alexx A <alex_x_diera@ios.doi.gov>
Cc: Lefton, Amanda B <amanda_lefton@ios.doi.gov>
Subject: If you have some spare time

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[TN229273_20190808T083731_Updated Meeting Schedule IEPR Lead Commissioner Workshop Climate.pdf](#)

Janea A. Scott (she/her)
Senior Counselor to ASLM
U.S. Department of the Interior
janea_scott@ios.doi.gov
202-742-0942

From: [Scott, Janea A](#)
To: [Knodel, Marissa S](#); [Sanchez, Alexandra L](#); [Diera, Alexx A](#)
Cc: [Lefton, Amanda B](#)
Subject: Strawman draft agenda
Date: Wednesday, February 17, 2021 1:47:50 PM
Attachments: [Implementing EO14008 Workshop Agenda DRAFT.docx](#)

From: Scott, Janea A
Sent: Wednesday, February 17, 2021 10:13 AM
To: Knodel, Marissa S <marissa_knodel@ios.doi.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Diera, Alexx A <alex_x_diera@ios.doi.gov>
Cc: Lefton, Amanda B <amanda_lefton@ios.doi.gov>
Subject: If you have some spare time

Here are a few examples of what I have in mind. For our 11am pacific call, I'm going to try and type up a quick initial agenda.

Link.

[2019 IEPR Workshops, Notices and Documents \(ca.gov\)](#)

Here's what one of the workshop notices looks like.

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And here's an agenda.

[TN229825 20190923T164225 Meeting Schedule - IEPR Workshop on Near-Zero Carbon Electricity .pdf](#)

[TN229273 20190808T083731 Updated Meeting Schedule IEPR Lead Commissioner Workshop Climate.pdf](#)

Janea A. Scott (she/her)
Senior Counselor to ASLM
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janea_scott@ios.doi.gov
202-742-0942

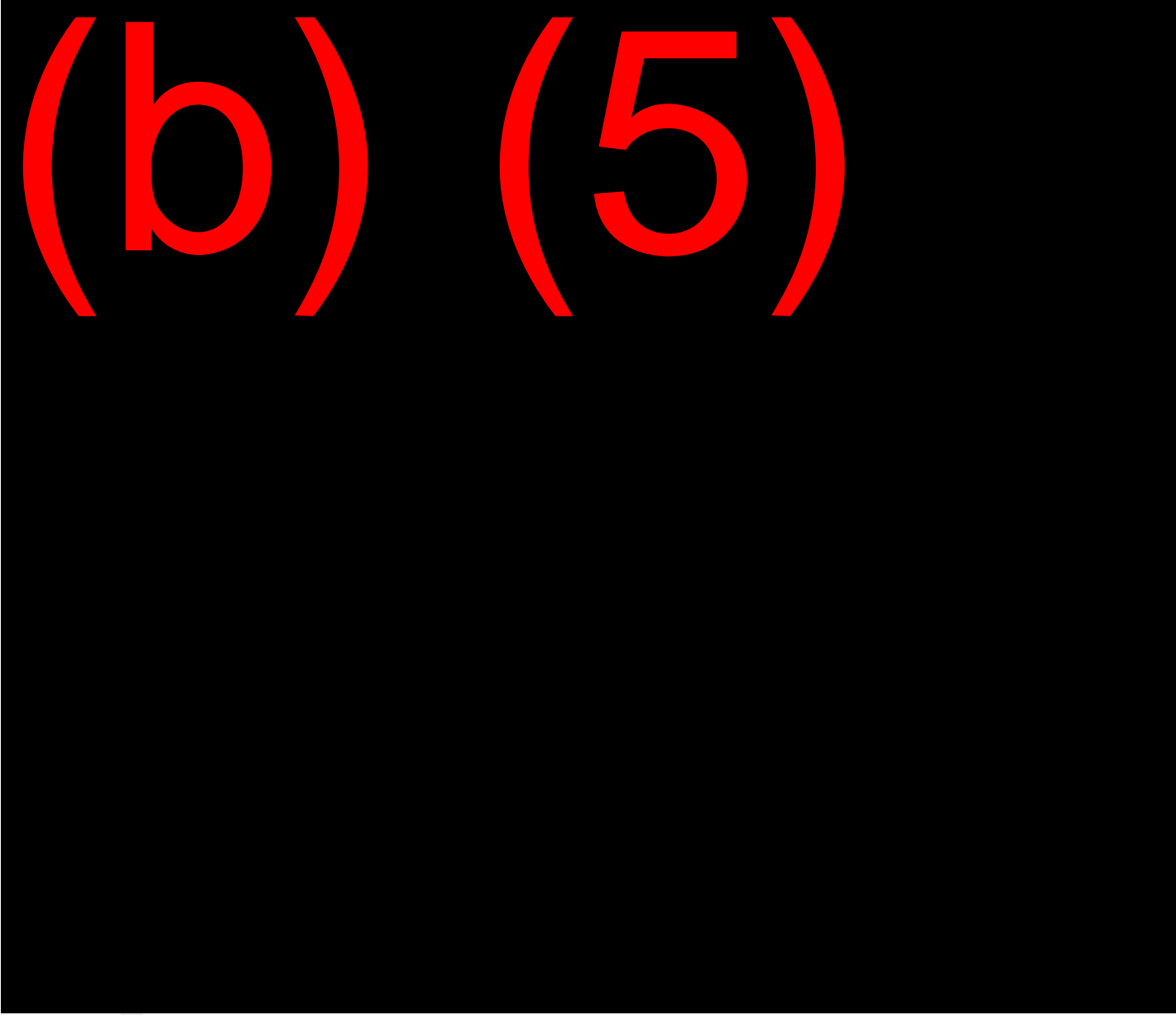
Implementing EO 14008
Draft Workshop Agenda
DATES

Part 1: Offshore Oil and Gas
(All Times Eastern)

(b) (5)

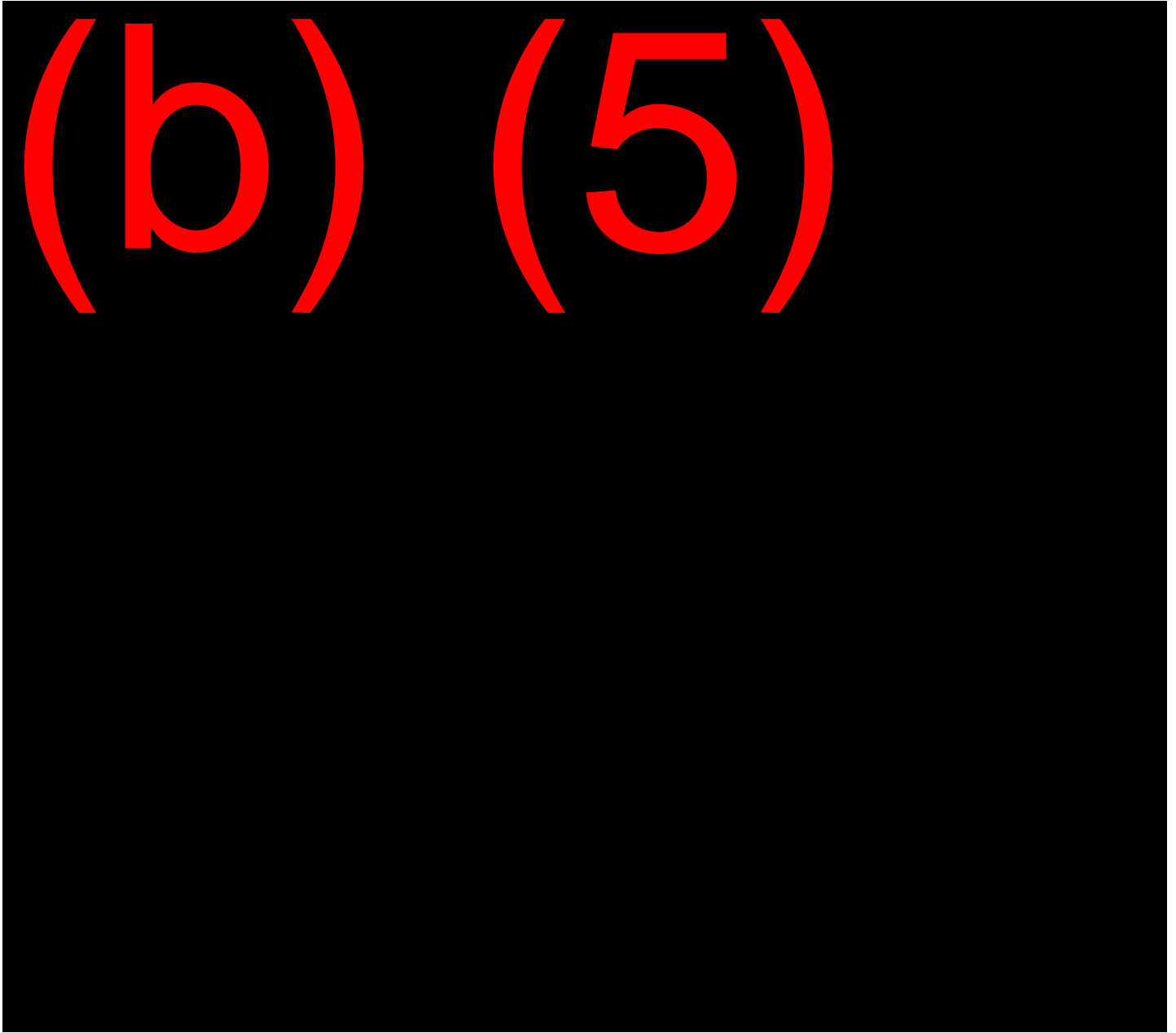
Part 2: Onshore Oil and Gas
(All Times Eastern)

(b) (5)



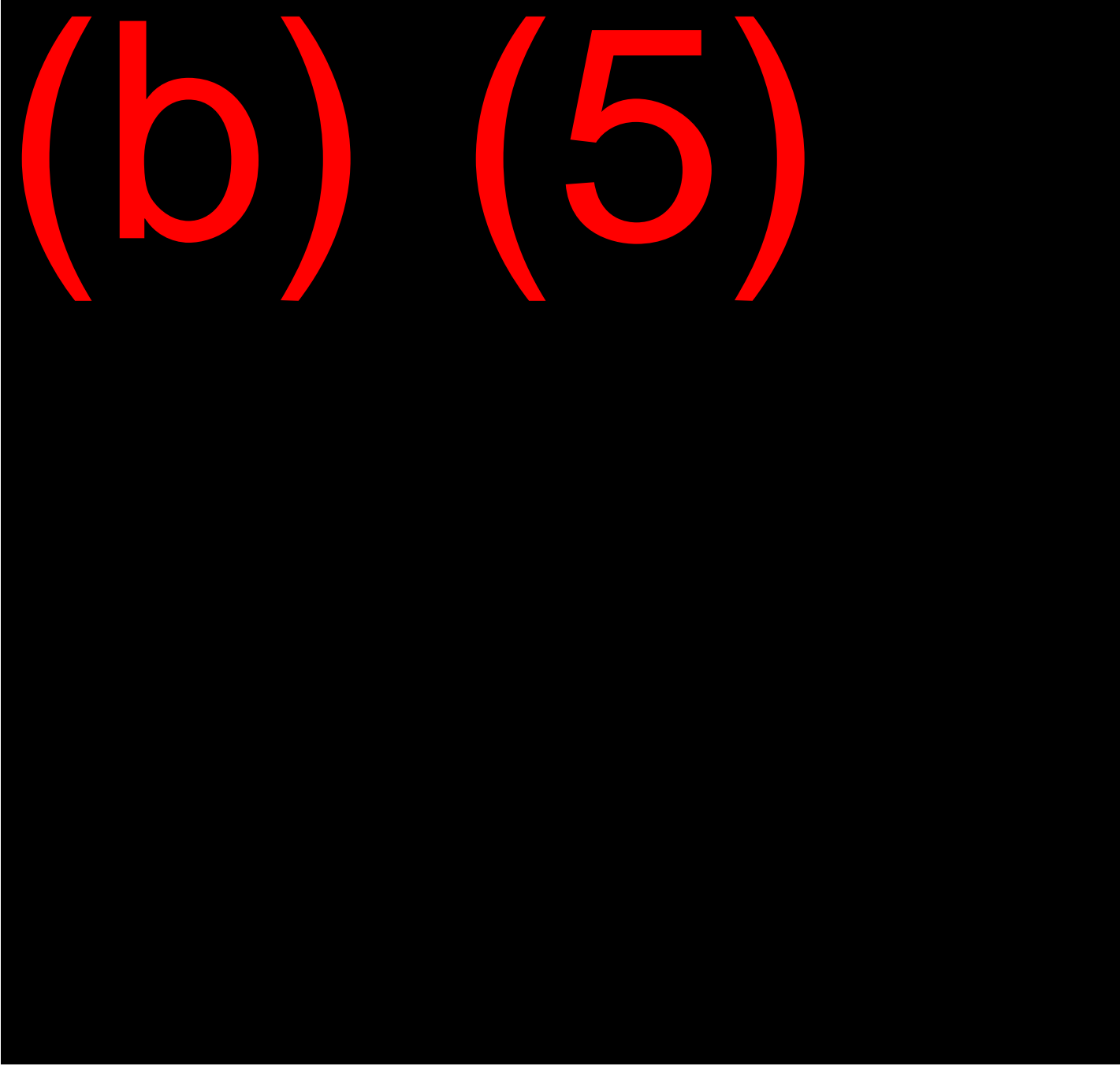
Part 3: Offshore Renewable Energy
(All Times Eastern)

(b) (5)



Part 4: Onshore Renewable Energy
(All Times Eastern)

(b) (5)



From: [Buckner, Shawn M](#)
To: [Daniel-Davis, Laura E](#); [Glomb, Steve J](#); [Sanchez, Alexandra L](#)
Subject: RE: EO review
Date: Tuesday, February 16, 2021 3:48:12 PM

Thank you Laura!

Shawn M. Buckner
Director
Office of Policy Analysis
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240
Mobile: (202) 669-1320

From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Tuesday, February 16, 2021 3:46 PM
To: Glomb, Steve J <Steve_Glomb@ios.doi.gov>; Buckner, Shawn M <shawn_buckner@ios.doi.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: EO review

Alex, linking you up here with Steve and Shawn from PMB's policy office to talk about reports, etc that may inform the EO review.

From: [Daniel-Davis, Laura E](#)
To: [Sanchez, Alexandra L](#)
Subject: Re: Clip on royalties
Date: Wednesday, February 3, 2021 10:45:15 AM

Great! We are still awaiting feedback on our report plan...

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Wednesday, February 3, 2021 9:30 AM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Subject: Clip on royalties

Just flagging this clip I saw this am, which will help inform the state of play report!

Washington Post: [How Biden may get oil companies to pay more to drill](#)

Dino Grandoni, February 2, 2021

For years, environmental advocates have argued taxpayers have gotten a raw deal. Petroleum producers, they say, pay too little for the privilege of drilling on federally controlled lands — under rates originally set in the 1920s. Now Biden's Interior Department may reconsider the royalty rate and other fees levied on oil and gas companies as the new administration halts auctions off drilling rights on federal lands.

Alexandra Sanchez
Special Assistant
Office of the Assistant Secretary - Land and Minerals Management
U.S. Department of the Interior

From: [Feldgus, Steven H](#)
To: [Sanchez, Alexandra L](#)
Subject: RE: [EXTERNAL] Comment on leasing ruling
Date: Tuesday, June 15, 2021 5:58:20 PM

Just happened, and the ruling affects both onshore and offshore.

(The “approved statement” is the less important part. I’ve sent the ruling to Nada and Amanda.)

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Tuesday, June 15, 2021 5:57 PM
To: Feldgus, Steven H <steve_feldgus@ios.doi.gov>
Subject: RE: [EXTERNAL] Comment on leasing ruling

Haven’t seen this come through...

From: Feldgus, Steven H <steve_feldgus@ios.doi.gov>
Sent: Tuesday, June 15, 2021 3:55 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: FW: [EXTERNAL] Comment on leasing ruling

From: Roberts, Lawrence S <lawrence_s_roberts@ios.doi.gov>
Sent: Tuesday, June 15, 2021 5:51 PM
To: Feldgus, Steven H <steve_feldgus@ios.doi.gov>
Subject: Fwd: [EXTERNAL] Comment on leasing ruling

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From: Schwartz, Melissa A <melissa_schwartz@ios.doi.gov>
Sent: Tuesday, June 15, 2021 5:49:48 PM
To: Anderson, Robert T <Robert.Anderson@sol.doi.gov>; Roberts, Lawrence S <lawrence_s_roberts@ios.doi.gov>; Kelly, Katherine P <Kate_Kelly@ios.doi.gov>
Subject: FW: [EXTERNAL] Comment on leasing ruling

Deploying our approved statement by 6pm unless you have objections

From: Alex Guillen <aguillen@politico.com>
Sent: Tuesday, June 15, 2021 5:48 PM
To: Interior Press <interior_press@ios.doi.gov>
Subject: [EXTERNAL] Comment on leasing ruling

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello, does Interior have any comment on the ruling this afternoon from Judge Doughty in Louisiana blocking President Biden's executive order pausing oil and gas leasing?

Thank you,

Alex Guillen | Energy Reporter | **POLITICO**PRO

1000 Wilson Boulevard, 8th Floor | Arlington, VA 22209

Phone: 703.341.4619

Email: aguillen@politico.com | Twitter: [@alexsguillen](https://twitter.com/alexsguillen) | Website: www.POLITICOPro.com

From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#); [Feldgus, Steven H](#)
Subject: FW: [EXTERNAL] Economic Analysis of the Federal Oil and Gas Leasing Moratorium
Date: Monday, June 28, 2021 1:39:19 AM
Attachments: [CEI Economic Comments to DOI on Federal Oil and Gas Leasing Moratorium.pdf](#)

I'm not sure if they were making any effort to get these in during our requested timeframe after the forum but thought they might be of interest to you, too.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Evan Hjerpe <evan@conservationecon.org>
Sent: Wednesday, June 9, 2021 10:46 AM
To: Culver, Nada L <nculver@blm.gov>; Iddavis@blm.gov; Diera, Alexx A <adiera@blm.gov>
Subject: [EXTERNAL] Economic Analysis of the Federal Oil and Gas Leasing Moratorium

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Nada, Laura, and Alexx,

The Conservation Economics Institute (CEI) is submitting economic comments to the US Department of Interior (USDOI) that detail our recent economic research investigating the federal oil and gas leasing moratorium.

With limited economic information available with which to assess the economic implications of a leasing moratorium on federal lands, CEI, with financial support from the Natural Resources Defense Council, would like to share this new research with the USDOI and the BLM. Our research will be presented fully in a report to be released later this summer.

If you have any questions or would like any follow up, please do not hesitate to reach out to me.

Best,
Evan

--

Evan E. Hjerpe, Ph.D.
Executive Director

Conservation Economics Institute

www.conservationecon.org

208-869-1675



*Conservation
Economics
Institute*

Economic Effects of a Moratorium on Oil and Gas Leasing on Federal Lands

June 9th, 2021

Department of the Interior
1849 C Street, N.W.
Washington DC 20240

From: Conservation Economics Institute

RE: Federal Oil and Gas Leasing Moratorium

To whom it may concern, the Conservation Economics Institute (CEI) is submitting comments to the US Department of Interior (USDOL) that detail our recent economic research investigating the federal oil and gas leasing moratorium. With limited economic information available with which to assess the economic implications of a leasing moratorium on federal lands, CEI, with financial support from the Natural Resources Defense Council, would like to share this new research with the USDOL. Our research will be presented fully in a report to be released later this summer.

CEI is a network of Ph.D. resource economists who provide independent, expert economic analysis on land management, sustainable development, and policy alternatives. These comments were authored by CEI economists Evan Hjerpe, Gwen Aldrich, Pete Morton, and Michelle Haefele, with Leah Dunn providing spatial analysis.

Executive Summary

The moratorium on federal oil and gas leasing was one of the first Executive Orders issued by the Biden Administration in January of 2021. The leasing moratorium is a critical component of sweeping policy changes aimed at helping solve our climate crisis and results in federal lands being placed at the forefront of a domestic energy transition. The leasing moratorium comes at an opportune time, as private production of oil and gas continues to escalate while economic demand for federal oil and gas wanes.

We present our research in the form of official comments on the leasing moratorium section (208) of the Executive Order on Tackling the Climate Crisis at Home and Abroad. Our research focuses strictly on the onshore portion of federal oil and gas leasing reform. We hope that the USDOl and the Biden Administration will utilize our economic findings in crafting additional climate change policy on federal lands.

In these comments, we present our examination of the distributional effects, in terms of industry output and employment, that may occur from the moratorium, looking at national and regional economic impacts. For regional economic impacts, we focus on five Intermountain West states that dominate federal production of onshore oil and gas (CO, MT, NM, UT, and WY). We detail the stockpiled leases and permits in these states and estimate years of future drilling opportunities based on current stockpiled nonproducing acres. We also provide an overview of national benefits and costs of the leasing moratorium along with a longer-term economic perspective on how rural Western communities and the USDOl can facilitate an economic and energy transition that is socially just, economically efficient, and sustainable.

Upon a thorough economic investigation of the moratorium on federal oil and gas leasing, we have found that national economic impacts of a leasing moratorium are negligible, as federal domestic production of oil and gas, and associated employment, will not be materially affected by the moratorium in the short-term (1st year of the moratorium). Nationally, we find that:

- Federal onshore oil and gas production constitutes a minor component of total domestic production--6% and 8%, respectively. Notably, the moratorium does not curtail drilling or production on federal lands, just new leasing.
- There is no correlation between federally leased acres and oil and gas employment.
- Onshore federal oil and gas leases issued have been steadily declining for the last 20 years, under different Administrations, indicating declining economic demand for federal leases and that remaining public lands have low potential for oil and gas development.
- There are greater than 14 million acres of nonproducing leases on federal lands, or more than 50% of all onshore leased federal land, that can support 75 years of future drilling opportunities on federal lands without any new leases.
- If the moratorium is extended and federal production eventually becomes constrained, we anticipate that regional oil and gas investments will be fully shifted to private and state lands.

For regional economic impacts, we have also found impacts to be negligible in the short-term, as the most resource reliant states have ample stockpiles of leases and permits to easily continue the status quo in terms of new drilling on federal lands. Regionally, we find that:

- Only 15 counties out of some 3,000 total domestic counties had greater than 100 federal oil and gas lease sales from 2016-2020. More than half these counties (9) were in Wyoming.
- The bulk of federal onshore oil and gas production happens in five Intermountain West states: Colorado, Montana, New Mexico, Utah, and Wyoming; 86% of federal onshore oil and 95% of federal onshore natural gas was produced in these five states during 2019.
- Wyoming is the most dependent state on federal oil and gas; during 2019 nearly 50% of all oil and more than 80% of all gas produced in Wyoming was extracted from public lands.
- However, Wyoming has ample stockpiled nonproducing acres and permits and an estimated 67 years of drilling opportunities on federal lands.
- New Mexico is also substantially dependent on federal oil and gas; between 50 and 60% of both oil and gas produced during 2019 was from public lands.
- New Mexico has fewer nonproducing acres than all other IMW states, but has stockpiled numerous recent leases, permits, and lease acreage, resulting in at least 11 years of drilling opportunities on federal lands.

In terms of national economic efficiency analysis and cost-benefit analysis, we found that the benefits of a federal leasing moratorium outweigh the costs by at least a ratio of 40:1. Our economic efficiency analysis finds that:

- Benefits of the moratorium include conservation benefits, time to collect information and reform federal oil and gas policies, and as a catalyst for a national course correction on energy production.
- The moratorium provides temporary protection to likely more than one million acres of public lands in the first year, resulting in at least \$3 billion of public willingness-to-pay for conservation.
- The Moratorium sends a signal to the marketplace and to companies that the Administration is serious about transitioning our economy and energy production on federal lands.
- The costs of the Moratorium are represented by lost lease sale and bonus bid revenue.
- If we assume a similar amount of total receipts from competitive federal oil and gas sales as generated in FY 2020, a total of \$78 million may be lost in the first year of the moratorium.
- Half of total receipts go back to the states where the leases were sold. 60% of FY 2020 total receipts from lease sales were from the state of New Mexico.
- However, total receipts are used, in part, to pay for administration of the federal lease sale program. Under a temporary leasing moratorium, these receipts needed for administrative salaries and fees are no longer needed and thus will not represent a net cost.

- Federal lease sale receipts are a small portion of overall royalty and tax revenue from oil and gas production. Losses in lease sale receipts may be offset by increased royalties, as the moratorium incentivizes production on currently nonproducing leases on federal lands.
- Finally, the costs of the moratorium in terms of lease sale receipts (approximately \$78 million) are dwarfed by the benefits of temporary protection afforded to more than a million acres of public lands (approximately \$3 billion).

Taking a long-term perspective that envisions an extended leasing moratorium and eventual decreases in federal production of oil and gas, we find multiple transition opportunities for rural regions with large portions of federal lands. Specifically, we find that:

- Rural areas in the Intermountain West have already undergone a complete economic restructuring from extractive industries and primary manufacturing to service-oriented economies, easing the burden of changing job opportunities on public lands.
- In the rural American West, public lands with greater protection were positively associated with greater migration rates while oil and gas dependent counties were negatively associated with migration rates from 1980-2010. Conservation attracts people and businesses; intensive oil and gas development repels people and businesses over the long run.
- Less than 2.5% of all employment in the five IMW states comes from mining, which includes oil and gas sectors. On the other hand, over 50% of all employment in these states comes from service industries.
- The COVID-19 pandemic has intensified the shift from primary extraction and manufacturing to service industries and amenity development in the rural West.
- Transition jobs will be necessary to dampen any future job displacement from an extended leasing moratorium. Jobs that focus on cleaning legacy and existing wells, while incorporating comparable skills as those found in oil and gas work, will represent win-win scenarios.
- With over three million estimated abandoned and orphaned wells in the US, there is a tremendous opportunity to reduce emissions and create high paying labor jobs through plugging and reclaiming abandoned wells.
- Methane capture on existing oil and gas production facilities, through Leak Detection and Repair (LDAR), offers upside for creating jobs, reducing emissions, and getting more gas to markets.
- Finally, siting renewable energy projects on and near federal lands that were used for oil and gas production can offer clean energy production and jobs in affected regions.

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1. Introduction

Over the last century, fossil fuels have played a critical role in modernizing and industrializing America. Recognizing the importance of fossil fuels to the U.S. economy, the Bureau of Land Management (BLM) has leased tens of millions of acres of public land and issued tens of thousands of drilling permits to the oil and gas industry. Unfortunately, the large scale of leased land and the fast pace at which drilling permits were approved has come at the expense of other agency programs and our environment. Scientists estimate that fossil fuels produced on Federal lands account for 23.7 and 7.3 percent of national emissions for carbon-dioxide and methane, respectively.¹

Elected officials in Congress have also encouraged oil and gas production on public land by granting tax subsidies and exemptions from environmental laws. However, development of fossil fuels is polluting our air and water, fragmenting bird and wildlife habitat, damaging public health, and causing our climate to change. The emphasis and preferential treatment of oil and gas development by Congress and the BLM must be phased out due to the overwhelming public costs of climate change.

As part of his climate policy, President Biden has issued a moratorium² (hereafter Moratorium) on new oil and gas leasing on public lands to allow time for a comprehensive review of leasing and permitting policies. Public lands provide an opportunity for the federal government to implement a non-market strategy for addressing the market failures that brought us climate change. Biden's leasing Moratorium, by regulating the pace and scale of leasing, begins the necessary phasing down of future oil and gas production from federal land. The leasing Moratorium provides a point in time to critically examine the economic implications of the federal oil and gas leasing program and plan for an efficient and just transition to cleaner energy production.

Given the importance of the leasing Moratorium, the Conservation Economics Institute is compelled to present the Department of Interior research that has been conducted on the economic effects of a temporary Moratorium. Our research fully investigates the national and regional effects of the Moratorium. Specifically, we analyze the potential for future drilling opportunities on federal lands in Intermountain West (IMW) based on stockpiled leases to assess short term economic impacts. We also detail the national costs and benefits associated with the Moratorium.

¹ Merrill, M.D., Sleeter, B.M., Freeman, P.A., Liu, J., Warwick, P.D., and Reed, B.C., 2018, Federal lands greenhouse gas emissions and sequestration in the United States—Estimates for 2005–14: U.S. Geological Survey Scientific Investigations Report 2018–5131, 31 p., <https://doi.org/10.3133/sir20185131>.

² Executive Order on Tackling the Climate Crisis at Home and Abroad at: <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>; Moratorium does not include Tribal lands.

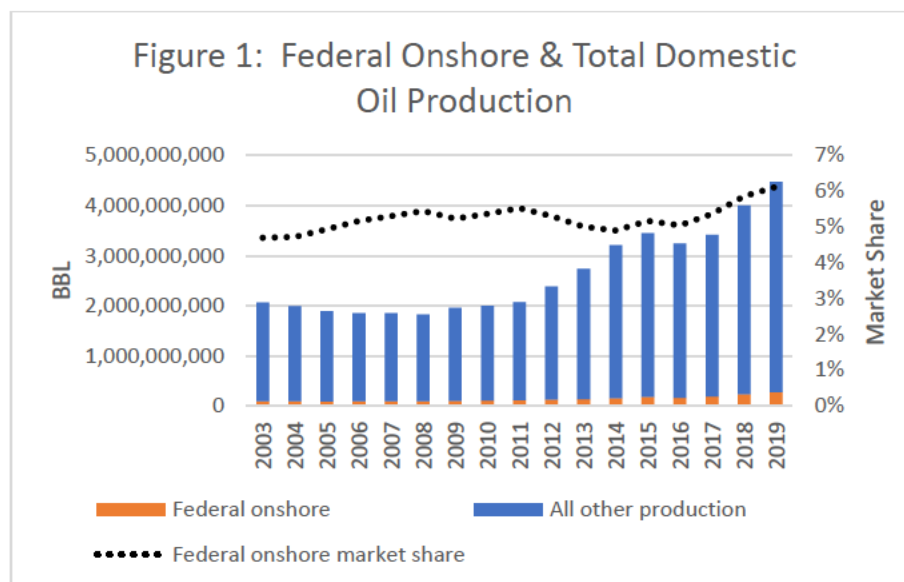
In these comments, we have organized and analyzed economic effects as would be done under formal economic reviews of proposed alternatives for land management planning on federal lands. We analyze distributional effects of the leasing Moratorium to determine if there will be short term economic impacts in oil and gas production and employment both nationally and regionally. We then conduct economic efficiency analysis of the leasing Moratorium to better understand the benefits and costs of this policy decision. The final component of our comments is an analysis of what a longer-term energy transition on public lands can look like for regional economies in the Intermountain West (IMW) and how targeted stimulus projects can reduce emissions while providing job opportunities for potentially displaced workers and distressed communities.

2. National Distributional Effects of the Moratorium

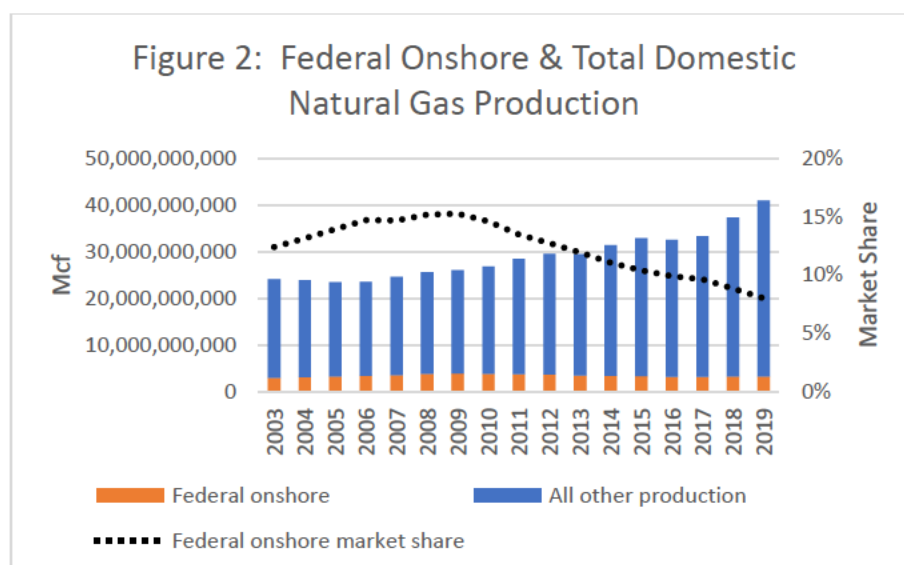
We start our economic investigation by examining macro distributional effects for the nation regarding oil and gas production and employment. The primary component of distributional effects, as typically investigated in the NEPA process for public lands rulemaking, is economic impact analysis. Economic impact analysis measures the resulting market impacts, such as changes to oil and gas industry output and employment, associated with a change in final demand resulting from a new land management policy. Economic impacts are part of distributional effects because they represent shifts in regional wealth that ultimately balance out nationally, where the additional investments and jobs in one region come at the expense of another region.

2.1 National Employments Impacts from the Moratorium

Federal onshore oil and gas production constitutes a minor component of total domestic production--6% and 8%, respectively (see Figures 1 and 2). The majority of federal onshore oil and gas production occurs in five IMW states (CO, MT, NM, UT, and WY). With such a limited role in overall domestic production, the Moratorium is not expected to have a material impact on the industry or production levels.



Data Source: U.S. Department of Energy, Energy Information Administration; U.S. Department of the Interior, Office of Natural Resources Revenue



Data Source: U.S. Department of Energy, Energy Information Administration; U.S. Department of the Interior, Office of Natural Resources Revenue

Given the minor role of federal onshore oil and gas among total domestic oil and gas production, we expect minimal short-term impacts to overall U.S. production of oil and gas and associated employment. If the Moratorium becomes permanent, we could expect that any small decreases in total production that might occur in a few years to be largely offset, or absorbed, by increased production on state and private lands. That is, oil and gas investments that would have gone towards leasing on federal lands will be shifted to greater investments on state and private lands.

Further evidence supporting a lack of short-term economic impacts resulting from the Moratorium comes from correlation analysis of oil and gas industry employment levels and federal leasing. We examined correlations between jobs and federally leased acres, well spuds, oil and gas production levels, the price of oil (West Texas Intermediate), and the price of gas (Henry Hub).³ The price of oil is strongly correlated with job levels; all other variables were found to have at most moderate correlation with industry employment (Table 1). The amount of federally leased acres shows no correlation with oil and gas employment, indicating that a brief pause in federal leasing will have zero effect on employment levels.

Table 1: Oil & Gas Employment Correlation Coefficients

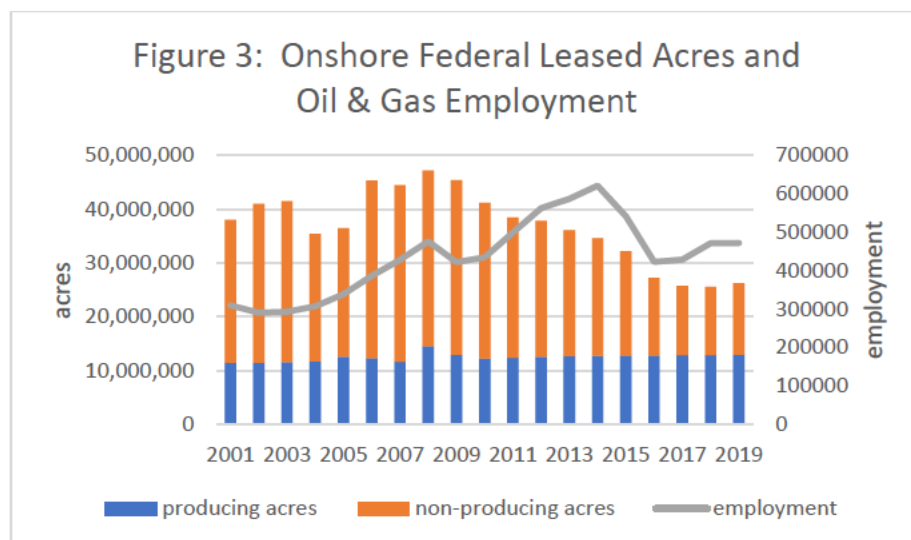
Variable	Correlation Coefficient	Significance
Leased acres	0.222	
Producing leased acres	0.551	**
Well spuds	0.106	
US oil production	0.438	*
US gas production	0.554	**
Price of oil	0.789	****
Price of gas	0.311	

*, **, ***, and **** denote significance levels of 0.10, 0.05, 0.01, and 0.001.

Figure 3 depicts federal onshore leased acres (producing and non-producing) and industry employment levels. The quantity of nonproducing acres⁴ (which logically cannot be driving employment levels) has fluctuated over the last 20 years, while producing acres has held relatively constant (and thus cannot be driving fluctuating employment levels). Even before the COVID-19 pandemic, employment and the price of oil (the primary driver of industry employment) were in a restriction period, making this an optimal time to temporarily pause and reassess federal leasing.

³ We use QCEW data from the three main sectors related to the primary extraction and production of oil and gas for the following NAICS codes: 211 (Oil and gas extraction), 213111 (Drilling oil and gas wells), and 213112 (Support activities for oil and gas operations).

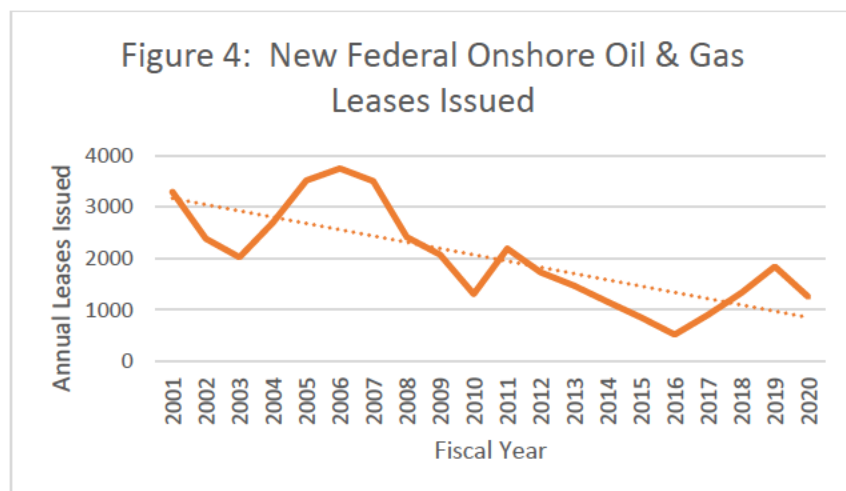
⁴ Lease data published by the BLM details the number of federal oil and gas leases and associated acreage, as well as the number of producing leases and acreage. The difference between the two is non-producing leases and acreage.



Data Source: U.S. Department of the Interior, Bureau of Land Management. U.S. Department of Labor, Bureau of Labor Statistics. Employment numbers are QCEW data for the three main sectors related to the primary extraction and production of oil & gas: NAICS codes 211 (Oil and gas extraction), 213111 (Drilling oil and gas wells), and 213112 (Support activities for oil and gas operations).

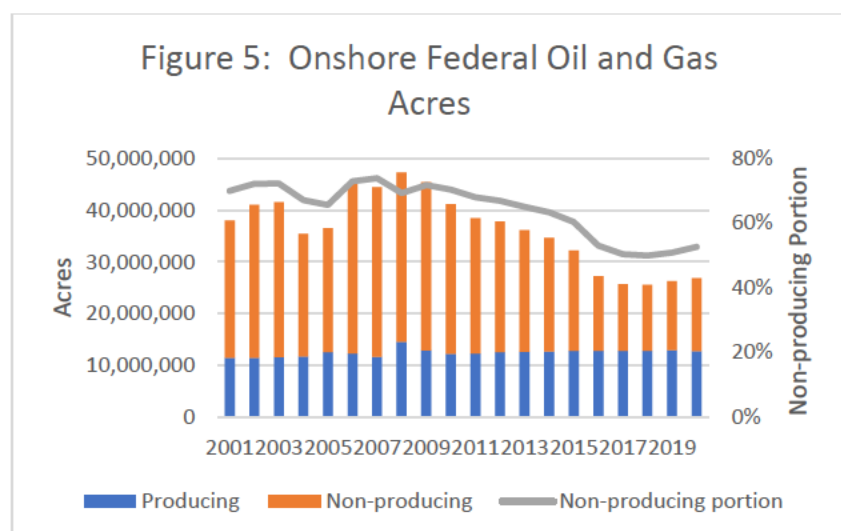
2.2 Declining Economic Demand for Federal Oil and Gas Leases

Figure 4 shows trends in new federal onshore leases issued during the last 20 years. The trendline indicates a steady decline in demand for new leases, despite bumps under two Republican Administrations (Presidents Bush and Trump). The Shale Boom of the early 2010s is receding, and the remaining federal lands with technically recoverable resources are becoming less and less economic. This is the standard process with extracting natural resources – each subsequent entry becomes less profitable (though technological advances like fracking can partially reset the market). The surplus leasing that occurred under the Trump Administration (FY 2017—FY 2019) is indicative of stockpiling by the industry and will allow for minimal short term economic harm from the Moratorium.



Data Source: U.S. Department of the Interior, Bureau of Land Management

Nationally, the stock of producing acres has held relatively constant over the last 20 years. The decline in demand for leases has thus been concurrent with a decline in non-producing acres (Figure 5). Despite this decline there are still more federal lands leased than drilled and producing; as of FY 2020 yearend, the industry had stockpiled approximately 14,000 leases encompassing more than 14 million acres – more than 50% of all onshore leased federal land.⁵ These stockpiled non-producing areas have yet to be developed and provide many years of future drilling opportunities.



Data Source: U.S. Department of the Interior, Bureau of Land Management

3. Regional Economic Impacts of the Moratorium

While the national economic impacts of a leasing Moratorium appear minimal, the bulk of federal onshore oil and gas production happens in five IMW states: Colorado, Montana, New Mexico, Utah, and Wyoming; 86% of federal onshore oil and 95% of federal onshore natural gas was produced in these five IMW states during 2019. Thus, our regional economic impact analysis of the Moratorium focuses on these five states and their counties. While modest effects of the Moratorium may be felt in places like the Dakotas, Texas, California, and parts of the South, the IMW states have the greatest overlap in public lands and large oil and gas fields (excluding Alaska which may see greater effects).

Over the last two decades far more federal oil and gas leases have been sold in Wyoming than in any other Intermountain West state. Figure 6 portrays the spatial distribution of federal onshore oil

⁵ A large number of federal leases were stockpiled by the oil and gas companies near the end of the Trump presidency, and the BLM is still working to process and issue these leases. As the BLM works through the backlogged lease sales, leases have been issued during the ensuing months, despite the Moratorium. The non-producing leases and acres values used in our analyses reflect the sum of FY2020 non-producing leases and acres (as published by the BLM) plus all additional leases/acres issued between 10/1/2020 and 5/14/2021.

and gas lease sales in the IMW between 2016-2020, when more than 2,500 leases were sold in Wyoming (more than in the other four IMW states combined).

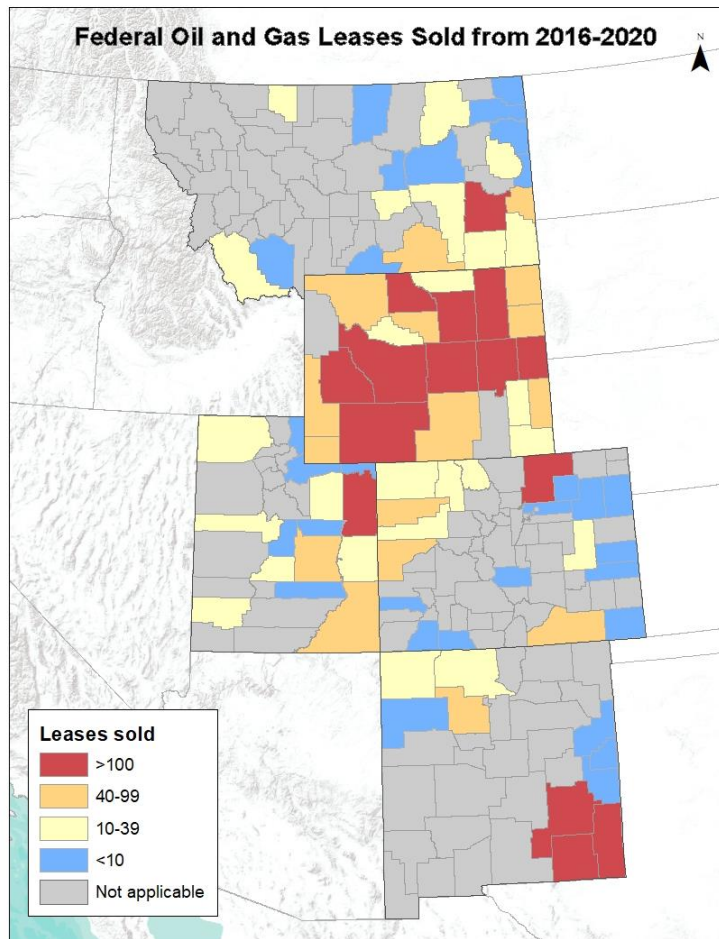
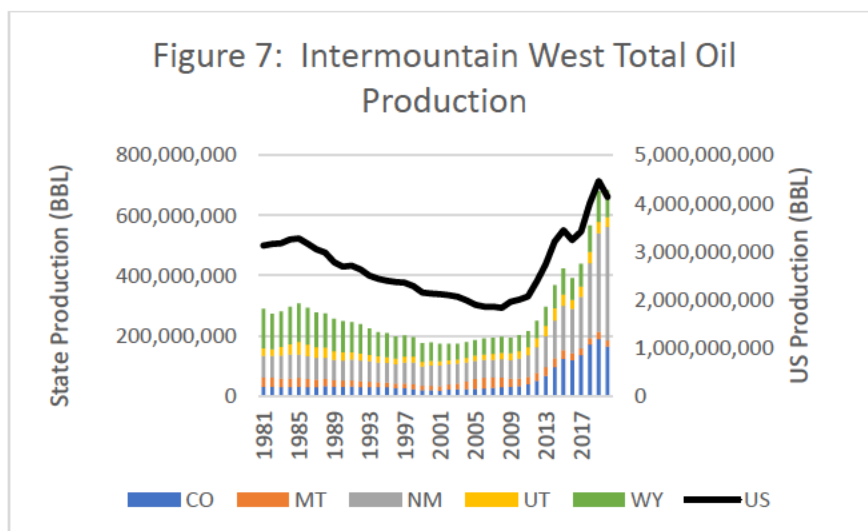
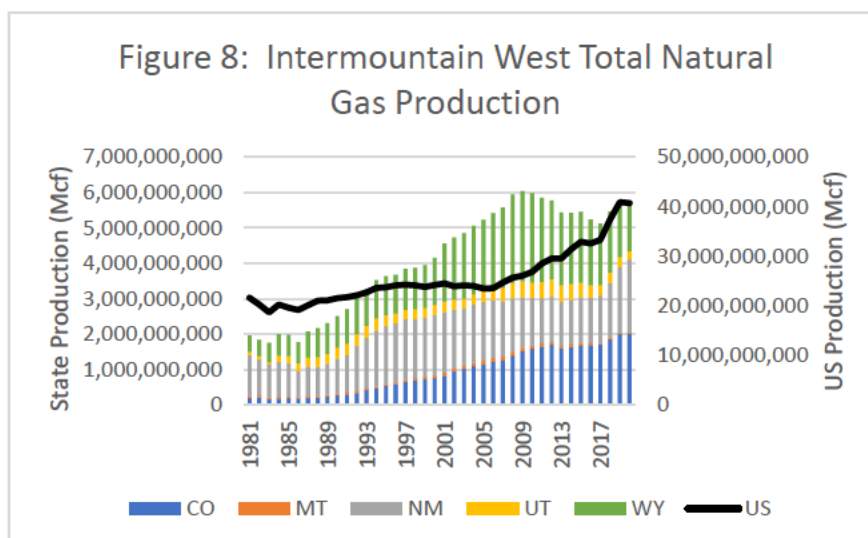


Figure 6: Federal Oil and Gas Leases Sold by County 2016-2020

The relative importance of oil production in the IMW has grown in recent years; in 2003 total IMW oil production (from federal and private land) accounted for less than 10% of all U.S. production, but by 2020 grew to 17% of total U.S. production (Figure 7). During this same time the relative importance of total IMW natural gas production (federal and private) declined from 20% to 14% of total U.S. production (Figure 8). Thus, the Intermountain West region is responsible for producing approximately 15% of all U.S. oil and natural gas. In 2020 New Mexico and Colorado were the two largest oil and natural gas producers in the region, and Wyoming was third largest. Montana and Utah are relatively small producers in comparison to the other three IMW states.



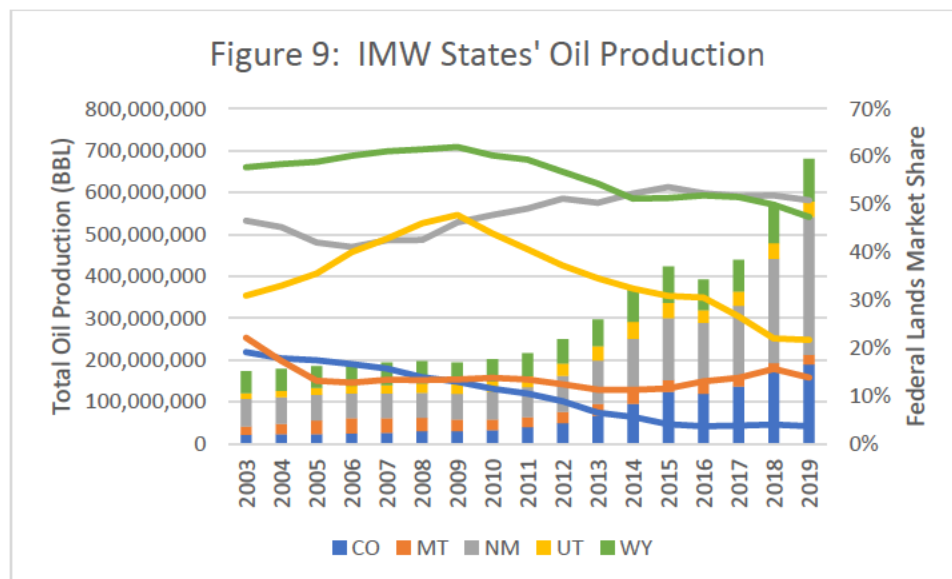
Data Source: U.S. Department of Energy, Energy Information Administration



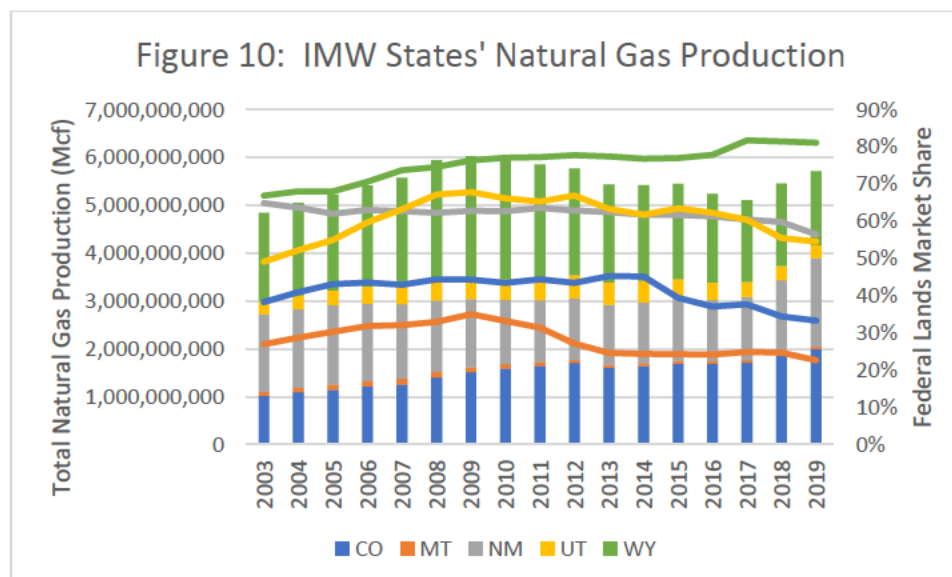
Data Source: U.S. Department of Energy, Energy Information Administration

There is considerable variation in the relative importance of oil and gas extraction from federal lands to the IMW states' economies, as shown in Figures 9 and 10, which depict each state's total oil and gas production and the portion derived from federal lands. Oil and gas extracted from federal lands constitute a particularly notable portion of total extraction for both New Mexico and Wyoming. During 2019 nearly 50% of all oil and more than 80% of all gas produced in Wyoming was extracted from federal land. In New Mexico between 50 and 60% of both oil and gas produced during 2019 was produced from federal land. The particularly heavy reliance of NM and WY on federal land for oil and gas production and tax revenues suggests the Moratorium, if extended beyond 2021, may have a more significant impact on the NM and WY economies than on those of

other IMW states. In contrast, although Colorado's oil and gas production levels have increased notably since 2003, the portion derived from federal land has declined, indicating an increased reliance on production from privately owned land.



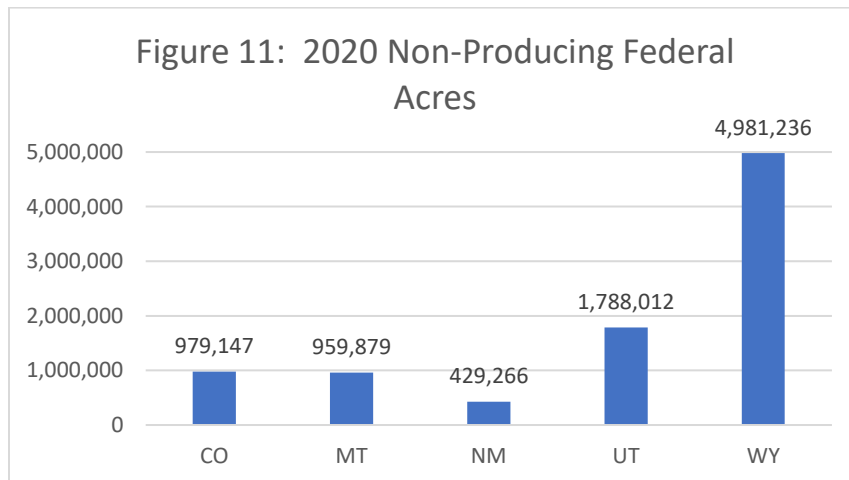
Data Source: U.S. Department of Energy, Energy Information Administration; U.S. Department of the Interior, Office of Natural Resources Revenue



Data Source: U.S. Department of Energy, Energy Information Administration; U.S. Department of the Interior, Office of Natural Resources Revenue

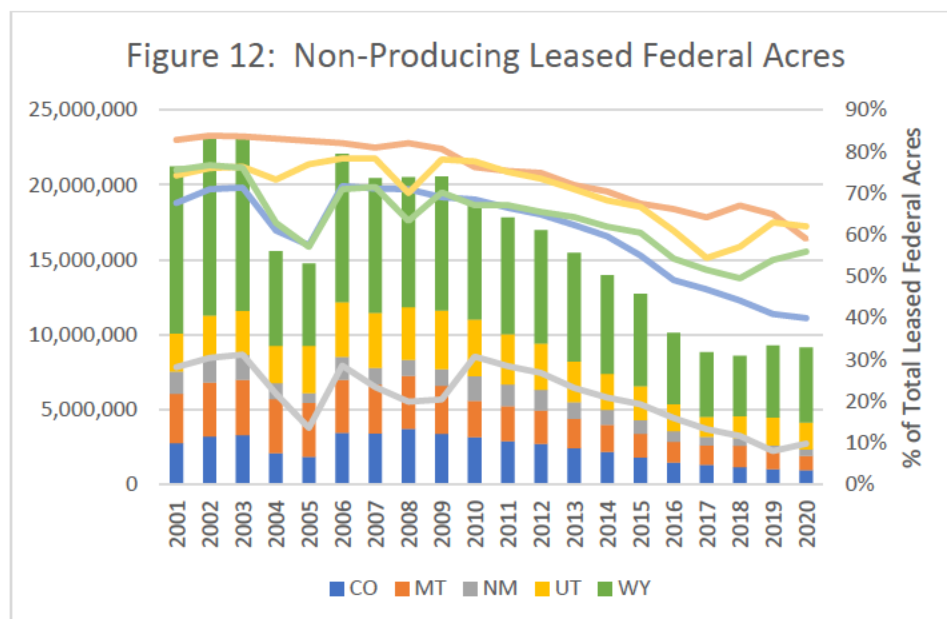
3.1 Stockpiled Nonproducing Leases on IMW Federal Lands

In 2020 nearly two-thirds of the approximately 14 million non-producing federal onshore acres stockpiled by the industry were in the five IMW states. Far more acres have been stockpiled by the industry in Wyoming than any other IMW state, and far fewer in New Mexico. This, in conjunction with New Mexico's heavy reliance of federal lands for oil and gas production, indicates the Moratorium may have a more significant impact on New Mexico's economy than on other states.



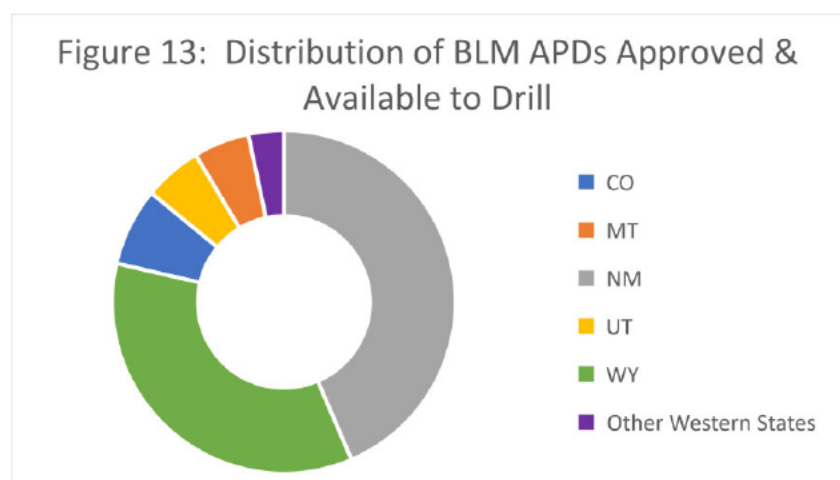
Data Source: U.S. Department of the Interior, Bureau of Land Management

Mirroring the national trend, non-producing federal acreage and its relative importance is declining in each state. These trends are indicative of the industry's turn toward private land. However, despite the decline in non-producing acres, in nearly all IMW states roughly 40% to 60% of leased acres are currently non-producing and thus available for future oil and gas development and production. In New Mexico, however, nearly all leased public lands are already developed and producing, leaving only 10% of leased public land available for future oil and gas development and production.



Data Source: U.S. Department of the Interior, Bureau of Land Management

In addition to amassing a stockpile of leases, oil and gas companies have amassed a stockpile of APDs (applications for permits to drill) that are approved and available for drilling. More than 7,500 approved and unused APDs are available for use in the West, distributed as depicted in Figure 13.⁶ Nearly 80% of the stockpiled APDs are for drilling in New Mexico and Wyoming. With undeveloped leased acreage and drilling permits in hand, the oil and gas industry can continue drilling new wells, producing oil and gas, and providing employment from federal lands.



Data Source: U.S. Department of the Interior, Bureau of Land Management

⁶ Source: BLM's January 31, 2021 APD Status Report.

3.2 Future Federal Onshore Drilling Opportunities

To estimate the years of drilling opportunities provided by the industry's stockpile of federal non-producing leases and acres we first estimate how many non-producing leases expire and then estimate the years of drilling opportunities provided by the unexpired leases. This requires imposing assumptions regarding a) the age of non-producing leases, drilling intensity, well placement (whether wells are drilled on non-producing or producing leases), and well density.

Lease age is important to consider, as federal oil and gas leases have a 10-year primary term and expire after ten years unless a) qualifying drilling is in progress, b) the lease has a well capable of producing in paying quantities, or c) the lease receives allocation of production from an off-lease well. For our purposes we assume if industry begins the process of drilling a well on a non-producing lease this serves to preserve the lease and the lease does not expire. For each region (state or nation) we assume the FY 2020 yearend stockpile of federal non-producing leases (NPL_{2020}) are evenly distributed between 0 and 9 years of age, and thus one-tenth of NPL_{2020} will expire each year between 2021 and 2030 unless the industry opts to spud wells on the non-producing leases to preserve them.⁷

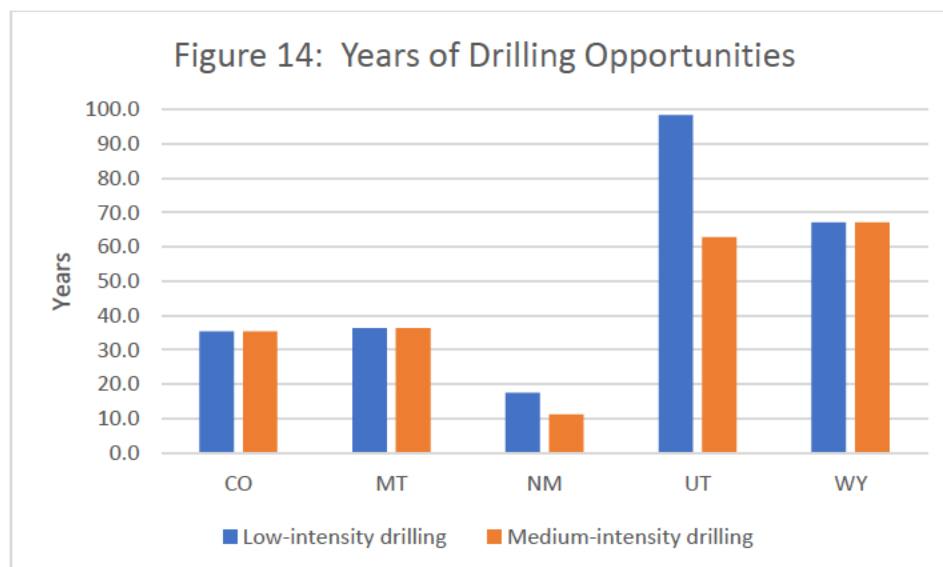
Historical well spud data is used to estimate low- and moderate-intensity drilling rates for the U.S. and each IMW state. For the U.S., low-intensity drilling occurred 2016-2020 and moderate-intensity drilling occurred 2009-2014. Because drilling activity is not uniform across the country, different years were used to calculate low- and moderate-drilling intensity for some states.⁸ Because well spuds will only preserve NPL_{2020} if drilled on a non-producing lease, we assume half of new well spuds are drilled on non-producing leases (the other half of new well spuds are drilled on producing leases). Within these constraints we assume industry acts to preserve as many leases as possible, spudding wells on the oldest non-producing leases first. See **Appendix A** for full methods and formulas used to determine years of drilling opportunity.

This approach suggests federal onshore leases stockpiled by the industry nationwide will yield approximately 75 years of drilling opportunities. State-level results are presented in Figure 14. Differences in preserved leases/acres and spatial variation in drilling intensity and average well density cause significant variation between states. With notably fewer stockpiled public lands leases and higher drilling rates than most other IMW states, New Mexico has far fewer years of drilling opportunities (YODO) – between 11 and 18 years. Wyoming has far more non-producing acres than other IMW states, and thus even with drilling rates similar to, or surpassing those of NM, Wyoming has an estimated 67 years of drilling opportunities. Montana and Colorado have

⁷ As noted earlier the NPL_{2020} values used in our calculations reflect the sum of FY2020 yearend non-producing leases (as published by the BLM) plus all additional leases issued between 10/1/2020 and 5/14/2021.

⁸ New Mexico's low-intensity drilling occurred between 2015 and 2018, while moderate-intensity drilling was from the same as for the U.S., 2009-2014. Colorado's low-intensity drilling years were 2015-2017, and moderate-intensity drilling occurred between 2012 and 2014.

similar *NPA*₂₀₂₀ values and similar YODO values, despite the majority of *NPA*₂₀₂₀ expiring in MT but little expiring in CO. The similar YODO values result from notably lower drilling rates in MT.



Data Source: CEI calculations

In summary, Wyoming and New Mexico are more dependent on federal oil and gas than other IMW states. In Wyoming the industry has stockpiled sizeable quantities of federal oil and gas leases and drilling permits, resulting in nearly 70 years of drilling opportunities. The excessive speculative stockpiling undertaken by the industry in Wyoming is more than sufficient to obviate any impacts from the temporary Moratorium on Wyoming's economy. Industry has fewer non-producing federal leases and acres available for future drilling and development in New Mexico; most NM federal leases have been put into production. Yet there is still ample supply of non-producing acres to provide industry with at least 11 years of drilling opportunities in New Mexico. While careful management and planning by industry and states may be necessary (particularly in New Mexico), our analysis indicates impacts from the Moratorium should be negligible.

4. Economic Efficiency Analysis of the Moratorium

Regulating the pace and scale of resource management, such as done by the temporary leasing Moratorium, is not a new concept for limiting negative and unintended consequences. In response to overcutting of our forests, President Teddy Roosevelt's Chief Forester Gifford Pinchot recommended controlling the pace and scale of logging, a practice known as forest regulation. Pinchot's goal was to provide "the greatest good for the greatest number for the longest time." Phased energy development, by regulating the pace and scale of drilling, simply applies the practice and the long-term goal to the production of oil and natural gas.

Phased energy development explicitly regulates the pace and scale of drilling.⁹ Pace indicates how quickly wells are drilled and an area is developed. Scale covers the number of wells drilled and the spatial extent of development. Phased energy development regulates pace and scale because they are key variables for internalizing the spillover environmental damages, mitigating boom and bust cycles, avoiding the resource curse, and implementing responsible oil and gas development.¹⁰

Phasing down oil and gas leasing also produces immediate benefits, particularly for ecosystem service production and conservation. When initial cutbacks on oil and gas development on federal lands are moderate and only target new leases, such as the Moratorium, the correlating costs and employment impacts are likely to be minimal. This is advisable so all stakeholders have ample time to plan an economically efficient energy transition.

4.1 Leasing Moratorium Benefits

The Moratorium, by slowing the pace and scale of leasing, allows time to establish a more fiscally and environmentally responsible approach to oil and gas development on federal lands. The Moratorium provides temporary protection to public land not currently leased, while the BLM re-balances its approach to multiple use management. This pause will afford time for critical information collection and can be a catalyst for having public lands lead the national course correction necessary in the face of climate change.

4.1.1 Conservation Benefits

The benefits of the leasing moratorium include the enhanced multiple uses accrued by protecting public land which has high values for wildlife habitat, recreation, potential wilderness, and numerous other ecosystem services. In addition to the leasing moratorium, President Biden's executive orders also included a goal of conserving nearly a third of US land and ocean waters by 2030. A benefit of the leasing moratorium is the time for the BLM to evaluate the conservation value of lands currently not leased for meeting that ambitious conservation goal.

This newfound ecosystem protection for more than a million acres of public lands a year that will not be sold to oil and gas companies is a boost for conservation efforts that is highly valued by the public. Economists recently estimated the value of ecosystem conservation¹¹ in a global meta-analysis of willingness-to-pay for protecting landscapes from extractive development, finding within-sample mean predictions of \$230 (in 2021 US dollars) per affected household for the

⁹ Haefele, M. and P. Morton. 2009. The Influence of the Pace and Scale of Energy Development on Communities: Lessons from the Natural Gas Drilling Boom in the Rocky Mountains, WESTERN ECONOMICS FORUM 8(2):1-42.

¹⁰ Morton, P. 2012. Phased Energy Development and the Precautionary Principle: Good for Critters and Communities. Presentation at the Restore the West Conference, Utah State University, Logan, UT.

<https://www.youtube.com/watch?v=VjZH2p5Rajo>

¹¹ Hjerpe, E., Hussain, A., & Phillips, S. (2015). Valuing type and scope of ecosystem conservation: a meta-analysis. *Journal of Forest Economics*, 21(1), 32-50.

largest landscape preservation example studies. In FY 2020, 1.87 million acres of public lands were included in federal oil and gas leases issued. The temporary protection afforded to federal acres that would have been leased, if not for the Moratorium, includes vast swaths of public lands likely to be well over one million acres for the first year of the Moratorium. The scale of protection yielded by the Moratorium represents a much larger preservation effort than any of the preservation programs included in the utilized meta-analysis estimates,¹² though the saved public lands from leases tend to be less scenic than those lands already protected as National Parks and Wilderness.

Since the leasing Moratorium is focused on federal lands across the US that are publicly owned, the affected households are all US households. Assuming that this newly derived land protection stays in place over time and that at least 10 percent of all US households are willing and able to pay for this ecosystem protection, a quite conservative measure of WTP for protecting almost one million acres of federal lands from oil and gas development is approximately \$3 billion (\$230 x 13 million US households). This value dwarfs the correlating \$78 million in lease sale revenue and bonus bids that occurred in FY 2020 (see next section on Moratorium costs).

4.1.2 Information Benefits

Perhaps the greatest benefit of the Moratorium is that it allows for information to be collected, studies completed, and decision documents updated, in order to make more informed policy decisions. In Colorado, Boulder and Rio Grande counties have both used moratoriums on oil and gas development to allow more time for studies to be completed. The length of the moratorium can be based, in part, on the time necessary to update decision documents.

The information to be updated include: 1) a comprehensive review of leasing, permitting and bonding policies; 2) planning information from updating national program documents; 3) scientific information from new studies; and 4) economic information on the regional economic impacts from transitioning away from oil and gas production. Table 2 summarizes information benefits from using the leasing moratorium to review and update policies governing responsible oil and natural gas development on public land.

¹² *Ibid.*

Table 2. Benefits from Updating Federal Oil and Gas Information and Decision Documents

Information Updated	Explanation of Benefits
Review and Update Oil and Gas Leasing and Permitting Policies	Identify inefficiencies and revise policies for lease suspensions, rental rates, minimum bids, non-competitive lease sales, and royalty rates.
Review and Update Bonding Policies	Increase bonding amounts to cover the costs of plugging wells and fully restoring the site.
Report on Abandoned, Orphaned and Reclaimed Wells	Estimate costs to plug and reclaim abandoned and orphaned wells leaking methane pollution. Review reclamation success of reclaimed lands. Explore the use of per well impact fees to provide a stable source of funding.
Budget Analysis of Funding Needed to Implement Fiscally and Environmentally Responsible Oil and Gas Development	BLM funding is insufficient to fully implement management plans. Identify budgets gaps - underfunded programs in need of budgetary resources and increased staff to implement responsible oil and gas development.
Net Fiscal Impact Statement on Return to Taxpayers	Provide information on net revenue to taxpayers for evaluating fiscal responsibility of BLM's oil and gas program.
Update DOI/DOE Reports on Access to Onshore Federal Lands' Oil and Gas Resources and Reserves	Reports produced during Bush Administration examined access to technically recoverable oil and gas resources. Update reports to examine access to economically recoverable resources and proven reserves.
Review Regulatory Compliance History	Understand the frequency of waiving and exempting wildlife stipulations and environmental regulations. Identify bad actors based on fines, penalties, spills, unused drilling permits, and non-producing acres.
Cumulative Effects Analysis of Environmental Impacts at Multiple Spatial Scales	NEPA regulations require agencies to quantitatively account for direct effects, indirect effects, as well as cumulative environmental effects. Cumulative effects of the last 20 years of drilling can be examined as part of a PEIS.
Programmatic Environmental Impact Statement (PEIS) of the Federal Oil and Gas Program	A PEIS allows the BLM to examine the oil and gas program in its entirety. The PEIS provides programmatic guidance for preparing resource management plans.
Update Policy for Internalizing Non-market Benefits and Costs in Planning Documents	Methods for utilizing nonmarket environmental benefits and costs in EIS-level NEPA analyses and documents. Guidance should include methods for accounting for the social cost of carbon and methane in decision documents.
Assess Quality of Baseline Data, Monitoring and Enforcement efforts.	High quality data address uncertainties, provide more accurate predictions of environmental impacts and are required to make reasoned analyses in order to decrease environmental risks.
Regional Economic Impacts	Which states and counties will be positively or negatively impacted by the moratorium and down regulating oil and gas development? What transition strategies are available to assist negatively impacted communities and displaced workers?

While production continues from existing wells on public land, Biden's leasing moratorium provides time for the BLM to identify fiscal inefficiencies in the current oil and gas leasing program.

For example, the BLM should examine the fiscal consequences of having millions of acres under lease but not in production including the acres suspended. For example, in 2015, over 3 million acres of leased land was in suspension and not paying rental fees or royalties.¹³ Bonding amounts can also be examined as research suggests over \$1 billion in legacy costs on federal land from fiscally inefficient bonding policies.¹⁴

Other glaring fiscal information needs for federal oil and gas programs include how much it cost taxpayers to set up a lease sale. When the BLM leases land for just \$2 per acre, does the lease revenue cover the administrative and oversight costs of the lease sale? Below cost timber sales were a huge issue for the Forest Service back in the 1990s. The same fiscal arguments apply to the BLM setting minimum bids for oil and gas leasing sales at \$2 per acre.¹⁵ To the extent that “below cost leasing” occurs, it represents an implicit subsidy for industry and another focal point of Biden’s Executive Order.

A Net Fiscal Impact Statement will help address the frequency and magnitude of below cost leasing. Historical lessons from the decade-long debate over below cost timber sales suggest that the BLM should stop leasing areas where net revenue is negative. As a result of focusing staff and budget on leasing and processing drilling permits, there is ample evidence of insufficient staff and funding to implement all of the commitments made in BLM planning documents. Plans developed without consideration of budget constraints result in unfunded mandates and broken promises.

The Moratorium also provides time for the BLM to update its Programmatic Environmental Impact Statement (PEIS) for the oil and gas program. Having an up-to-date PEIS allows for more efficient planning – because the PEIS can be referenced in resource management planning documents. The BLM should also update its guidance on utilizing nonmarket environmental benefits and costs in EIS-level NEPA analyses and documents. Accounting for the social cost of carbon and methane is needed to take into consideration climate change in BLM NEPA documents.

4.1.3 Climate Benefits as Catalyst for a National Course Correction

The Stockholm Environment Institute estimates that in order to meet climate goals, oil and gas production has to decrease 6 percent per year.¹⁶ If the U.S. is going to meet climate goals by reducing production of oil and gas, the leasing moratorium for public land is an essential first step. The leasing Moratorium generates climate benefits as a symbolic catalyst for a national course correction necessary to address the realities of our changing climate. The Moratorium sends a

¹³ United States Government Accountability Office. (2018). Oil and Gas Lease Management:

BLM Could Improve Oversight of Lease Suspensions with Better Data and Monitoring Procedures. GAO-18-411.

¹⁴ Morton, P., J. Kerkvliet and E. Hjerpe. Impact Fees, Bonding Reform and Oil and Gas Development. Forthcoming. Colorado Natural Resources, Energy, & Environmental Law Review. Volume 32, Issue 1.

¹⁵ Morton, P., J. Kerkvliet and E. Hjerpe. (2015). Comments on BLM’s Advanced Notice of Proposed Oil and Gas Rulemaking. Conservation Economics Institute. 31p.

¹⁶ SEI, IISD, ODI, E3G, and UNEP. (2020). The Production Gap Report: 2020 Special Report.

<http://productiongap.org/2020report>

signal to the marketplace and to companies that the Administration is serious about transitioning our economy by reducing pollution and our dependency on oil and gas. The Moratorium provides a “test run,” for companies to prepare for the significant course correction necessary to transition our economy to cleaner and renewable sources of energy.

The Moratorium can also be a catalyst for demonstrating an economic transition from oil and gas industries into greener industries. That is, the Administration can help federal lands play a leading role in being an exemplary model for hastening an energy transition while limiting and offsetting any adverse effects.

4.2 Leasing Moratorium Costs

The costs of the Moratorium can be primarily boiled down to lost lease sale and bonus bid revenue. While royalties may be affected in a few years if the temporary Moratorium becomes permanent, the short-term effect of the Moratorium will only be lost lease revenue. Federal lease revenue goes to the US Treasury, with approximately half of the lease revenue being returned to the states where they were purchased. Lease revenue is a very small part of the federal revenue from oil and gas development, which is dominated by royalty payments. Lease revenue represents the revenue, or return, to US tax holders from allowing oil and gas development on public lands.

FY 2020 total receipts from competitive oil and gas sales on federal lands were \$78 million, of which \$47 million were from New Mexico (or 60% of total receipts).¹⁷ In FY 2020, 5.3 million acres of federal lands were offered for sale, while 1.87 million acres were issued in federal leases. The \$78 million can be considered as the national costs coming from the leasing Moratorium, if we assume that FY 2020 is representative of near-term future leases that would have been sold without a Moratorium.

If the leasing Moratorium encourages industry to increase production on federal non-producing acres or increase wells on federal producing acres, as is likely the case, revenue losses from lease sales will be more than offset by an increase in federal royalties. The increase in marginal revenue from increasing production on leases will minimize the loss of leasing revenue and bonus bids from the Moratorium.

Additionally, much of the leasing receipts are administrative fees used to pay for salaries of federal BLM employees (and state employees) to conduct new federal lease sales. These administrative fees are no longer needed during a leasing Moratorium, significantly reducing the overall cost of the Moratorium. Finally, these costs are dwarfed by the conservation benefits (conservatively estimated at \$3 billion) indicating that overall national benefits of the Moratorium outweigh the costs by almost 40 times.

¹⁷ BLM Oil and Gas Statistics, Competitive Oil and Gas Lease Sales.

5. Energy and Economic Transition in the Rural Intermountain West

In this section we look to future development of rural communities in the IMW and investigate a transition plan for regions most dependent on federal oil and gas production. We start by illustrating the economic restructuring that has been widespread in the rural American West, including the IMW, that affords rural communities greater economic development opportunities than in the past. Then, we offer a transition approach for cleaning the legacy and existing supply-chain of oil and gas that can provide high paying jobs targeted to workers with similar skill sets as found in oil and gas development. We include an appendix (**Appendix B**) that looks further at the economic restructuring in the rural IMW, the minor importance of oil and gas industry jobs, the low quality of oil and gas work in the IMW, and the adverse economic consequences that result from high dependency on oil and gas production.

5.1 The Leasing Moratorium and Diversified Rural Economic Development

Over the last four decades, there has been a structural economic change in the rural American West as extractive industries, agriculture, and manufacturing have given way to service industries (see Figure 15 for Montana example which is illustrative of all five IMW states).¹⁸ These service industries include typical tourism sectors such as lodging, restaurants, and outfitting but also include many high-wage service industries such as financial, medical, and professional services. Instead of traditional migration, where people followed jobs and were focused primarily on increasing wages and wealth, amenity migration began in earnest when many migrants started to pursue greater quality of life that focused on environmental quality and outdoor recreational activities, especially those provided by public lands.¹⁹

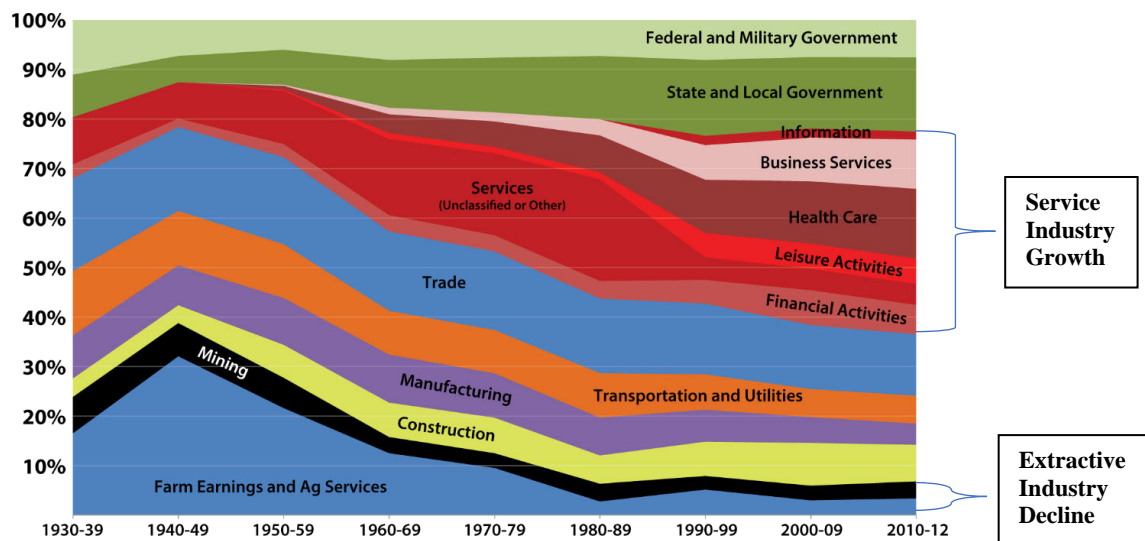
In terms of amenity migration and development, recent research demonstrated that public lands with greater protection were positively associated with greater migration rates and that oil and gas dependent counties in the rural West were negatively associated with migration rates from 1980-2010.²⁰ Conservation attracts people and businesses; intensive oil and gas development repels people and businesses over the long run.

¹⁸ Beyers, W. B., & Nelson, P. B. (2000). Contemporary development forces in the nonmetropolitan West: New insights from rapidly growing communities. *Journal of rural studies*, 16(4), 459-474.

¹⁹ Power, T. M. (1996). *Lost landscapes and failed economies: The search for a value of place* (Vol. 38). Washington, DC: Island Press.

²⁰ Hjerpe, E., Hussain, A., & Holmes, T. (2020). Amenity migration and public lands: Rise of the protected areas. *Environmental management*, 66(1), 56-71.

Figure 15: Share of Montana Personal Income by Industry



Source: Montana Department of Labor and Industry, Research and Analysis Bureau; Author: Barbara Wagner²¹

From a regional perspective, a Moratorium on federal leasing for oil and gas can spur local monitoring, policies, and strategies to generate more sustainable and diversified rural economic development. In Western rural regions with little economically recoverable oil and gas resources, more sustainable economic development has largely already occurred in the form of conservation-based amenity development combined with agriculture and some resource development on private lands. The resulting high-wage information and service jobs represent an infilling of communities adjacent to public lands.

For regions with economies more dependent on oil and gas extraction, a Moratorium on federal leasing will have little effect on employment totals in the near-term but will provide an impetus for using local public lands for non-extractive multiple uses. Part of this regional economic transition will require protecting remaining public lands nearby that have not been developed for oil and gas and envisioning development strategies for these conservation lands (e.g., increased tourism, fishing, hunting, off-road riding, mountain biking, nature viewing, etc.) while increasing environmental protections. Oil and gas dependent counties in the IMW tend to have less amenity migration and development in part because oil and gas development has precluded these regions from diversifying into conservation-based development options.

Another part of an economic transition for oil and gas dependent regions will be cleaning and reclaiming legacy wells that have been abandoned, orphaned, or idled for too long, along with capturing methane from existing oil and gas production. In regions more dependent on federal oil

²¹ Available at: [Economy \(mt.gov\)](http://Economy.mt.gov)

and gas production, such as Wyoming and New Mexico, these transition jobs will be an important part of stimulus aimed at easing any job displacement that may occur if the Moratorium is extended.

5.2 Economic Transition Strategies

A targeted focus on plugging orphaned and abandoned wells is a job creating transition strategy not affected by the Moratorium that does not require drilling new wells. Consider for a moment, a national goal of plugging and restoring all abandoned and orphaned wells in the next decade, accomplishing such an ambitious goal will not only reduce methane pollution but will generate tens of thousands of transition jobs. And since those wells are primarily located in resource extractive counties, the job benefits would flow directly to workers in those communities that may be negatively affected by the Moratorium.

Aggressively capturing methane pollution is another good transition strategy for affected communities. Frequent monitoring and plugging leaks can help reverse the downward trend in oil and gas jobs from labor saving technology by increasing the jobs per barrel of oil and mcf of gas produced. Plugging leaks at well pads and maintaining pipelines creates a constant need for local blue-collar jobs similar to plumbers plugging leaks in water pipes.

Finally, another transition strategy is to locate renewable energy projects near affected communities interested in diversifying their energy supply and creating jobs to help them economically transition away from dependency of oil and gas production.

5.2.1 Plugging and Reclaiming Abandoned Wells

Proposals to reduce or even eliminate oil and gas development on public lands, and methane capture requirements for remaining operations, are often met with concern about lost jobs and the cost to adjacent communities. Recent research shows that the job losses would be minimal, that displaced workers can remain employed in the industry working to plug and reclaim abandoned non-producing wells, and that these activities will produce a net benefit for society in terms of reduced greenhouse gas emissions, particularly reduced methane emissions.

This is a summary of the review of the most recent literature on the extent of the abandoned oil and gas well issue, the cost to address abandoned wells (plugging and reclamation), the potential to create jobs that can facilitate a transition for oil and gas workers, and the estimated benefits from reduced emissions of greenhouse gasses.

We use the terminology of “plugged and abandoned” to refer to wells that have been appropriately decommissioned. Wells that are abandoned and unplugged are those which are no longer producing economic quantities of oil or gas, but which have not been decommissioned. Some of these wells have no known operator or owner and are called “orphan wells.”

Table 3: Estimated Number of Unplugged Abandoned Oil and Gas Wells

Source	U.S. Total			Western U.S.		
	All wells	Oil wells	Gas wells	All wells	Oil wells	Gas wells
Interstate Oil and Gas Compact Commission ²²	56,600			9,031		
Energy Information Administration ^{23 a}	531,517	294,682	236,835	131,839	59,572	72,267
Resources for the Future ²⁴	2,100,000					
Environmental Protection Agency ^{25 b}	3,359,983	2,713,458	646,525			
Carbon Tracker ²⁶	3,300,000-4,000,000					

^a The EIA numbers shown are wells producing below 10 barrels per day (or equivalent for gas). These quantities are likely so small they are only economically feasible because the cost to decommission the well is greater than the operating cost (Raimi et al. 2021).

^b Includes both plugged and unplugged abandoned wells.

Table 4: Estimated Costs of Plugging Abandoned Oil and Gas Wells

Source	Lower (per well)	Upper (per well)
Resources for the Future (2020) ²⁷	\$24,000	\$48,000
Raimi et al. (2021) ²⁸	\$20,000	\$76,000
GAO (2019) ²⁹	\$20,000	\$145,000
Carbon Tracker ³⁰	\$30,000	\$300,000
Well Done Foundation ³¹	\$30,000	
Kang et al. (2019) ³²	\$37,000	

²² Interstate Oil and Gas Compact Commission (IOGCC), 2019. Idle and Orphan Oil and Gas Wells: State and Provincial Regulatory Strategy. 68 p. <https://iogcc.ok.gov/idle-and-orphan-wells> (accessed 4/20/2021).

²³ EIA, 2020. The Distribution of US Oil and Natural Gas Wells by Production Rate <https://www.eia.gov/petroleum/wells/>.

²⁴ Raimi, D., N. Nerurkar, and J. Bordoff. 2020. Green Stimulus for Oil and Gas Workers: Considering a Major Federal Effort to Plug Orphaned and Abandoned Wells. Report from Center on Global Energy Policy and School of International and Public Affairs (both Columbia University) and Resources for the Future (RFF). 27 p. <https://www.energypolicy.columbia.edu/research/report/green-stimulus-oil-and-gas-workers-considering-major-federal-effort-plug-orphaned-and-abandoned>.

²⁵ EPA, 2021. "Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2019," Washington, D.C., 2021, <https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2019>

²⁶ Schuwerk, R. and G. Rogers. 2020a. It's Closing Time: The Huge Bill to Abandon Oilfields Comes Early. Report: Carbon Tracker Report, 45 p. <https://carbontracker.org/reports/its-closing-time/>

²⁷ Raimi et al. 2020.

²⁸ Raimi, D., Krupnick, A. J., Shih, J., Thompson, A. 2021. Decommissioning Orphaned and Abandoned Oil and Gas Wells: New Estimates and Cost Drivers. ChemRxiv. Preprint. <https://doi.org/10.26434/chemrxiv.14378483.v1>

²⁹ U.S. Government Accountability Office. 2019. Report to Congressional Requesters, Oil and Gas: Bureau of Land Management Should Address Risks from Insufficient Bonds to Reclaim Wells. September 2019. 34 p.

³⁰ Schuwerk, R. and G. Rogers. 2020a.

³¹ Well Done Foundation: <https://welldonefoundation.com/>

³² Kang, M., Mauzerall, D.L., Ma, D.Z., and Celia, M.A. 2019. Reducing methane emissions from abandoned oil and gas wells: Strategies and costs. *Energy Policy*, 132: 594-601.

We start with some definitions of the terms used to describe the potential employment. Job-years refer to the cumulative total jobs created over the life of a project. For example, if a project created 1 job for 10 years this would be 10 job-years. A project that created 10 jobs for 1 year would also be 10 job-years. Another way to analyze the potential employment from a project is to estimate the overall economic impact which takes into account the direct employment plus the ripple effects associated with the project. Direct jobs are those working directly on the project; indirect jobs are those created by suppliers of goods and services needed for the project; and induced jobs are the jobs that result when the direct and indirect workers spend money in the local economy.

Two recent reports have estimated the employment impacts of plugging and abandoning oil and gas wells. The report from Resources for the Future (Raimi et al. 2020) estimated the average number of job-years per well (0.24). Another report (Pollin et al. 2021) uses economic impact analyses to estimate the direct, indirect, and induced employment, and a total of 1,908,000 job-years over 10 years. From this we calculate 0.74 job-years per well to plug 2.6 million wells, when including total effects.

The table below shows estimates of job-years and the overall employment that would result from a program to plug and abandon 2.6 million wells. Nationwide, there are approximately 1,072,000 jobs in the various sectors of the oil and gas industry.³³ Of those 654,492 require skills that are not readily transferable to other industries. This is comparable to the potential direct employment estimated by Pollin et al. (852,000) for plugging and abandoning wells (presumably requiring some of the skills specific to the industry).

Table 5: Estimated Employment from Plugging Abandoned Wells

Source	Job-years per well		Total jobs			Annual job creation
Resources for the Future (2020) ³	0.24				205,065 ^a	
Pollin et al. (2021) ³⁴	0.33 ^b	Jobs per \$1 million	Direct	7.1	852,000 ^c	85,200
			Indirect	3.2	384,000	38,400
			Induced	5.6	672,000	67,200
			Total	15.9	1,908,000	190,800

^a Average number of abandoned wells multiplied by job-years per well and divided by 3 years to plug-abandon each well (assumed by Raimi et al. 2020). $((2,563,317 * 0.24)/3)$

^b Calculated $(852,000 \text{ direct job-years} / 2,563,317 \text{ wells})$

^c Annual job estimates multiplied by 10 years.

³³ Baker, D. and Lee, A. 2021. The Employment Impact of Curtailing Fossil Fuel Use. Washington DC: Center for Economic and Policy Research. 120p. <https://cepr.net/report/the-employment-impact-of-curtailling-fossil-fuel-use/>

³⁴ Pollin, R., Chakraborty, S., and Wicks-Lim, J. 2021. Employment Impacts of Proposed U.S. Economic Stimulus Programs: Job Creation, Job Quality, and Demographic Distribution Measures. University of Massachusetts, Amherst, Political Economy Research Institute. 70 p.

Raimi et al. (2020) compiles several estimates of methane emissions per well which range from 0.03 metric tons to 0.19 metric tons. We use the average (0.11 metric tons per well) along with the average number of abandoned wells to estimate total annual methane emissions (281,965 metric tons).

The Interagency Working Group on the Social Cost of Greenhouse Gases produces estimates of the dollar value associated with continued emissions of carbon, methane, and other pollutants. These estimates increase over time based on the assumption that if emissions continue unabated the impacts will increase as these gasses accumulate. We have applied the most recent estimates of the social cost methane,³⁵ for 2020-2050 (in 2020 dollars) to derive the potential annual benefit to society from plugging and abandoning non-producing oil and gas wells.

Table 6: Potential Annual Benefit from Plugging All Abandoned Wells

Social cost of 281,965 metric tons of methane ^a		
Year	SCM (in \$2020)	Total Social Cost
2020	\$670	\$188,916,433
2025	\$800	\$225,571,861
2030	\$940	\$265,046,936
2035	\$1,100	\$310,161,309
2040	\$1,300	\$366,554,274
2045	\$1,500	\$422,947,239
2050	\$1,700	\$479,340,204

^a Uses the average discount rate of 5%

A program to decommission (plug and abandon) the approximately 2.6 million unplugged abandoned oil and gas wells in the U.S. could produce as many as 852,000 direct jobs and over time result in the elimination of nearly 282,000 metric tons of methane with a resulting annual benefit to society of \$479 billion by 2050.

5.2.2 Methane Capture from Existing Oil and Gas Production

While addressing legacy wells can play a large role in cleaning up long-term oil and gas emissions, capturing methane from existing production of oil and gas on federal lands should also play a large role in stimulus job creation and emissions reductions. Leak detection and repair (LDAR) is a

³⁵ Interagency Working Group on Social Cost of Greenhouse Gases, United States Government. 2021. Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide: Interim Estimates under Executive Order 13990. February 2021. 48 p.

means to stop excessive flaring and wasting of gas that can create numerous jobs and can reduce emissions.

Methane is a greenhouse gas about 25 times more potent than carbon dioxide over a 100-year timeframe but even more potent (86 times) over 20-year timeframe. Methane pollution accounts for nine percent of all U.S. greenhouse gas emissions and almost one-third of that is estimated to come from oil and gas operations.³⁶ In addition to methane pollution, the Government Accountability Office (GAO) estimated taxpayers lose as much as \$23 million royalty revenues each year when natural gas is wasted.³⁷

Pollin et al.³⁸ include estimates of jobs needed for leak repairs on pipelines only, with direct jobs only at 1.1 per million dollars of spending, but 8.6 total jobs (including direct, indirect, and induced jobs) per million dollars of output. However, they show that leak detection and repair jobs are of very high quality (Table 6A), illustrating that these jobs have the highest average total compensation (\$152,000) of all analyzed stimulus jobs and have the highest rates of provided health insurance and retirement benefits. We believe that the direct jobs needed for leak repairs on existing oil and gas wells, gathering facilities, and pipelines far exceeds the estimates provided for just focusing on pipelines.

6. Conclusions

It must be recognized that very little employment in the West is coming from the oil and gas sector (see Appendix B). The main drivers of economic development are the region's natural amenities (i.e., clean air and water, outdoor recreation, scenic beauty, wildlife) with job growth coming from other sectors (e.g., health care, outdoor recreation, IT, retirees). Many communities will benefit economically from the leasing Moratorium as it conserves the natural amenities important for their economies. Public health and environmental justice benefits will flow to communities far from public land - if the moratorium leads to phasing out federal production of fossil fuels, power plants, and refineries polluting the air in their neighborhoods.³⁹

The leasing Moratorium only limits new leasing – still allowing continued production from existing and new wells on the millions of acres of public land already under lease. The Moratorium also

³⁶ "2016 Waste Prevention Rule". 81 Fed. Reg. 83,008 (Nov. 18, 2016). Bureau of Land Management.

³⁷ GAO-11-34. Federal Oil and Gas Leases: Opportunities Exist to Capture Vented and Flared Natural Gas, Which Would Increase Royalty Payments and Reduce Greenhouse Gases. Available here: [GAO-11-34 Federal Oil and Gas Leases: Opportunities Exist to Capture Vented and Flared Natural Gas, Which Would Increase Royalty Payments and Reduce Greenhouse Gases](#)

³⁸ Pollin, R., Chakraborty, S., and Wicks-Lim, J. 2021. Employment Impacts of Proposed U.S. Economic Stimulus Programs: Job Creation, Job Quality, and Demographic Distribution Measures. University of Massachusetts, Amherst, Political Economy Research Institute. 70 p.

³⁹ Affected communities include those near oil and gas wells, compressor stations and pipelines, as well as communities living near refineries and power plants – which are often low-income and communities of color. <https://www.psehealthyenergy.org/our-work/energy-storage-peaker-plant-replacement-project/>

does not affect production from private land. In Colorado, for example, the majority of oil and gas is produced on private land.⁴⁰

Any negative impacts of an extended Moratorium and down regulating oil and gas development will be reserved for the few counties that are heavily dependent on oil and gas from federal lands. A review of the facts surrounding a temporary Moratorium, however, indicates that drilling opportunities are not scarce, as industry has millions of acres of public land under lease but not in production. The supply of leased acres means that there will be virtually no short-term effects on oil and gas jobs and production due to the Moratorium on leasing. Industry has had 50 years to lease public land and has already leased the most economic parcels of land. What remains on federal lands are largely speculative and uneconomic prospects, with low potential for oil and gas development, and have much greater value serving as protected wildlife habitat and conservation lands.

Given the local air and water pollution,⁴¹ the harmful effects on wildlife through habitat fragmentation and sedimentation,⁴² the general disruption of local ecosystem services,⁴³ and the adverse socio-economic topics discussed in Appendix B (e.g., the resource curse, associated crime, and the lack of sustainability), oil and gas development on public lands is certainly not a regional economic panacea and is actually detrimental to long term economic development. These are the socio-economic issues that tend to be left out of discussions focused on policies that may eventually spur changes in employment on federal lands.

The Moratorium on fossil fuel leasing on public lands is a positive first step in addressing the economic and environmental issues associated with oil and gas production. A Moratorium not only provides the federal government time to better plan our energy production on public lands, but importantly, also allows oil and gas dependent communities time to understand and plan for their economic development futures.

⁴⁰ Most of the onshore economically recoverable oil and gas is located underneath private land - which explains industry's increasing interest in drilling on private land and declining interest in drilling on public land.

⁴¹ E.g., Kerkvliet J. and P. Morton. 2019. Assessing the Health Costs of Air Pollution from Unconventional Oil and Gas Development, Research Report. Conservation Economics Institute.

⁴² E.g., Sawyer, H., Lindzey, F., McWhirter, D., & Andrews, K. (2002). Potential effects of oil and gas development on mule deer and pronghorn populations in western Wyoming. *US Bureau of Land Management Papers*, 5; Copeland, H. E., Doherty, K. E., Naugle, D. E., Pocewicz, A., & Kiesecker, J. M. (2009). Mapping oil and gas development potential in the US Intermountain West and estimating impacts to species. *PloS one*, 4(10), e7400; Brittingham, M. C., Maloney, K. O., Farag, A. M., Harper, D. D., & Bowen, Z. H. (2014). Ecological risks of shale oil and gas development to wildlife, aquatic resources and their habitats. *Environmental science & technology*, 48(19), 11034-11047.

⁴³ E.g., McClung, M. R., & Moran, M. D. (2018). Understanding and mitigating impacts of unconventional oil and gas development on land-use and ecosystem services in the US. *Current Opinion in Environmental Science & Health*, 3, 19-26.

Appendix A: Methods for Estimating Years of Drilling Opportunity and Lease Expiration on Federal Lands

Using the NPL_{2020} stockpile information and the assumptions detailed in the text enables us to estimate how many leases will be preserved between 2021 and 2030 (by which time all stockpiled leases will expire if they are not drilled):

$$PL_i = \min\left(10 * \frac{1}{2} DI_i, NPL_{2020}\right),$$

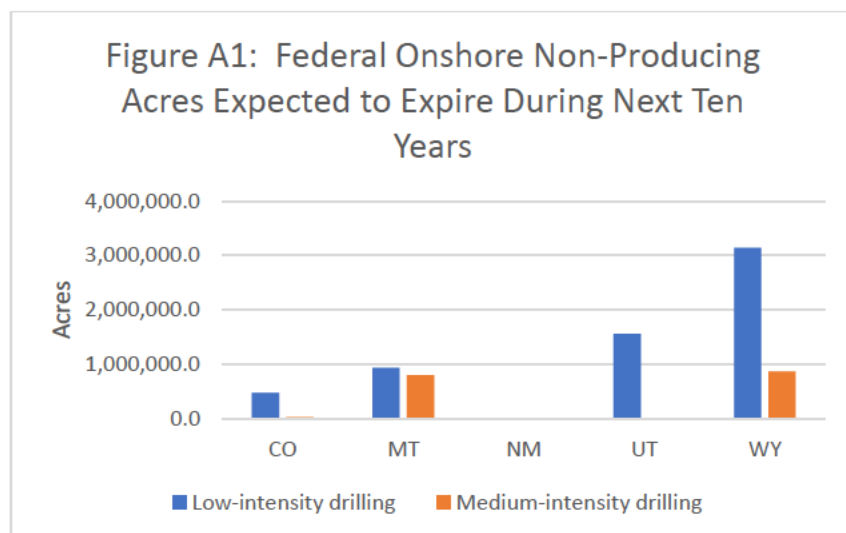
where PL_i denotes preserved leases under drilling intensity i , DI_i .

Preserved leases are converted to preserved acres by assuming an average lease size of NPA_{2020}/NPL_{2020} , where NPA_{2020} denotes the FY 2020 yearend stockpile of federal non-producing acres. This provides an estimate of the area the industry has at its disposal for future drilling. We assume industry will develop the preserved leases to the ten-year (2011-2020) average well density (\overline{APW}) on producing federal leases in the given region (state or nation).⁴⁴ Thus, years of drilling opportunities ($YODO_i$) is calculated as:

$$YODO_i = \frac{PL_i * \frac{NPA_{2020}}{NPL_{2020}}}{\frac{1}{2} DI_i * \overline{APW}}.$$

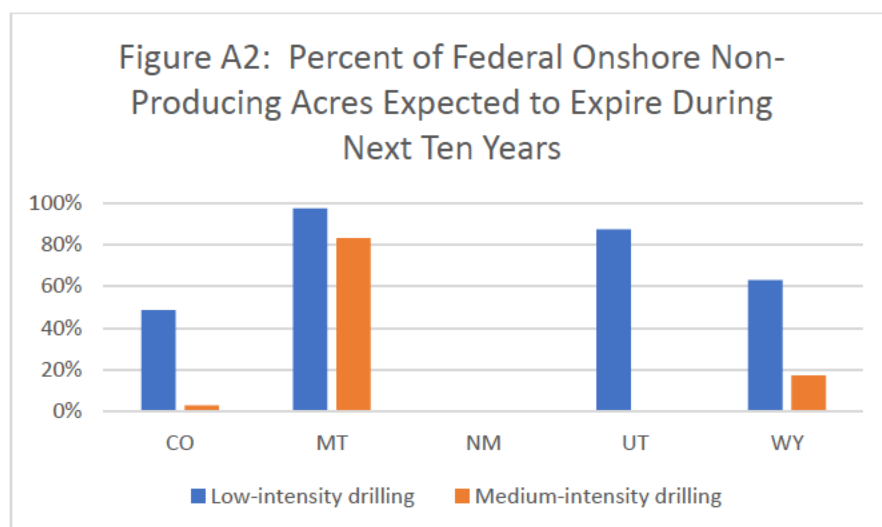
The national-level analysis results in lease expiration only under the assumption of low-intensity drilling, which results in more than 6,600 leases and 6.5 million acres expiring. State-level analyses indicate low-intensity drilling would result in more than 6,500 leases and 6.1 million acres expiring in the IMW region. Moderate-intensity drilling would preserve additional leases; fewer than 2,000 leases and 2 million acres would expire in the IMW region. The distribution of expired acreage is depicted in Figure A1. In New Mexico drilling rates are sufficiently high and stockpiled NPL_{2020} is sufficiently low that no leases or acreage are expected to expire, even with low intensity drilling. In contrast, there is such a large NPL_{2020} stockpile in Wyoming (where low-intensity drill rates are similar to those in NM and moderate-intensity drilling rates are 30% higher) that more than 3 million acres are expected to expire in the next 10 years unless moderate-intensity drilling is used.

⁴⁴ BLM data is used to calculate APW in year t as producing acres (PA) per well completion (WC): $APW_t = \frac{PA_t}{WC_t}$.



Data Source: CEI calculations

Figure A2 presents expired acres expressed as a percent of NPA_{2020} . Presented in this manner, the results illustrate the excessive speculative stockpiling undertaken by the industry, particularly in Montana, at considerable cost to taxpayers.

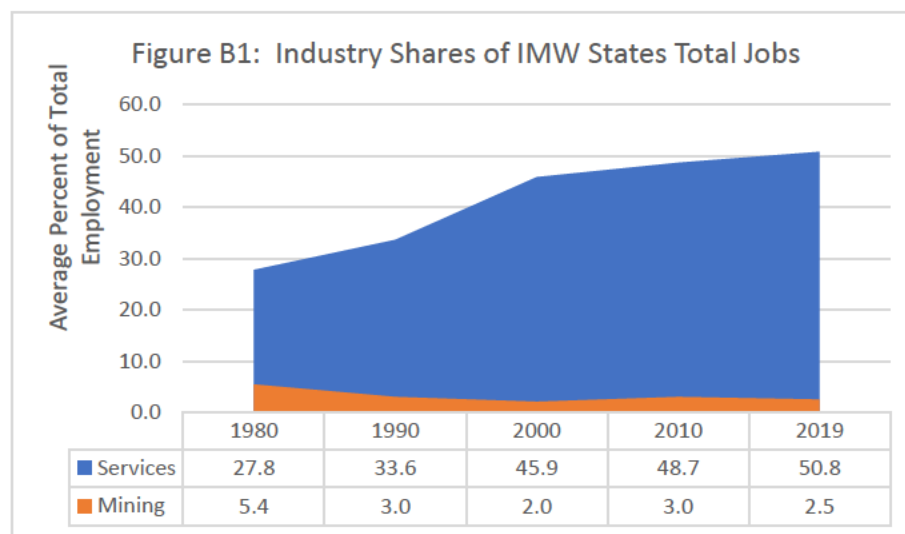


Data Source: CEI calculations

Appendix B: Economic Transition and the Resource Curse in the Intermountain West

With increased mobility, amenity migration was largely spurred by retirees with non-labor and transfer income and entrepreneurs, who were both attracted to the suite of ecosystem services offered by protected public lands.⁴⁵ This amenity development flipped the traditional economic script for many rural Western communities---where businesses looked to invest in the conservation and sustainability of a region as opposed to investors aiming to extract resources and profit from the land.

While amenity migration and development influenced the widespread economic structural change in the rural American West, changing perceptions and economic shortcomings of extractive industries also played a large role in economic restructuring. With numerous extractive industry busts and decreasing social acceptance of liquidating non-renewable resources and associated air and water pollution, concerns over resource extraction on public lands grew. Concurrently, technological advances in resource extraction steadily decreased the number of jobs needed per unit of extraction. Figure B1 illustrates the average percent of total employment for all five of our focal IW states.

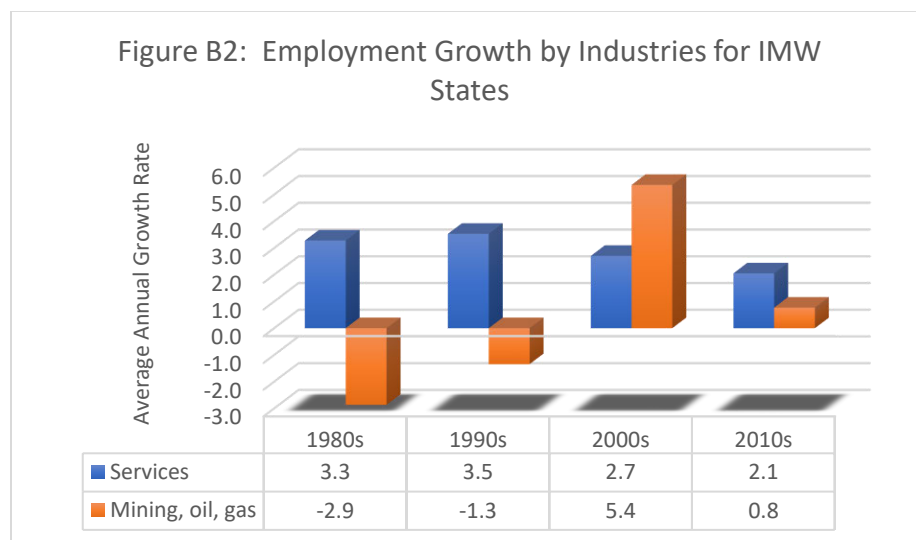


Data Source: U.S. Department of Commerce, Bureau of Economic Analysis

While overall mining jobs are a small fraction of all jobs in the West, employment growth should also be considered. Figure B2 shows decadal employment growth averages for service industries and mining industries, inclusive of oil and gas production. Oil and gas employment is highly volatile, as illustrated by major busts in the 1980s and 1990s and a boom in the 2010s. Once hard

⁴⁵ Rasker, R., & Hansen, A. (2000). Natural amenities and population growth in the Greater Yellowstone region. *Human Ecology Review*, 30-40.

rock mining and oil and gas employment on private lands are removed, the federal portion of job creation from oil and gas is minuscule, even in these most resource-dependent states.



Data Source: U.S. Department of Commerce, Bureau of Economic Analysis

Some of the regional economic problems with intensive oil and gas development are captured by the phenomenon known as the “resource curse” which has been associated with numerous oil and gas producing countries and regions, including IMW states such as Wyoming.⁴⁶ The “resource curse” happens when resource dependence depresses long-term GDP growth relative to diversified economies.⁴⁷ Broader versions of the “resource curse,” or the notion that places with abundant resource extraction are paradoxically impoverished at both environmental and socio-economic scales,⁴⁸ have also identified greater social problems associated with boom and bust cycles of unconventional oil and gas development, such as increased crime,⁴⁹ illegal drug use,⁵⁰ and a lack of municipal funds to cover the emergency and social services needed.⁵¹ For example, Inter-Mountain West counties with longer duration of oil and gas specialization were associated

⁴⁶ James, A. & Aadland, D. (2011). The curse of natural resources: an empirical investigation of U.S. counties,” *Resource and Energy Economics*, 33, 440–453.

⁴⁷ Haggerty, J., Gude, P. H., Delorey, M., & Rasker, R. (2014). Long-term effects of income specialization in oil and gas extraction: The US West, 1980–2011. *Energy Economics*, 45, 186-195; Kerkvliet, J. and P. Morton. (2017). Use Precaution: the fracking boom comes with risk of the resource curse. Paper and Presentation Prepared for the National Science Foundation Subsurface Workshop University of Colorado, Boulder, Colorado May 22-23, 2017.

⁴⁸ E.g., Mayer, A., Olson-Hazboun, S. K., & Malin, S. (2018). Fracking fortunes: economic well-being and oil and gas development along the urban-rural continuum. *Rural Sociology*, 83(3), 532-567.

⁴⁹ Komarek, T. M. (2014). Crime and natural resource booms: Evidence from unconventional natural gas production. *The Annals of Regional Sciences*, 1-25.

⁵⁰ Farrell, Patrick. 2005. Methamphetamine Fuels the West’s oil and gas boom. *High CountryNews*, Paonia, Colorado. October 3.

⁵¹ Morton, P., J. Kerkvliet and E. Hjerpe. Forthcoming. Impact Fees, Bonding Reform and Oil and Gas Development. *Colorado Natural Resources, Energy, & Environmental Law Review*. Volume 32, Issue 1.

with higher crime rates, long-term per capita income declines, and lower educational attainment rates.⁵² The quick wealth from resource extraction also encourages corruption and “rent seeking” – where rent seeking is defined as resources spent on getting political favors. Papyrakis and Gerlagh⁵³ found that resource reliance is correlated with an increasing number of public officials prosecuted for corruption.

Research has shown further problems associated with oil and gas employment, despite high paying wages. Loomis et al.⁵⁴ found that the risk of fatality in mining, inclusive of oil and gas labor, is ten times greater than the risk of fatality in the leisure and hospitality industry. Likewise, the risk of non-fatal injury was 2.5 times greater for mining in Montana as compared to the leisure and hospitality industry. Slowing down the pace and scale of drilling, with the Moratorium, will help reduce injuries and fatalities of workers in the oil and gas industry. Workers in the oil and gas industry face very high rates of injuries and fatalities – especially minority workers.⁵⁵ In essence, oil and gas industries have to offer higher wages to account for higher risks associated with those jobs and these higher wages do not translate into improved well-being.

Additionally, oil and gas production are dominated by a transient workforce that are not as invested in the long-term prosperity of adjacent communities. To wit, over 60% of gas field employment in Wyoming were not local residents.⁵⁶ Oil and gas production is also dominated by out-of-region corporations, where profits are leaked from the frontline communities dealing with the local pollution and increased truck traffic. McDonald et al.⁵⁷ estimated that 73% of the economic activity in Colorado’s Piceance Basin leaked out of basin and for the State of Colorado, 79% oil and gas extraction revenue left the state.

Increasing oil and gas well density displaces other uses and users, like outdoor recreation, becoming the sole use in some “multiple use” public lands.⁵⁸ Research has verified that oil and gas development is incompatible with tourism and recreation, showing that public lands with oil and gas wells incur less visitation and recreation than similar public lands without oil and gas

⁵² Haggerty, J., Gude, P. H., Delorey, M., & Rasker, R. (2014). Long-term effects of income specialization in oil and gas extraction: The US West, 1980–2011. *Energy Economics*, 45, 186-195.

⁵³ Papyrakis, E. and R. Gerlagh. (2007). Resource Abundance and Economic Growth in the United States. *European Economic Review*. 51: 1011-1039.

⁵⁴ Loomis, J. B., Kerkvliet, J., & Weiler, S. (2007). Are High Wage Jobs Hazardous to Your Health? The Myth That Attracting Higher Paying Extractive Industry Jobs Is a Desirable Community Economic Development Strategy. In *Western Economics Forum* (Vol. 6, No. 1837-2016-151766, pp. 10-14).

⁵⁵ AFL-CIO report. 2014. Death on the job: the toll of neglect. 204p.

⁵⁶ Bureau of Land Management. 2006. Draft Supplemental Environmental Impact Statement Pinedale Anticline Oil and Gas Exploration and Development Project Sublette County, Wyoming, Volume 1 of 2, December, Pinedale, WY; as referenced in Loomis et al. 2007.

⁵⁷ McDonald, L.A., H. W. Bender, E. Hurley, S. Donnelly and D. Taylor. (2007). Oil and Gas Economic Impact Analysis. Colorado Energy Research Institute, Colorado School of Mines, Golden, CO.

⁵⁸ Loomis, J. B., Kerkvliet, J., & Weiler, S. (2007). Are High Wage Jobs Hazardous to Your Health? The Myth That Attracting Higher Paying Extractive Industry Jobs Is a Desirable Community Economic Development Strategy. In *Western Economics Forum* (Vol. 6, No. 1837-2016-151766, pp. 10-14).

infrastructure.⁵⁹ Oil and gas development can also crowd out other businesses and entrepreneurs,⁶⁰ opportunity costs seldom discussed in rural development strategies.

While there are certainly positive economic effects from oil and gas development during boom periods, such as increases in jobs, royalties, and taxes, the comprehensive research discussed above illustrates how long-run community well-being can be diminished in regions overly dependent on oil and gas production and how these short term positive economic effects typically are not enough to cover the long-term negative effects. Alternately, outdoor recreation has been shown to be most sustainable form of public lands development.⁶¹ Local development strategies must be better informed with the full economic picture, beyond simple economic metrics of wages, jobs, and tax/royalty revenues.

The COVID-19 pandemic has intensified the shift from primary extraction and manufacturing to service industries and amenity development. For example, Wyoming has experienced nearly 68% less revenue from the mining sector, in the form of sales and use taxes, during 2020 as compared to 2019.⁶² Meanwhile, rural communities with attractive natural amenities have seen a dramatic increase in economic demand, especially as more and more people have begun working remotely and were fleeing to less crowded areas.⁶³ While excessive amenity development can be too much of a good thing, such as that seen in oft cited expensive gateway communities like Aspen, CO and Jackson, WY, the diversification of regional economies away from primary extraction and manufacturing provides improved economic metrics and greater environmental sustainability.⁶⁴

⁵⁹Rasch, R., Reeves, M., & Sorenson, C. (2018). Does oil and gas development impact recreation visits to public lands? A cross-sectional analysis of overnight recreation site use at 27 national forests with oil and gas development. *Journal of outdoor recreation and tourism*, 24, 45-51.

⁶⁰ Weber, Jeremy G. 2013. "In the Good Times and the Bad: Shale Gas Development and Local Employment." *Rural Connections* 7(2): 33– 36.

⁶¹ Hjerpe, E. E. (2018). Outdoor recreation as a sustainable export industry: A Case Study of the Boundary Waters Wilderness. *Ecological Economics*, 146, 60-68.

⁶² [Wyoming's mining industry still suffers as economy slowly recovers, new report shows | Energy Journal | trib.com.](#)

⁶³ [Influx of New Residents Brings Changing Vibe to Western Cities | Cities | US News.](#)

⁶⁴ Hjerpe, E., Armatas, C., Haefele, M. (In Review). Amenity development and protected areas in the American West. *Land Use Policy*.

From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: RE: [EXTERNAL] EIA on O&G Pause
Date: Thursday, May 6, 2021 10:47:27 AM

Fabulous

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Thursday, May 6, 2021 8:43 AM
To: Culver, Nada L <nculver@blm.gov>
Subject: RE: [EXTERNAL] EIA on O&G Pause

(b) (5)

From: Culver, Nada L <nculver@blm.gov>
Sent: Wednesday, May 5, 2021 12:44 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: FW: [EXTERNAL] EIA on O&G Pause

(b) (5)

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: stephenne harding (b) (6) >
Sent: Wednesday, May 5, 2021 10:17 AM
To: Culver, Nada L <nculver@blm.gov>
Subject: [EXTERNAL] EIA on O&G Pause

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ICYMI

EIA also says minimal effects in 2022. Here it is:

<https://www.eia.gov/outlooks/steo/archives/mar21.pdf>

Page 16, emphasis mine:

In this STEO, EIA included initial adjustments arising from the effects of the pause on federal oil and natural gas leasing outlined in Executive Order 14008. EIA assumes that no new federal leases are granted during the STEO forecast period but that permitting and drilling on currently held federal leases continues pursuant to Section 3, Subsection G of Department of Interior Order SO-3395. No effects will likely occur until 2022 because there is roughly a minimum eight-to-ten month delay from leasing to production in onshore areas and longer in offshore areas. **Incorporating this change reduced U.S. crude oil production by less than 0.1 million b/d on average in 2022.**

From March:

<https://thehill.com/policy/energy-environment/542811-biden-leasing-pause-wont-impact-energy-production-this-year-agency>

“No effects will likely occur until 2022 because there is roughly a minimum eight-to-ten month delay from leasing to production in onshore areas,” the EIA said in its ["short-term energy outlook."](#)

It forecasted that in 2022, the change will result in a dip of less than 100,000 barrels of crude oil per day. As of 2018, the country produced an average of nearly 11 million barrels per day of crude oil.

From: [Lefton, Amanda B](#)
To: [Anderson, Robert T](#); [Sanchez, Alexandra L](#)
Cc: [Cordalis, Daniel J](#); [Landreth, Natalie A](#)
Subject: RE: [EXTERNAL] NRDC and Earthjustice Comment letter
Date: Monday, April 19, 2021 3:08:35 PM

Thank you, Bob!

From: Anderson, Robert T <Robert.Anderson@sol.doi.gov>
Sent: Monday, April 19, 2021 3:03 PM
To: Lefton, Amanda B <Amanda.Lefton@boem.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Cc: Cordalis, Daniel J <Daniel.Cordalis@sol.doi.gov>; Landreth, Natalie A <natalie.landreth@sol.doi.gov>
Subject: FW: [EXTERNAL] NRDC and Earthjustice Comment letter
Importance: High

Amanda, Per your request.

Robert Anderson
Principal Deputy Solicitor
Department of the Interior
1849 C Street NW
Washington, D.C. 20240
(202) 208-4210

From: Chasis, Sarah <schasis@nrdc.org>
Sent: Friday, April 16, 2021 3:48 PM
To: Anderson, Robert T <Robert.Anderson@sol.doi.gov>
Subject: [EXTERNAL] NRDC and Earthjustice Comment letter
Importance: High

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Dear Bob,

I wanted to share with you the comments that NRDC and Earthjustice submitted yesterday recommending preparation of a null schedule Five-Year OCS Oil and Gas Leasing Program and cancellation of the proposed lease sales on the current Five-Year Program. These comments were

submitted in response to the Interior Department 's request for public comments to inform the interim report on the comprehensive review of the federal oil and gas program as called for in Executive Order 14008.

Please let us know if you have any questions.

Best,

SARAH CHASIS

*Senior Strategist, Oceans
Nature Program*

NATURAL RESOURCES
DEFENSE COUNCIL
40 W 20TH STREET
NEW YORK, NY 10011
T (917) 843-3840

schasis@nrdc.org
NRDC.ORG

Please save paper

From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: FW: [EXTERNAL] 4,277 Constituent Recommendations for the Comprehensive Review of the Federal Oil and Gas Program
Date: Thursday, April 15, 2021 1:57:55 PM
Attachments: [4,277 DOI Federal Oil and Gas Public Comments April15 .pdf](#)

This is going to the correct in-box too but in case you want to note the many comments....

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Kim Stevens <kim_stevens@twos.org>
Sent: Thursday, April 15, 2021 11:44 AM
To: Energy Review <energyreview@ios.doi.gov>
Cc: Kelly, Katherine P <Kate_Kelly@ios.doi.gov>; Culver, Nada L <nculver@blm.gov>; Alonso, Shantha R <shantha_alonso@ios.doi.gov>
Subject: [EXTERNAL] 4,277 Constituent Recommendations for the Comprehensive Review of the Federal Oil and Gas Program

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

April 15, 2021

Submitted via email: energyreview@ios.doi.gov

The Honorable Debra Haaland
Secretary
U.S. Department of the Interior
1849 C St. NW
Washington, D.C. 20240

Re: Constituent Recommendations for the Comprehensive Review of the Federal Oil and Gas Program

Dear Secretary Haaland:

We deeply appreciate the leadership of the Biden Administration, the Department of

the Interior (DOI), the Bureau of Land Management (BLM), and the Bureau of Ocean Energy Management (BOEM) in conducting a comprehensive review of the federal oil and gas program and pausing oil and gas leasing during the review.

We collected 4277 comments and recommendations from constituents and public lands users across the country for reforming the program to achieve critical, equitable climate solutions, as directed by Section 208 of Executive Order 14008, Tackling the Climate Crisis at Home and Abroad. These supporter comments and recommendations elevated multiple common themes that we wanted to call to your attention.

First, the urgent recognition that:

1. Climate change is one of the most universal environmental and social justice issues of our time.
2. Public lands and waters provide an immediate opportunity for the federal government to act on climate change.
3. The current federal leasing and permitting program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water.
4. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step towards fixing and aligning the current program with the administration's climate, public health and equity goals.

Second, consensus of the need to prioritize the following as you start the review process of the federal leasing system:

1. Strong, meaningful tribal consultation and commitment to tribes' treaty rights;
2. Robust and inclusive public input opportunities now and following the DOI's interim report;
3. Creating a plan for achieving pollution-free public lands and waters – starting by making them a net-zero source of emissions by 2030 – by overhauling outdated leasing and land management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and
4. Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels, and the communities that continuously suffer the greatest impact of fossil fuel pollution.

Fossil fuel companies have had oversized influence on public lands management for far too long. That must change. A diversity of people must be involved in determining what approaches the country takes to making public lands benefit all of us and our climate, especially those communities who will be most impacted by the decisions.

Thank you for the opportunity to weigh in and for continuing to prioritize having the right voices at the table throughout your review.

Kim Stevens

Campaign Manager

The Wilderness Society | The Wilderness Society Action Fund

ph 720.647.9524 | cell 313.801.3676

Pronouns (she/her/hers)

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**Tell the Biden administration:
We want public lands back from polluters**

Sign by adding your name below

For years the federal government has managed our public lands and waters in favor of polluters, implementing laws, tax breaks, and subsidies that prioritize the development of fossil fuels. With a new leader in the White House and Sec. Haaland managing our public lands, it's the perfect time to take them back from polluters and ensure they are benefiting all of us.

Our shared lands should be tackling the climate crisis, sustaining wildlife and contributing to our health and well-being. They can also help communities to equitably transition away from fossil fuel reliance and toward conservation, restoration, recreation, responsible renewable energy and other economies that are healthier and more sustainable.

Tell the Biden Administration to fix the faulty oil and gas leasing system and manage our shared lands to benefit people instead of polluters.

To: Department of Interior

Subject: Prioritize public input and pollution-free public lands during review

	Name	State	Date	Message
1	Browning, Andrew	UT	3/30/21	<p>The right to enjoy a clean home and environment extends to every man, woman, and child on the planet. Earth is the common heritage of all mankind, and a future spent in service to oil and other fossil fuels is a future where we kill our planet and imperil our own survival. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change, ease the transition. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none">- Strong, meaningful tribal consultation and commitment to tribal treaty rights;- Robust and inclusive public input opportunities now and following the DOI's interim report;- Creating a plan for achieving pollution-free public lands and waters, starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science;and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
2	Burdick, Rver	ID	3/31/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change, ease the transition. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none">- Strong, meaningful tribal consultation and commitment to tribal treaty rights;- Robust and inclusive public input opportunities now and following the DOI's interim report;- Creating a plan for achieving pollution-free public lands and waters, starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science;and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. I appreciate the willingness you have shown to forge new paths with the health of our planet. For myself the most important issues are #1 companies should be forced to clean up the mess they leave that pollutes our air, water, and... ongoing & mining, etc. #2 Here in the northwest our trees are being exported and our insane highway prices for lumber are simply unacceptable. As the burning of subsidies must stop in favor of a nonpolluting use for the material. #3 subsidies for polluters must end. These are our resources

				and we must immediately begin to protect them rather than give them away so a few can profit. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Looking forward to the progress I envision that your timeline will reveal. Thanks for making respect for water, air, & land a priority and for honoring treaties made with native peoples.
3	Guest, Kevin C	NM	3/31/21	<p>Dear Secretary Deb Haaland. My name is Kevin C. Guest/K.C. Guest. I have some monumental ideas to implement climate change. I have wanted you to hear for a while. Climate change is one of the most universal environmental and social justice issues of our time. Fossil fuels are a dangerous dying industry. There is absolutely no reason to use fossil fuels other than for manufacturing past sins. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to please seize this opportunity now. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. Renewable energy is cleaner, safer, and more profitable than fossil fuels. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. Here are my ideas: We must impose a very high carbon tax on gas vehicles. At the same time we should offer a very aggressive tax credit and price reduction on electric vehicles. I also have some ideas which will implement climate changes. Please contact me to hear them. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Creating a plan for achieving pollution-free public lands and waters by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Kevin C Guest / K.C. Guest Ph. (505) 554-8505 Email : kcguest50@gmail.com Mailing address: 4309 Mesa Grande pl S.E Albuquerque New Mexico 87108
4	Res, Erin	CO	3/31/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to please seize this opportunity now. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank

				you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
5	Brennan, Sean	OR	3/31/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change—oppose sequestering oil and gas leasing and conducting a comprehensive review of the federal leasing program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters—starting by making them a net-zero source of emissions by 2030—by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. The last administration decided economy heavily over environment. We in Oregon love our relatively clean air and water. I know this administration, like the Obama administration, will take steps towards a balanced approach. Yes people need to work, without destroying the planet.
6	Mabrouk, Mehd	CO	3/31/21	<p>You matter, not your belongings. Get out of yourself and think big. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change—oppose sequestering oil and gas leasing and conducting a comprehensive review of the federal leasing program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters—starting by making them a net-zero source of emissions by 2030—by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
7	Nelsen, Deb	CO	3/31/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change! I think that a pause on oil and gas leasing and a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank</p>

				<p>you for taking this opportunity to fix and align the current program with the administrative committee, public health and equity goals. Thanks so much!!!! As you start the review process of the federal energy system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and watersóstarting by making them a net-zero source of emissions by 2030óby overhauling outdated energy and land management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on scientific evidence; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
8	O'Dowd, Mary	NM	4/1/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate changeóease the oil, coal, and gas energy and conduct a comprehensive review of the federal energy program's architecture first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. The multi-use public land policies of the past will not work for the future!!! Thank you for taking this opportunity to fix and align the current program with the administrative committee, public health and equity goals. As you start the review process of the federal energy system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and watersóstarting by making them a net-zero source of emissions by 2030óby overhauling outdated energy and land management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on scientific evidence; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
9	STRAUHAL, MICHAEL	OR	4/1/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate changeóease the oil, coal, and gas energy and conduct a comprehensive review of the federal energy program's architecture first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. As your constituent, I look to you for taking this opportunity to fix and align the current program with the administrative committee, public health and equity goals. As you start the review process of the federal energy system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and watersóstarting by making them a net-zero source of emissions by 2030óby overhauling outdated energy and land management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on scientific evidence; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and</p>

				<p>communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. And although this might be out of your scope with the DOI, please, please look into the devastation happening in our oceans on a global scale from industrial/commercial fishing. We are destroying the main global resource that allows us to live and breathe on this planet. Without a working healthy global ocean ecosystem we cannot hope to continue living on this planet. The oceans store more carbon than land and combined and more. There are little regulations and no enforcement. It's a take what you want at whatever cost and this is a subject that ought to be headline news but little attention is being given. Any ecosystem given out are worthless due to zero guarantee of practices. We are killing more species as by catch than we are trying to harvest and making entire species go extinct with zero repercussions. Whatever you can do please do it to help protect our oceans. This is a greater climate issue than alcohol, past, and land use issues we face combined! Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
10	Dautovic, Beksa	MO	4/1/21	<p>So that I can continue enjoying God's perfect creations and generations after me, too, please listen and make the right and moral changes and act on to protect the Earth. There's only one. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change: please seize it. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters: start by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
11	Fortune, Mara	NE	4/2/21	<p>I am reaching out to you to make climate change top priority for this administration. You could be the one to make this happen. Be the leader for our future generations. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change: please seize it. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters: start by making them a net-zero source of emissions by</p>

				2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
12	Dor on, Ga e	CA	4/2/21	For a hea thy and susta nab e future C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophos that threaten our cean a r and water. Thank you for tak ng th s opportun ty to f x and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
13	Browne, Ada	NM	4/2/21	C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. There's no greater mmed ate opportun ty for the federa government to act on c mate change than by address ng the devastat on of our pub c ands. Pause o and gas eas ng and conduct a comprehens ve rev ew of the federa eas ng program now. The current program s broken and outdated, fu of ndustry handouts and oophos that threaten our cean a r and water. You can take th s opportun ty to f x and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a ust econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
14	W son, Kasey	NV	4/2/21	He o. I am the mother of two tte boys. I ove them more than anyth ng. I need them to have a future and I w fght for t. P ease fght w th me. P ease he p our beaut fu country take back tis ands from anyone who wou d exp o t for money. I beg you. Let our ch dren have a future. Thank you. Fe x and Wrenís mom C mate change s one of

				<p>the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOIís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuos y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
15	Cox, Nata e	KS	4/3/21	<p>Non-tox c hydroe ctr c ty nstead v o at ng the cean A r cean water and cean ands nternat ona nat ona tr ba codes s strong y recommended, Our pub c ands are nd re need of return ng to A r supp y areas where con ferous s grown, the standard of 42 to 56% of con ferous coverage has been v o ated and has contr buted great y to the wor dw de pandem c caus ng severa to suffer need ess y and to de, Many of our pub c ands have ser ous uran um m n ng dumps wh ch contr bute to human hea th prob ems that have been swept underneath a dep eted A r supp y, It s t me to take act on and mprove standards and behav ors mov ng away from uran um uran um m n ng and near y a cases s rad oact ve wh ch deter orates and dep etes A r supp y, There s no future n expect ng to ve through uran um m n ng waste dumps, Nor s there any future n osc at ng o fe ds b er ng m es of su fte su fate contam nat on a rborne po sons and t leads to more further terror st c behav or when chem ca umpers dump on top of th s pre-ex st ng waste. A ow ng th s k nd of behav or s very unfru tfu and s neg gent and endanger ng, therefore hydroe ctr c ty s one answer, another answer s bu d ng A r supp y by con ferous and snce we have ncreased popu at on and a very severe a r-dep et ve prob em wor dw de t s recommended to do 56 262% con ferous coverage n the cont nenta Un ted States Hawa Aaska and Un ted States of Amer ca prov nce's, Strengthen ng recyc e o programs s another answer, Instead of o fe ds do o pump and cap as t great y essens a r qua ty endangerment and so s endangerment n most cases, Stop wrongfu deve opment areas when a deve opment company w w pe out acres of trees that were p anted there by very strong car ng Amer cans to stop the spread of rad at on from bur a of numerous norgan c compounds d sbehav or of wrongfu deve opment s to be exam ned because a ot of peop e get k ed n the process or de from exposure of what s bur ed there, n most cases our pub c ands have bur a of over 100 years and needs to be eft a one for A r supp y, It s a so suggested to fnd smarter east po sonous ways for energy of e ctr c ty o and gas. Cont nu ng to strengthen east tox c east po sonous w create a future that s ess and restr ct ve whereas cont nu ng to do devastat ng cr mes w th m n ng chem ca dump ng uran um m n ng on y dep ete what s eft of m n scu e A r supp y and further threaten pub c hea th, estab sh ng stronger A r supp y programs execut ng A r supp y programs mean ng grow con ferous creates a future t ncreases a r supp y and contr butes to pub c hea th, Thank you</p>

16	Rack, Stephanie	OH	4/3/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change: ease the tax burden on oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. BGO has continued to thrive while wildlife and human land are poisoned. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters: starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
17	Simmons, Cooper	OH	4/13/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change: ease the tax burden on oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters: starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. We must act collectively and compassionately as a global community to stop the climate crisis and end a fossil fuel production, use subsidies and on using 40% depletion of our current reserves or we will exceed 1.5 degrees centigrade. Listen to the IPCC we've known the effects since at least 2008 in the report from Exxon and BP have known since the 70's. Thank you Mr. President with Compassion
18	Achenbach, Susan	VT	4/4/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands should be protected not used by polluters and those on your carbon about profits. PLEASE PROTECT PUBLIC LANDS!! Public lands and waters provide an immediate opportunity for the federal government to act on climate change: ease the tax burden on oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current</p>

				<p>program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOI s nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and waterso start ng by mak ng them a net-zero source of em ss ons by 2030oby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
19	Murphy, She a	NY	4/11/21	<p>C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. And the ONLY so ut on to th s fe-threaten ng cr s s s to cut back on the use of foss fue and the product on of foss fue s. Leas ng pub c ands for the purpose of creat ng more c mate-chang ng po ut on makes abso ute y no sense. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeo p ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOI s nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and waterso start ng by mak ng them a net-zero source of em ss ons by 2030oby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
20	We ss, Susan	MD	4/9/21	<p>C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. We don't benef t from foss fue extract on, wh ch on y exacerbates c mate change. The federa government shou d do everyth ng poss b e to pro mote renewab e energy sources and shou d stop eas ng any federa ands to o , gas, and coa extract on compan es. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeo p ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and</p>

				<p>following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
21	Foster, Victor a	VA	4/7/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. I am hoping you will get cattle and sheep off of public lands and end the horrific roundups of our wild horses and burros. Between water being polluted by fracking and these ranchers, things are dire. Public lands and waters provide an immediate opportunity for the federal government to act on climate change peacefully. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
22	Nau, Susan	ID	4/6/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change peacefully. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Returning our National Parks to the state they were in, removing equipment from Trump's lease program. - Immediately remove the cattle grazing on Yellowstone and, especially those that are grazing right where there is a Female Grizzly who has cubs every year and is part of the project to help increase the endangered Grizzly population, if she hasn't been shot already by the rancher. - Immediately stop logging in the Tongass National Forest by banning logging companies Trump gave leases to. This is one of the most important O2/CO2 filters in the U.S. - Please get a hold of the oil drilling & SONIC equipment, which is causing harm to the marine life that use echo or sonar communication, out of Alaska's Denali Wildlife Refuge & anything near the Old Pebbles mine. The Salmon run that is in Bristol Bay is a conservation miracle. Any disruption will be a catastrophe to Bristol Bay. - Before removing any</p>

				<p>dam's and removing a source of clean energy (electricity) look at moving the Japanese gillnetting trawlers back from the mouth of the Coumb River, way back. They wait to catch salmon in the nets which decreases the number of salmon that are going and coming back. Gillnetting should be banned in that area, especially in that area, it's a lot of other sea life. - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
23	Wright, Wendy	WA	4/10/21	<p>As a taxpayer, I am tired of paying to clean up toxic waste dumps and other polluted areas left behind when companies leave. Corporations must be held liable for clean-up costs AND NOT pass the charges on to the customers. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to ease sea level rise. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
24	Reynolds, Mara	WA	4/8/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to ease sea level rise. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the</p>

				<p>c mate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Quoting Henry David Thoreau: wilderness is the preservation of the world, and our country. Sincerely, Mara C Reynolds PO Box 62 Stevenson, WA 98648 ReynoldsMara1@gmail.com</p>
25	Kraty, Susanne	HI	4/5/21	<p>*Thank you! Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to ease sea level rise. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
26	Jay, Rebecca	OR	4/6/21	<p>Extracts from corporations have long enjoyed an essentially free ride in the West, and it's time to change the picture and concentrate on preserving our country and its resources such as clean air and clean water, allowing flora and fauna to recover. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to ease sea level rise. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>

27	Loesch, Mary Lou	MD	4/11/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change—pause sea level rise, pause oil and gas leasing and conduct a comprehensive review of the federal leasing program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters—start by making them a net-zero source of emissions by 2030—by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. PUBLIC LANDS ARE FOR THE PUBLIC, NOT PRIVATE BUSINESSES!!
28	Zachry, Sherry	MA	4/3/21	<p>Public lands are for us all. We all need space, clean air and room to align our hearts and minds. To give us peace and calm. Please protect our open spaces for us all and for generations of people and animals to come. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change—pause sea level rise, pause oil and gas leasing and conduct a comprehensive review of the federal leasing program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters—start by making them a net-zero source of emissions by 2030—by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
29	Ray, Jay	CA	4/13/21	<p>Climate change is one of the most universal environmental and social justice issues of our time! Public lands and waters provide an immediate opportunity for the federal government to act on climate change—pause sea level rise, pause oil and gas leasing and conduct a comprehensive review of the federal leasing program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p>

				<p>- Strong, meaningful trade consultation and commitment to trade treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real estate costs, and ensuring decisions are based on real estate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
30	Jackson, Helen	MD	4/6/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. We should NOT allow companies to use and pollute our public lands. Public lands and waters provide an immediate opportunity for the federal government to act on climate change immediately. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful trade consultation and commitment to trade treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real estate costs, and ensuring decisions are based on real estate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
31	Kung, Marie	MI	4/11/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change immediately. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful trade consultation and commitment to trade treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real estate costs, and ensuring decisions are based on real estate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>

				review. THIS SHOULD HAVE BEEN THE FIRST THING BIDEN DID. NOW DO THE RIGHT THINK AND PROTECT OUR PUBLIC LANDS STOP OIL EXPLORATION CARBON TAX IT OUT OF EXISTENCE.
32	Bailey-Gregerich, Ker	WA	4/2/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change, ease the transition. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Quit leasing wild horse & burro HMA's to cattle that are reserved for American wild horses. Stop rounding up our mustangs - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters, starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
33	Rivas, Mary	NJ	4/9/21	Please listen to the American people. We want our public lands to be preserved along with the Wildlife. Which inhabit them for future generations. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change, ease the transition. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters, starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
34	Tate, Tricia	CA	4/8/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change, ease the transition. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with

				<p>the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, please pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOIís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decou es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. I wou d a so ke see po uters g ven mean ngfu fnes that pay for the true cost of cean up and fe t me oss for a mpacted. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
35	Warren, Rah ma	CA	4/9/21	<p>The c mate cr s s s one the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, please pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOIís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decou es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
36	Herron, James	CA	4/9/21	<p>Pub c ands shou d be he d, as they are, for the pub c to access and or saved from deve opment n order to protect them from exp o tat on by those seek ng prof t over a ese. C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, please pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOIís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a ust econom c trans t on that decou es state budgets and

				soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
37	Harneck, Ker	IL	4/10/21	Th s and be ongs to the w d HORSES ..PLEASE HELP THEM & FREE THEM ALL THAT ARE IN HOLDING PENS .. THAT IS CRUELTY TO ANIMAL'S ..I THOUGHT IT WAS A aw now ..the horses are supposed to be PROTECTED & C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a ust econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
38	Les e, Kathy	FL	4/13/21	C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. SAVE THE TONGASS! Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
39	Taft, Sarah	NH	4/12/21	C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry

				<p>handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal energy system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful trade consultation and commitment to trade treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. I wouldn't bother sending this if it didn't matter
40	Gass, Leslie	AZ	4/2/21	<p>Protect Oak Flat! Protect our water! Protect our people and communities! Protect Sacred sites and religious freedom! Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change immediately. Pausing oil and gas energy and conducting a comprehensive review of the federal energy program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal energy system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful trade consultation and commitment to trade treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
41	Wason, Rebecca	KY	4/13/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change immediately. Pausing oil and gas energy and conducting a comprehensive review of the federal energy program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal energy system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful trade consultation and commitment to trade treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that

				decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
42	Johnson, Teresa	MD	4/3/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize it. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Regards Teresa Johnson Kensington MD 20895
43	Gray, Heather	MA	4/4/21	Climate change is one of the most universal environmental and social justice issues of our time. It affects every person, no exceptions. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize it. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
44	Smith, Reba	NC	4/4/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize it. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with

				<p>the adm n strat onis c mate, pub c hea th and equ ty goa s. As so, refute ranchersí r ghts of pub c graz ng, not a ow ng exp o tat on of pub c ands away from the nat ve w d fe as the r bona fde her tage. Please protect the w d fe and the w d ands so that Nature can rec a m ts r ghtfu p ace n our country and n the m nds and hearts of the peop e. We need protect on for the san ty and safety of Nature and nat ve spec es to rec a m our own safety and san ty n th s extreme runaway soc ety. As you start the rev ew process of the federa eas ng system, please pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun t es now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun t es that depend on foss fue s and the commun t es that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
45	Z ese, Marc	MD	4/5/21	<p>C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Our spec es s the worst spec es on the p anet! But we can get better! Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóplease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oopho es that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, please pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun t es now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a ust econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun t es that depend on foss fue s and the commun t es that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
46	Peronace, Donna	MA	4/8/21	<p>C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóplease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oopho es that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, please pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Restor ng protect ons to Nat ona Monuments and W d fe Refuges that the Trump adm n strat on removed - Bears Ears and Grand Sta rcase Esca ante and the Arct c Nat ona W d fe Refuge; - Robust and nc us ve pub c nput opportun t es now and fo ow ng the</p>

				<p>DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
47	Medley, Elizabeth	OR	4/2/21	<p>Climate change is one of the most crucial universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to ease the transition, while we make the largest impact. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking advantage of this opportunity to update the current program and align it with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
48	Timponi, Tracey	CA	4/12/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to ease the transition. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. And while you are at it get welfare ranchers off our public lands too.</p>

49	Porter, Judith	NC	4/5/21	Climate change is one of the most environmental and social justice issues of our time. Public lands and waters provide an opportunity for the federal government to act on climate change immediately. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
50	Nasho, John	CA	4/8/21	Global warming is one of the most universal environmental and social justice issues of our time. Pausing oil and gas leasing on public lands and waters provides an immediate opportunity for the federal government to act on global warming. Also, please immediately conduct a comprehensive review of the federal leasing program. The current program is broken and outdated. It is full of industry handouts and loopholes, that threaten our clean air and water. Thank you for taking the opportunity to fix and align the current program with the administration's climate, public health, and equity goals. As you start the review process of the federal leasing system, please prioritize the following. - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan to achieve pollution-free public lands and waters, that includes making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the environment, human health, and society at the table throughout your review.
51	Arana, Barb	FL	4/4/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change immediately. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and

				and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. We desperately need to protect our land and environment. Protect a puzzle and take a part of puzzle away. What happens starts with start to collapse. Environment and land with a so. Protect protect
52	cassady, kat	MI	4/11/21	Climate change is one of the most universal environmental and social justice issues of our time. The time to do something good for our planet. BEFORE it's too late. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize the time. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters; starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
53	Hatton, Jane	WA	4/6/21	Get out of the oil and gas business! Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize the time. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters; starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
54	O'Reilly, Maureen	NM	4/6/21	The Earth belongs to no one, and we are meant to live in Harmony with Her as stewards. Stop turning Her resources into commodities for the

				<p>h ghest b dder wh e destroy ng Her L fe and Beauty. She s far more va uab e who e, than the pr ce of Her parts. Wake up! C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
55	Roche, Kath een	OR	4/2/21	<p>C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. They shou d be used to reduce our carbon footpr nt. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a ust econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
56	McDonough, Nancy	OR	4/8/21	<p>P ease know how mportant th s s to regu ar c t zens e myse f. We tru y care. PLEASE LISTEN. C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and</p>

				<p>nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
57	Busse s, Kath een	PA	4/10/21	<p>C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and sources prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. *Water s prec ous, and the usurp ng of cean water by compan es for bott ng and se ng s wrong. *Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
58	Mod n, Ke ey	TN	4/7/21	<p>I wou d ke to see Good Stewardsh p of the and, a r and water become the foremost thought n th s adm n strat on. Our so becomes more dep eted each year w th our terr b e farm ng pract ces. Those g ant turb nes and other mach nes used to t and spray the so pack the so to a po nt that the so cannot recuperate from. Then we f t w th tox c chem ca s and for what.....weeds? Those weeds a so serve a purpose. We have gotten so far from hea thy use of the and, water and a r that t s next to mposs b e to not be phys ca y n our soc ety as t s. We have a owed so many compan es to dump a of the r unwanted waste anywhere and everywhere unt there are no pr st ne paces eft. The way we consume our resources s comp ete y unsusta nab e and t s eav ng our best resources....so , water, a r....po uted to the po nt that some ct es have tox c water, others have ac d ran and no one has good so anymore. P ease Pres dent B den, I'd ke to see th s adm n strat on take a stand! I'd ke to see a government that doesn't just a ow compan es to become r cher wh e po ut ng more and more around them. I'd ke to see some accountab ty where the use of th s Earth's resources are concerned. I'd ke to see the government subs d ze bu d ng on a ready used space and pena ze those that wou d try to buy new, current y green space and. I'm t red of see ng my green spaces d sappear to a str p ma that won't be thr v ng n 5 years or to more warehouse space for who knows what. Tennessee s a beaut fu state and I'd ke t to rema n that way, but everywhere I go anymore I see p pes com ng out of the ground that are taps for natura gas. I know we need gas and ectr c ty to keep mov ng as a country,</p>

				<p>but I would just like to see more penalties on waste of animals including building a strip mall that is needed spread over the new one the just built half a mile down the road. This blatant disregard for land use has got to stop! I mean fracking, I mean industrial farming and industrial animal husbandry. A lot of these things have allowed for us to get so far away from what is healthy to put inside of our bodies that our bodies no longer recognize them as food or nutrition, but instead attacks us on an internal level as inflammation and allergens. And for crying out loud why is Roundup still legal in this country at all? It is inside of our food, we cannot get away from it unless the government does something to stop the farmers that use it and the companies that produce it. DO SOMETHING, I beg you if you want the people of this country to regain their health, to be able to cognitively understand the changes that we need to make for this earth and to be physically able to do our part you have to DO SOMETHING! I'm so tired of being so sick I cannot work and often I'm too tired to even cook for my husband. Everything in this life is connected and to say that it isn't, you understand nothing.</p>
59	Rottmayer, Thomas	OH	4/7/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change - please seize it. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters - starting by making them a net-zero source of emissions by 2030 - by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
60	Trowbridge-Judge	KS	4/3/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change - please seize it. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. It is key to move to the second step of limiting oil and gas production. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. Our move into more natural power such as wind and solar energy are vital. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters - starting by making them a net-zero source of emissions by 2030 - by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic

				trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun t es that depend on foss fue s and the commun t es that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportunit y to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
61	W de, Tom	MT	4/12/21	Pub c ands and waters prov de an mmed ate opportunit y for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. If eas es cont nue make them ref ect market pr ces The current program s broken and outdated, fu of ndustry handouts and oopho es that threaten our cean a r and water. Thank you for tak ng th s opportunit y to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportunit es now and fo ow ng the DOIís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a ust econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun t es that depend on foss fue s and the commun t es that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportunit y to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
62	Curt s, Janet	NV	4/6/21	C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportunit y for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oopho es that threaten our cean a r and water. Thank you for tak ng th s opportunit y to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportunit es now and fo ow ng the DOIís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun t es that depend on foss fue s and the commun t es that cont nuous y suffer the greatest mpact of foss fue po ut on. STOP BLMS ILLEGAL STEALING N KILLING OUR HORSES N BURROS THE DIE EVERY 30 SECONDS. PLS STOP THEM.NOW Thank you for the opportunit y to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
63	Curt s, Janet	NV	4/8/21	C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. MOST IMPORTANT. OUR HORSES GOING EXTINCT! NO MORE ROUNDUPS. COLO IS ABOUT TO KILL MASSIVE AMOUNT OF WILDLIFE. PLS GIVE THEM THIER HMA BACK. PLS WE BEG FOR DECADES. ALMOST GONE. N CALIFORNIAS POISONING BIG CATS. LIVES ARE AT RISK EVERY MINUTE. PLS SAVE OUR LAST HORSE!!!! BLM MUST BE

				<p>DISBANDED ASAP.PLS HURRY!! ITS SO GROSS N SO CRUEL. BEEF IS HORSEMEAT!! PLS PLS PLS END THIS AND ALL FERTILITY CONTROL!!!!# Pub c ands and waters provide an immediate opportunity for the federal government to act on climate change ease the t. Pausing oil and gas easing and conducting a comprehensive review of the federal easing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated easing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
64	Curtis, Janet	NV	4/5/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Please save our last horses! Put them back! Haha and can end the mega cruel b m Pub c ands and waters provide an immediate opportunity for the federal government to act on climate change ease the t. Pausing oil and gas easing and conducting a comprehensive review of the federal easing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated easing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
65	Duggan, Jack	OR	4/10/21	<p>I see public lands as a bank account for a citizens. Unfortunately, the government charged with managing that and has reduced the balance in that account. Instead of figuring out how to best utilize the interest on the account, special interests have been taking away from the principal. Now we face the results of eroded land, polluted air and water, and an extreme widening of the economy between haves and have nots. If we are to fulfill the founding principles of our country, we must take back our public lands and re-dedicate them to highest and best use. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change ease the t. Pausing oil and gas easing and conducting a</p>

				<p>comprehensive review of the federal eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportunit y to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, please pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportunit es now and fo ow ng the DOI s nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and waters o start ng by mak ng them a net-zero source of em ss ons by 2030 o by overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a ust econom c trans t on that decou es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportunit y to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
66	Ek und, G enn	WA	4/5/21	<p>C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportunit y for the federa government to act on c mate change o please se ze t. Paus ng o and gas eas ng and conduct ng a comprehensive rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportunit y to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, please pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportunit es now and fo ow ng the DOI s nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and waters o start ng by mak ng them a net-zero source of em ss ons by 2030 o by overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decou es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportunit y to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
67	D d ne, Chr s	CO	4/6/21	<p>We know that C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. WE MUST ACT NOW. Pub c ands and waters prov de an mmed ate opportunit y for the federa government to act on c mate change o PLEASE, please se ze t. Paus ng o and gas eas ng and conduct ng a comprehensive rev ew of the federa eas ng program s a cr t ca frst step. The current program s VERY BROKEN AND OUTDATED, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportunit y to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, please pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportunit es now and fo ow ng the DOI s nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and waters o start ng by mak ng them a net-zero source of em ss ons by 2030 o by overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence;

				and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you VERY MUCH for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
68	Bacher, Bobbe	IL	4/11/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please see the following and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
69	Terry, Tere e	CA	4/3/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please see the following and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. We have a planet to save, and there is not a moment to lose. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
70	Wanenmacher, Erka	NM	4/4/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please see the following and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry

				<p>handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administrative committee, public health and equity goals. As you start the review process of the federal easement system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated easement and management policies, charging oil and gas companies for their committee costs, and ensuring decisions are based on committee science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Our public lands belong to not just the energy industry and private ranchers, but to the creatures and plants for whom this is home, and to Americans who value this diversity. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
71	Gentz, Don	TX	4/8/21	<p>Public lands are a treasure that cannot be replaced, and should not be jeopardized for short-term profits. Committee change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change opportunities. Pausing oil and gas easement and conducting a comprehensive review of the federal easement program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administrative committee, public health and equity goals. As you start the review process of the federal easement system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated easement and management policies, charging oil and gas companies for their committee costs, and ensuring decisions are based on committee science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
72	Anderson, Christina	NM	4/6/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change opportunities. Pausing oil and gas easement and conducting a comprehensive review of the federal easement program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administrative committee, public health and equity goals. As you start the review process of the federal easement system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated easement and management policies, charging oil and gas companies for their committee costs, and ensuring decisions are based on committee science;

				and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. I am so glad and thankful that this country is out of the hands of a narcissist madman. Let's keep it that way!
73	redwine, maryn	OR	4/11/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change, ease the transition. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters, starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. I may have a ready signed/sent this petition but it is important to me and imperative that polluters are not allowed on PUBLIC land. The land belongs to the people, not corporations. And, regardless of the Supreme Court's absurd ruling, corporations are NOT people. Period.
74	Fagan, Beverly	IL	4/5/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change, ease the transition. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please be sure to prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters, starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
75	Emerson, Judith	TX	4/3/21	Public lands are for the enjoyment of We The People and for Preserving Our Natural Environment For Our Future. Our Future is Severely Endangered Right Now by the Focus of Climate Change!!!

				<p>Yes, Climate Change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change: pause oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters: start by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
76	Trenary, Alan Trenary	KS	4/6/21	<p>Plant Industrial Hemp & produce Biodiesel.</p> <p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change: pause oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters: start by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
77	McKeith, David	WI	4/2/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change: pause oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters: start by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.

				<p>po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a ust econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. We need to tax or f ne these corporat ons destroy ng uor pub c and and waterways! Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
78	K ng, Caro yn	AZ	4/5/21	<p>For future generat ons: C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, please pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOIís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
79	Norman, L sa	AL	4/13/21	<p>C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, please pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOIís nter m report; -End the assau t on our 'protected' w d horses and other nat ve w d fe by the catt e ndustry and extract on sts. Invest gate the corrupt on n the BLM W d Horse & Burro program and the d sappearance of thousands of w d horses from the r ega doma n. (FOIA DOCUMENTS show that LTH ho d ng fac tes on paper do not even ex st.) - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng (revok ng graz ng perm ts per FCR's to ensure thr v ng herds of w d horses on THEIR LEGAL HMA's & HA's) and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a ust econom c trans t on that decoup es state budgets and soc a serv ces</p>

				from fossil fuel revenues. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
80	Byrne, Dennis	NY	4/3/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please see the following and gas leasing and conducting a comprehensive review of the federal leasing program as a critical first step. Sadly the current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
81	Rechner, Diane	FL	4/9/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please see the following and gas leasing and conducting a comprehensive review of the federal leasing program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. STOP ALL ROUNDUPS OF WILD HORSES AND BURROS. PUT A MORATORIUM ON THE BLM AND FOREST SERVICE ASAP. THE BLM NEEDS A TOTAL OVERHAUL.
82	RANDOMON, JOANNE	UT	4/9/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please see the following and gas leasing and conducting a comprehensive review of the federal leasing program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:

				<p>- Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and watersóstarting by making them a net-zero source of emissions by 2030óby overhauling outdated leasing and management policies, charging oil and gas companies for the real estate costs, and ensuring decisions are based on real estate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. PLEASE SAVE OUR PUBLIC LANDS!</p>
83	Haines, Carolyn	AL	4/8/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Please, please save our wild horses and burros and wild creatures and lands from the aggressive rape perpetrated by the Trump administration. The horses need your help now. The land deserves better stewardship. Public lands and waters provide an immediate opportunity for the federal government to act on climate changeóplease seize it. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and watersóstarting by making them a net-zero source of emissions by 2030óby overhauling outdated leasing and management policies, charging oil and gas companies for the real estate costs, and ensuring decisions are based on real estate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
84	Roberts, Sarah	NJ	4/4/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Our public lands should be part of the solution, not part of the problem! Public lands and waters provide an immediate opportunity for the federal government to act on climate changeóplease seize it. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and watersóstarting by making them a net-zero source of emissions by 2030óby overhauling outdated leasing and management policies, charging oil and gas companies for the real estate costs, and ensuring decisions are based on real estate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that</p>

				depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
85	Way, Janet	WA	4/3/21	Please restore Bears Ears, Escalante and other parks and monuments that were reduced by Trump Administration! Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change opportunities. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
86	Norme, Jo Anne	MI	4/13/21	Finally, we have people who represent the interests of this and of ours - including oversight of PUBLIC LANDS. Please remember our wild horses and burros plus climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change opportunities. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
87	Pettyjohn, Jim	OR	4/9/21	Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step.
88	Ahn, Sharon	PA	4/13/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change opportunities. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first

				<p>step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal energy system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. This matter is really important to me. This matter needs a good review. The last administration didn't care about Climate change. They just wanted what they or cronies could profit from the situation. Big Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
89	A ton, Lee	MA	4/5/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to ease sea level rise. Pausing oil and gas energy and conducting a comprehensive review of the federal energy program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal energy system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Etch the new legs at on in stone.
90	Granato, Linda	PA	4/3/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to ease sea level rise. Pausing oil and gas energy and conducting a comprehensive review of the federal energy program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal energy system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science;

				<p>c mate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. I believe the ranching leases must be stopped and better controlled as these animals deplete the land and water. This is a real problem for the environment. A real problem for the ecosystem in these locations and to the wild horses and burros on our public lands! I would like to see you call for a multi-restoration roundups immediately and keep it that way to have a look at how a new, updated plan can do better!! Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
91	Kohnert, Christine	WA	4/8/21	<p>The destruction of public lands for the profits of a few has disturbed me a great deal for many years. We are running out of time to deal with the climate crisis. Fix this now. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Pause oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
92	Freeman, Beth Jane	NY	4/4/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Pause oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to</p>

				<p>weigh in and for prioritizing the right voices at the table throughout your review. I know we can count on you to protect the land. I was so glad that you were confirmed. The polluters are now on notice with you running things.</p>
93	Aiken, Jeff	PA	4/5/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please see the following and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Some of my best experiences took place in the wild places that are included in the public lands that belong to the people of the USA. Native Americans ceded to the US government must be dedicated to the next seven generations. I am so glad for a new opportunity to save great and special places. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
94	Vazquez, Myrna	IN	4/9/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please see the following and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. <p>Please do what is right to separate the needs of a healthy environment from the fossil fuels industry. A healthy environment that is for the people and keeps the people healthy!!! That is the American Dream.</p> <p>Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>

95	Egan, Veronica	NM	4/10/21	<p>As one who has lived between these two Monuments for years,, I can vouch for the extraordinary beauty and fragility. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change peacefully. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
96	Kane, Betty	CT	4/11/21	<p>One of the reasons I voted for Biden was to get our public lands back and start respecting the land and waterways and the wildlife that lives within it. What has concerned me most is the lack of respect and the exclusion of our American Indian communities in the decisions that directly affect them. I believe this petition addresses those concerns. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change peacefully. Pausing oil and gas leasing and conducting a directly effective comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
97	Lopez, Ma	HI	4/3/21	<p>Please pause oil and gas leasing on public lands and conduct a comprehensive review of the federal leasing program. The current program is full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and</p>

				<p>nc us ve pub c nput opportun tes now and fo ow ng the DOLis nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate science; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
98	Donne y, Russe	MD	4/9/21	<p>C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLis nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate science; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew. <p>We must cease and des t the Corporate takeover of Pub c Property Land Assets l our Nat on. Our and s for the Peop e of th s great Nat on; NOT an OPEN MARKET for th rd party operators of ndustry !!! If the rate of degradat on and despo ng cont nues Status Quo; then; what egacy are we eav ng for a current and future generat ons of fe !!! We are d gg ng a grave for those we w beh nd us ! A the money n the wor d can't rep ace what we are tak ng;and; the rate at wh ch we are burn ng thru our Natura Resources !!! Our co ect ve respectfu y; adamant y; and reso ute y mp ore th s Adm n strat on to app y fores ght for a forthcom ng future generat ons of a fe by dec d ng to we gh on the s de of a hea thy chance for cont nuat on, w th bounteous and pro f c resources to ga nfu y susta n ba anced env rons !!! What th s honored pane dec des now; w d cate the fate for a whom fo ow. P ease grant the g ft of fe; not progress !!!</p>
99	Kre , June	MD	4/3/21	<p>C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLis nter m report; - Creat ng a p an for ach ev ng

				<p>po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a ust econom c trans t on that decou es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. I hope you w do a you can to nc ude the pub c and reduce po ut on dur ng the rev ew process. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
100	Kre , June	MD	4/6/21	<p>C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decou es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. I hope you w do a you can to stop po ut on and to enhance pub c enjoyment of pub c ands. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
101	Pe ffer, Anne	MN	4/6/21	<p>C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a ust econom c trans t on that decou es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. - Create p ans to cean up and restore these ands, fnance them, create obs do ng them. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.

102	Pfeffer, Anne	MN	4/4/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change—opportunity that is being lost. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters—starting by making them a net-zero source of emissions by 2030—by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution—creating climate friendly jobs in cleaning up and restoring old workplaces. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
103	Bynum, Vick	CO	4/13/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change—opportunity that is being lost. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. It demonstrates over and over again that our priorities are to benefit the already wealthy oil and gas industries with subsidies at the expense of the public's health, wealth (public land destruction and public taxpayers' restoration of these lands—toxic sites), our planet's air, water, wildlife, and natural resources. The people most affected by this are the native Americans that are constantly told they need to get off the reservation and don't deserve respect or clean water/clean air. This disregard for minorities in this country are clearly expressed in the lack of environmental justice! Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters—starting by making them a net-zero source of emissions by 2030—by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
104	Henson, Scott	KS	4/3/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change—opportunity that is being lost. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first</p>

				<p>step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Thank you for bringing integrity and decency back to the federal government.
105	Gaspar, L z	WA	4/4/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change peacefully. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. Public lands are among the few places where it's possible (any more) to have a true immersion in Nature. Please don't allow them to be despoiled. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
106	Mer, Mary	GA	4/2/21	<p>So thank you that now we have leadership that cares about our air, water, and protecting wild places and creatures. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change peacefully. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by

				2030óby overhau ng outdated eas ng and and management po ces, charging o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
107	Rush, Mo y	PA	4/3/21	T me to end our add ct on to foss fue s. C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charging o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
108	Severson, Marc and Susan	AZ	4/12/21	We must be stewards of the Earth, there s no p anet B! C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charging o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
109	Keenan, Thomas	FL	4/6/21	C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a

				<p>comprehensive review of the federal easement program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easement system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated easement and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Our current program is broken, but it can be fixed. Please do what is right for the people and not for the corporations.
110	Gray, Pam	WA	4/10/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Why is there no action? The oil corporations own the government, including you. But they are a dead end for the nation's planet. You can do something. Will you stand up to them? Will you let the future on this warming planet, as ecosystems fall apart around us? Public lands and waters provide an immediate opportunity for the federal government to act on climate change immediately. Pausing oil and gas easement and conducting a comprehensive review of the federal easement program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easement system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated easement and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
111	Ketter, Heidi	VA	4/9/21	<p>I am a climate change voter. Climate and preservation of wilderness habitats are key issues for me. It's time we protect wild spaces from polluters. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change immediately. Pausing oil and gas easement and conducting a comprehensive review of the federal easement program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easement system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and

				<p>following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
112	Campeas, Janet	NJ	4/4/21	<p>Climate change is one of the most universal environmental and social justice issues. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administrative climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
113	James, Vicky	CA	4/14/21	<p>I agree with the statement below, with one caveat... This is PUBLIC land, OUR land, TRIBAL land in many cases, and it shouldn't be for sale or lease to the highest bidder!! I want my young grandkids to be able to enjoy what has been set aside... I want THEIR kids to be able to enjoy it. The polluters need to be removed from PUBLIC land, and required to clean up the sites before they go. And any future decisions on uses that aren't in the public interest need to be decided by the public and tribal leaders, NOT politicians whose pockets are lined by those same polluters. The same should hold true to any upstream or adjacent projects that industrial polluters seek permits for. I trust that Sec. Haaland will make decisions based on science and the environment. ***** Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize it. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administrative climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource science; and - Creating a plan to achieve a just economic transition that decouples state budgets and</p>

				soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
114	Lawson, Char es	MO	4/8/21	<p>Char es C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
115	W ams, Babs	WA	4/4/21	<p>I am a const tuent and I strong y support tak ng back our ands, p fered away by our former Pres dent. C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a ust econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
116	M er, L nda	AZ	4/10/21	<p>These are OUR PUBLIC ands and shou d never have been open to dr ng, ogg ng, or m n ng. The greedy repub cans are on y concerned w th mak ng money and have no nterest n protect ng our ands. They do not be eve that c mate change s rea and cou d not care ss how much damage they cause to the env ronment. TAKE back our PUBLIC ands! C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate</p>

				changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportunit y to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportunit es now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportunit y to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
117	Stee e, Patr c a	DE	4/2/21	Take back our pub c ands! They are our nher tance
118	Wh te, Theresa	MO	4/3/21	These ands have to be g ven back. C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportunit y for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportunit y to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportunit es now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportunit y to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
119	Wh te, Theresa	MO	4/4/21	G ve the and back to the Nat ve Amer cans. C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportunit y for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportunit y to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportunit es now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces,

				<p>charging oil and gas companies for the resource costs, and ensuring decisions are based on resource scarcity; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
120	White, Theresa	MO	4/3/21	<p>These lands have to be given back to a NATIVE AMERICANS. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to ease the transition. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource scarcity; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
121	Cont, Carolyn	CA	4/13/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to ease the transition. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource scarcity; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. DO NO MORE HARM Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
122	Bering, Lyn	IN	4/11/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to ease the transition. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first</p>

				<p>step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportunit y to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportunit es now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
123	eames, robert	NC	4/6/21	<p>Save the p anet from the peop e. Do the r ght th ng. C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportunit y for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportunit y to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportunit es now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportunit y to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
124	Ga o, L nda	OH	4/9/21	<p>C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportunit y for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportunit y to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportunit es now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that

				depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. We have for too long used our precious funds to fill the pockets of the rich. Now is the time to act! Our planet suffers. Our Children and Grandchildren will suffer immensely if we don't do something now. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
125	Battiste, Mark	MN	4/13/21	Climate change is one of the most urgent and universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize it. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
126	Ringquist, Marion	NY	4/7/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize it. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. We have a unique opportunity right now to correct some of the atrocities we witnessed over the past few years that continue today. Please give this opportunity careful and meaningful consideration. Once the lands, the animals, the plants, the pristine waters, the environment are destroyed, we will not be able to restore them. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
127	Lynch, Menda	CA	4/10/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an

				<p>immediate opportunity for the federal government to act on climate change opportunities. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Godspeed.
128	O'Brien, Kathy	CA	4/13/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change opportunities. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. These Corporate Oil Barons are turning Our Country into a Waste and a force for Greed and Profit. Enough! Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
129	Johnson, E a	PA	4/5/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change opportunities. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and

				and management policies, charging oil and gas companies for the real costs, and ensuring decisions are based on real science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. -Keeping our world safe, fair, and water safe. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
130	Cuncus, V	IL	4/10/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real costs, and ensuring decisions are based on real science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Please do what's right for we the people.
131	Dea, Robert	MA	4/9/21	Sincere y! Believe it, Do it! Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real costs, and ensuring decisions are based on real science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
132	Hennig, Christina	MN	4/10/21	Climate change is one of the most universal environmental and social justice issues of our time. OUR public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry

				<p>handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easement system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated easement and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
133	Regen, Grace	IN	4/12/21	<p>Please take back and that belongs to The People no corporations that do not take care of land and people and wildlife. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change immediately.</p> <p>Pausing oil and gas easement and conducting a comprehensive review of the federal easement program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easement system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated easement and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
134	cemmey, Elizabeth	MA	4/6/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change immediately.</p> <p>Pausing oil and gas easement and conducting a comprehensive review of the federal easement program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easement system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated easement and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues

				and prortzes the nput and needs of workers and communtes that depend on foss fue s and the communtes that contnuous y suffer the greatest mpect of foss fue po ut on. Serous y we need to protect our frag e ecosystems and w d fe. We need to respect nd genous soveregn and a ong w th our pub c ands. We are stewards of our wor d and yet we cont nue to d sregard that we are connected and part of th s p anet. If we do not honor that wh ch g ves fe and respect a the fe nba nce we woose ours. Our re at onsh p w th the earth s rec proca , we w get what we g ve. Let's start w th tru y protect ng our pub c ands and soveregn ands. Thank you for the opportun ty to we gh n and for pr ort z ng the rght vo ces at the tab e throughout your rev ew. S ncere y E zabeth C emmey 175 Essex Street Mansf e d Ma 02048
135	Str nger, Donna	NY	4/4/21	C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeo p ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr ort ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLis nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and waterso start ng by mak ng them a net-zero source of em ss ons by 2030oby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decou es state budgets and soc a serv ces from foss fue revenues and pr ort zes the nput and needs of workers and communtes that depend on foss fue s and the communtes that contnuous y suffer the greatest mpect of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr ort z ng the rght vo ces at the tab e throughout your rev ew. I hope your dec s on w favor your grandch dren and m ne apprec at ng and en oy ng the beauty and benef ts of our pub c ands for generat ons to come. Thank you.
136	Str nger, Donna	NY	4/12/21	C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeo p ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr ort ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLis nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and waterso start ng by mak ng them a net-zero source of em ss ons by 2030oby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decou es state budgets and soc a serv ces from foss fue revenues and pr ort zes the nput and needs of workers and communtes that depend on foss fue s and the communtes that contnuous y suffer the greatest mpect of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr ort z ng the rght vo ces at the tab e throughout your

				<p>rev ew. Our grandch dren deserve to enjoy these and n cond tions s m ar to what they were dur ng our ch dhood. Thank you.</p>
137	Roussey, Ga Gonza ez	FL	4/13/21	<p>C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of industry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOIís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew. P ease, reverse the atroc tes Trump has done to destroy our panet. He s a about, 'What's n t for h m'!
138	Krchner, Janet	DE	4/7/21	<p>C mate change s one of THE MOST UNIVERSAL env ronmenta and soc a just ce ssues of our t me. ESTABLISH & ENFORCE t ght tter ng aws, espec a y w th n 100 m es of ALL watersheds, waterways, tr butar es, and make t a nat ona aw. ITS NOT OK TO LITTER IN ANY STATE!! The back roads of Southern DELAWARE are AWFUL w th tter! I was a tter-p cker-upper n Pennsy van a before I moved here n February. Thereís bad tter everywhere! LETS STOP LITTER! R E C Y C L E the bott es and cans correct y! BLAH B ah, b ahhhhhhh. CREATE INCENTIVE TO CLEAN UP! REWARD! Reward for return of bott es and cans. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of industry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOIís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management IN THE ENTIRE UNITED STATES!! Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
139	Tremayne, Adran	NY	4/12/21	<p>The pub c ands be ong to a of us, and need to be adm n stered n such a way as to benef t the pub c. For far too ong they have been used as 'freeb es' to benef t po t c ans and the r cron es. It s past t me for the pub c to take them back and beg n us ng them n mora y and eth ca y respons b e ways. C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken</p>

				<p>and outdated, fu of industry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportunit y to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportunit es now and fo ow ng the DOI s nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportunit y to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
140	Musgrove, Jeanne	SC	4/14/21	<p>C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Protect ng pub c ands and waters prov de an mmed ate opportunit y for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step and s ong overdue. The current program s broken and outdated, fu of industry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportunit y to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. You have my tota support and apprec at on for tack ng th s very crt ca ssue for our future. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportunit es now and fo ow ng the DOI s nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportunit y to we gh n on an ssue wh ch s so very mportant to me and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
141	Co yer, Nancy	OR	4/4/21	<p>P ease read the statement be ow. It states the case better than anyth ng I cou d th nk of. C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportunit y for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of industry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportunit y to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportunit es now and fo ow ng the DOI s nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on</p>

				climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
142	Nochmson, Martha	NY	4/6/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. PUBLIC LANDS ARE NOW IN THE HANDS OF CRIMINALS. TAKE THEM BACK. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
143	Nochmson, Martha	NY	4/12/21	Climate change is one of the most universal environmental and social justice issues of our time. OUR PRECIOUS PUBLIC LANDS ARE WORTH INFINITELY MORE THAN SHORT TERM PROFITS. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
144	Lazarewicz, Cathy	NY	4/7/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first

				<p>step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportu nty to f x and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportu ntes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportu nty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew. Do the r ght th ng.
145	Soan, Hope	OR	4/5/21	<p>P ease we are see ng t a over Oregon w th drought and w df res so many towns were destroyed th s year n the W amette Va ey, near Port and and down by Eugene th s s not norma th s s drought. We a so had a terr be ce storm th s w nter that abso ute y destroyed the W amette va ey we ost or damaged a most every tree that wasnít an evergreen we are st not even cose to cean ng up a the downed trees. I ost two n my yard I be eve that drought made them ess f ex b e because they were starv ng from sap oss. We have had ce storms that had much more ce be never caused damage ke th s there were peop e w thout power for at east a week some onger because of tree damage. P ease p ease p ease do someth ng we w not surv ve as we know our wor d n the future f noth ng s done. C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportu nty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportu nty to f x and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportu ntes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportu nty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
146	Cark Harr s, Susan	MN	4/3/21	<p>P ease protect the pub c ands!! C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportu nty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportu nty to f x and</p>

				<p>align the current program with the administrative climate, public health and equity goals. As you start the review process of the federal energy system, please prioritize: - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and land management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
147	Do man, Nancy	OH	4/10/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this pause on oil and gas energy and conduct a comprehensive review of the federal energy program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administrative climate, public health and equity goals. As you start the review process of the federal energy system, please prioritize: - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and land management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Please we need to stop destroying our environment. There is no planet B.</p>
148	McAdam, Peg	MA	4/2/21	<p>Move the fracking, pumping and drilling of oil into history. Protect public lands for a better change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this pause on oil and gas energy and conduct a comprehensive review of the federal energy program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administrative climate, public health and equity goals. As you start the review process of the federal energy system, please prioritize: - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and land management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and</p>

				<p>communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
149	Kkkert, Eric Maker	WA	4/2/21	<p>When the Alpha and Omega join together, it's called an Alpha Fathom. Alpha is God (positive energy), Omega is Matter (Existence). Alpha Fathom = a of the above. Positive and Negative constructs define our existence. It's time we take a proper look at reality. From and on to we learn how bioenergy gives birth to God as we enter the world of particle progression. When your and energy connect on (this is the energy within your body that powers your brain) becomes in contact with a force like gravity which overpowers its natural flow and and of energy.† The particle of energy then leaves its predetermined and as gravity enforces a new condition which makes its forward progression along the surface more difficult (like your nerves) and is then forced by gravity to leave the body due to path of resistance. I have defined bioenergy and gravity and how the currents in the body will act when introduced to an overpowering source of gravity due to the micro-mass present in energy as this then coagulated to form the entity you call God.</p> <p>https://www.a4you2020.org A so.... you should consider expanding funds to remove our dependence on other countries. This way we can just give them the money how we choose like housing and defence. Handing them vast amounts of unchecked funding allows them to do what you're doing. Which is whatever you want. That I find out anyway...</p> <p>Climate change is one of the most universal environmental and social issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize the opportunity and pause on oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters by starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
150	Askns, Susanna	OR	4/5/21	<p>Climate change is one of the most universal environmental and social issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize the opportunity and pause on oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters by starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.

				<p>po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun t es that depend on foss fue s and the commun t es that cont nuous y suffer the greatest mpact of foss fue po ut on. WHAT ARE YOU WAITING FOR???!!!</p>
151	Br sk n, Jordan	CA	4/2/21	<p>C mate change s one of the most urgent and un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oopho es that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, t behooves you to pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun t es now and fo ow ng the DOIís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun t es that depend on foss fue s and the commun t es that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
152	Den sh, Lou se	CA	4/5/21	<p>P ease note: C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oopho es that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun t es now and fo ow ng the DOIís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun t es that depend on foss fue s and the commun t es that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
153	Den sh, Lou se	CA	4/3/21	<p>P ease note: C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and</p>

				conducting a comprehensive review of the federal leasing program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and land management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
154	Koberdanz, Katherine	CO	4/3/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and land management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. The oil & gas industry has eaten up and run. We'd count to a point that the lands are unrecognized as Farm and anymore. Once fields of corn just 2 years ago become sodgy barren dirt. Useless now due to spills. The crops never to grow again because the farmers sold out sold the water rights. People are money hungry. No longer are they stewards of the land. You must save our public lands and what's left of our Wild horses and burros. A wilds must be saved the lands returned..the 10 year leases needed. Please stop this Greedy madness and help restore OUR lands. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
155	Koberdanz, Katherine	CO	4/4/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. Getting oil and gas off our BLM and USFS ranges and getting cattle and

				<p>recreation ATVs off public lands is crucial. Please replace our Wild horses and Burros to fix our Ecosystems back to viability. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real costs, and ensuring decisions are based on science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
156	Wams, Chris	OR	4/3/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to ease sea level rise. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real costs, and ensuring decisions are based on science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. It has to end</p>
157	Henderson, Tom	IN	4/3/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to ease sea level rise. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real costs, and ensuring decisions are based on science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the</p>

				<p>greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. By the people, of the people, and for the people...We speak. Telling a story of the ages. We speak of a people who shared the relationship with Mother Nature. Living off the land and without disturbing its balance. However, Greed and the feeling of being entitled, more so, than other people or groups...have distorted the critical idea which they have long since supported: Personal Responsibility, to honor the land that supports the lives as well as the rest of life on the planet! Sincerely, Tom Henderson, MSW</p>
158	Wise, Joseph	MS	4/6/21	<p>Climate change is one of the most universal environmental issues of our time. Mother Earth is Sacred, stop oil and gas leasing and protect national parks and all of Mother Nature. We will not parasitize to destroy and desecrate our Mother Earth, We will stop the evil people from destroying and desecrating our Mother Earth. We will fight and not allow this to happen. STOP ALLOWING corporations and polluters ON NATIONAL PARKS AND STOP DESTRUCTION OF MOTHER EARTH.</p>
159	Wise, Joseph	MS	4/10/21	<p>I demand you stop allowing corporations onto the national parks to exploit and destroy the beautiful nature, good people of the Earth will NOT allow these evil things to happen we will fight with every fiber of our being and we will NOT allow any fracking, mining, strip mining, oil and gas, deep sea bed mining, murdering wildlife, poaching or any horrible evil thing like these things to ever happen, we will fight and NOT allow these things to take place. We will fight, protect, and defend our universe, planet, SACRED MOTHER EARTH, MOTHER NATURE as custodians, caretakers, defenders, protectors, and stewards.</p>
160	Wise, Joseph	MS	4/13/21	<p>Stop allowing corporations into national parks to exploit and destroy !! We will NOT allow these horrible evil things to happen !! We will fight with strength and resolve with every fiber of our being and protect our beautiful planet/universe our SACRED MOTHER EARTH, MOTHER NATURE, as custodians, defenders, protectors, and stewards. !!!!</p>
161	Wise, Joseph	MS	4/14/21	<p>Stop allowing corporations on to the national parks and land to exploit and destroy. We will NOT allow these horrible evil things to happen. We will fight with strength and resolve with every fiber of our being, protect and defend. As custodians, caretakers, defenders, protectors, and stewards, we will protect our beautiful planet/universe our SACRED MOTHER EARTH, MOTHER NATURE. !!!!</p>
162	Zeeb, Debra	MI	4/4/21	<p>Please protect our lands!! I would like to see my grandchildren and great grandchildren be able to enjoy our nation just as we have. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change to ease sea level rise. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to

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163	Hannemann, Gora	FL	4/5/21	<p>C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to f x and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOIís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. The peop e who ave these we s shou d be respons be for capp ng them and the cean-up of surround ng areas. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
164	Capper s, Pau ette	OH	4/13/21	<p>C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to f x and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze:</p> <ul style="list-style-type: none"> - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOIís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. I ved n PA. But because of the frack ng and the metr c tons of Methane re eased PA's a r has turned to mo d and other carc nogens from the frack ng ndustry. Then they started bu d ng a cracker p ant that puts out tons of VOC's. I moved to the s de of C eve and OH that has the w ndm s and ceaner a r. I mo ss my fam yand fr ends but I cannot ve hea thy n PA. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
165	bu , sambo	WA	4/4/21	<p>Dear Assho es, C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a cr t ca frst step. The current program s broken and outdated, fu of</p>

				<p>industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easings system, please prioritize: - Strong, meaningful trade consultation and commitment to trade treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated easings and land management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Yours most sincerely, Samue</p> <p>Fucking Bush 98273</p>
166	Winters, Drus a	OR	4/4/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this. Pausing oil and gas easings and conducting a comprehensive review of the federal easings program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easings system, please prioritize: - Strong, meaningful trade consultation and commitment to trade treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated easings and land management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. This is an organization's letter but I wanted to personally write because this issue is so important. How we treat the environment is a measure of the kind of people we are as much as how we treat the weakest among us. Without a healthy environment mankind will not survive.</p>
167	Westman, Kathryn	PA	4/4/21	<p>I write as a Registered Nurse concerned about the continuing negative health and environmental effects of the fossil fuel industry as more and more studies confirm the damage, I am also a grandmother wanting to leave a safe world for future generations. As a person of faith we must be good stewards of our resources and because we know better, we must Do better. And as an American citizen I WANT OUR COUNTRY TO SHOW GLOBAL RESPONSIBILITY AND LEADERSHIP. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this. Pausing oil and gas easings and conducting a comprehensive review of the federal easings program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the</p>

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168	Westman, Kathryn	PA	4/9/21	<p>I wr te as a person of fa th and Reg stered Nurse, concerned c t zen and grandmother of three ch dren. C mate change s one of the most un versa env ronmenta and soc a just ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oopho es that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.</p>
169	Schrader, John	MO	4/5/21	<p>C mate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on c mate changeóp ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oopho es that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onís c mate, pub c hea th and equ ty goa s. As you start the rev ew process of the federa eas ng system, p ease pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besí treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOLís nter m report; - Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po c es, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and - Creat ng a p an to ach eve a just econom c trans t on that decoup es state budgets and soc a serv ces from foss fue revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the</p>

				greatest impact of fossil fuel pollution. It's time to stop the Fossil Fuel Industries paying off Politicians to gain control of these lands and polluting them more. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
170	Clark Harris, Susan	MN	4/5/21	These public lands are beautiful examples of what we do not want wasted or exploited for profit. We are trying to save them for future generations! Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change opportunities. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
171	Rosenbloom, J	NY	4/5/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change opportunities. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. Thank you for your recognition of our obligation to be responsible stewards of the earth. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
172	Thomas, Sally	NC	4/5/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change opportunities. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank

				<p>you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easement system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters that start by making them a net-zero source of emissions by 2030 by overhauling outdated easement and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. We are counting on you to do the best thing for ALL of us and for our country. Thank you!
173	Zacek, Caroline	NE	4/6/21	<p>FIRST-I MUST STATE HOW HAPPY AND GRATEFUL I AM THAT DEB HAALAND IS OUR NEE SECRETARY OF INTERIOR!!! Climate change is one of the most universal environmental and social issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change immediately. Pausing oil and gas easement and conducting a comprehensive review of the federal easement program is a critical first step. The current program is seriously broken and outdated, full of industry handouts and loopholes that threaten our clean air and water-ESPECIALLY FOR OUR MOST VULNERABLE NATIVE AMERICANS-(please see a ways go try to go through Native American territory instead of property owned by white people). Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easement system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters that start by making them a net-zero source of emissions by 2030 by overhauling outdated easement and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
174	Carke, Gerald	TX	4/7/21	<p>Climate change is one of the most universal environmental and social issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change immediately. Pausing oil and gas easement and conducting a comprehensive review of the federal easement program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easement system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters that start by making them a net-zero source of emissions by 2030 by overhauling outdated easement and management policies, charging oil and gas companies for their

				<p>c mate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Public Lands belong to the American public. They should be protected for all generations of Americans to enjoy.</p>
175	H , Bridgar	MT	4/7/21	<p>We must Protect what we have now because we are experiencing loss of biodiversity, habitat loss, and extinction of many animals across the globe. Montana's parks contain some of the last truly wild areas left in the world. The removal of these protected lands and parks will result in these delicate ecosystems to be vulnerable by human activities. Alberta parks and camp sites are amazing wild places and need protection. We need to put money and resources into developing a more environmentally friendly tourism and recreation outdoor activities such as fishing, skiing, camping, and hiking. This budget for the outdoors will secure and ensure that Montana will have one of the best clean and healthiest places to live for future generations.</p>
176	H , Bridgar	MT	4/9/21	<p>We must Protect what we have now because we are experiencing loss of biodiversity, habitat loss, and extinction of many animals across the globe. Southern Alberta's parks contain some of the last truly wild areas left in the world. The removal of these protected lands and parks will result in these delicate ecosystems to be vulnerable by human activities. Alberta parks and camp sites are amazing wild places and need protection. We need to put money and resources into developing a more environmentally friendly tourism and recreation outdoor activities such as fishing, skiing, camping, and hiking. This budget for the outdoors will secure and ensure that Canada will have one of the best clean and healthiest places to live for future generations.</p>
177	Soto, Caro	CA	4/8/21	<p>The world's natural climate crisis. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize the moment and gas emissions and conducting a comprehensive review of the federal emissions program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and improve the current program with the administration's climate, public health and equity goals. As you start the review process of the federal emissions system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated emissions and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
178	Easley, Dave	LA	4/8/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize the moment and gas emissions and conducting a comprehensive review of the federal emissions program is a critical first step. The current program is broken and outdated, full of industry</p>

				<p>handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated easing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. To be totally honest. We, as a nation, should be leading the world in moving as fast as possible towards clean energy, solar, wind, and other renewables. Any fossil fuel extraction anywhere should cease immediately. We don't have much time to avert climate disaster. The polar vortexes we experienced this year are due to the fact that the jet stream that regulates our weather patterns is already weakening due to insufficient differences between polar temperatures and temperatures below the arctic circle. It would really be relevant to consult with climate scientists on any question involving fossil fuel extraction. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
179	Pette, Jane	ME	4/8/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change and ease the transition. Pausing oil and gas easing and conducting a comprehensive review of the federal easing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal easing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated easing and management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Our public lands must be protected from further development and exploitation.
180	Schockme, Kate	UT	4/8/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. We must make extraction industries take responsibility for environmental damages. Public lands and waters provide an immediate opportunity for the federal government to act on climate change and ease the transition. Pausing oil and gas easing and conducting a comprehensive review of the federal easing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals.</p>

				<p>goals. As you start the review process of the federal energy system, please prioritize: - Strong, meaningful trade consultation and commitment to trade treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
181	Lohman, Alexandra	OH	4/8/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize the moment and get started. Pausing oil and gas energy and conducting a comprehensive review of the federal energy program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal energy system, please prioritize: - Strong, meaningful trade consultation and commitment to trade treaty rights - Robust and inclusive public input opportunities now and following the DOL's interim report - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues, and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in, and for prioritizing the right voices at the table throughout your review.</p>
182	Tomko, Debra	MD	4/8/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize the moment and get started. Pausing oil and gas energy and conducting a comprehensive review of the federal energy program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal energy system, please prioritize: - Strong, meaningful trade consultation and commitment to trade treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Public lands were never meant to be touched by man. They are</p>

				for a people and worldwide. Recover all the stolen property., none of those receiving stolen property jail time.
183	Roberts-Ibarra, Susan	CA	4/9/21	Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please see the following and gas leasing and conducting a comprehensive review of the federal leasing program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. ((SFRI)) - - - PLEASE GIVE THEM BACK !!!!!!!!!!!!!!!!!!!!!!!!!!!!!
184	Caros, Banco	LA	4/10/21	Climate change is one of the most universal environmental and social justice issues of our time, with the scientific community consensus that urgent action is needed now. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please see the following and gas leasing and conducting a comprehensive review of the federal leasing program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
185	Nathan, Martha	MA	4/10/21	Climate change is the most universal environmental and social justice issue of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please see the following and gas leasing and conducting a comprehensive review of the federal leasing program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty

				<p>rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
186	Simmons, Pam	MI	4/10/21	<p>I agree with the following statement. Sincerely, Pam Simmons Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change immediately. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current programs are broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
187	Northam, Cauda	PA	4/10/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. And it needs to be stopped right now. Public lands and waters provide an immediate opportunity for the federal government to act on climate change immediately. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current programs are broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on resource science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing</p>

				the right voices at the table throughout your review. Do the right thing and help our planet, I beg you!!
188	Meyer, John	WI	4/10/21	Climate change is one of the most debated issues that our nation. For God's sake please disregard anything that the Wilderness Society promotes and stop agreeing with them on 99% of the objectives. Thank you for the opportunity to weigh in about this corrupt and useless society.
189	Grover, Kathleen	TN	4/10/21	Climate change is one of the most universal environmental and social issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this opportunity and pause on oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Our children and future generations will benefit from our protecting our environment.
190	Venrooy, Kathy	FL	4/10/21	Climate change is one of the most universal environmental and social issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this opportunity and pause on oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Our public lands belong to Americans, not just the corporations and fossil fuel industry. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
191	Lacey, Dorothy	FL	4/10/21	Climate change is one of the most universal environmental and social issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please seize this opportunity and pause on oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first

				<p>step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal energy system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; I've been rooting for the Indians in the cowboy movies for over 60 yrs. Win this time. - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters; starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and land management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
192	Fam y, The wojo	CO	4/11/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Our environment health and welfare matter! Renewables are the future we want an earth for our children! Public lands and waters provide an immediate opportunity for the federal government to act on climate change; please seize it. Pausing oil and gas energy and conducting a comprehensive review of the federal energy program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal energy system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters; starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and land management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
193	Rice, Shrey	NY	4/11/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change; please seize it. Pausing oil and gas energy and conducting a comprehensive review of the federal energy program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal energy system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters; starting by making them a net-zero source of emissions by 2030 by overhauling outdated energy and land management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on climate science;

				and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Stop the killing of the wild animals that live on public lands for cattle and sheep ranchers. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
194	Johnson, Ga	OR	4/11/21	Donald Trump did so much damage. Can't we undo some of it. We need to end the search for new sources of oil and stop building the infrastructure. We need change now to fight Climate change.. It's a matter of survival for our children and grandchildren. Public lands and waters provide an immediate opportunity for the federal government to act on climate changeop ease se ze t. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and watersostartng by making them a net-zero source of emissions by 2030by overhauling outdated leasing and land management policies, charging oil and gas companies for the climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
195	Cruze, Conn e	TN	4/11/21	'From sea to shining sea' will cease to be truth without your action. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate changeop ease se ze t. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and watersostartng by making them a net-zero source of emissions by 2030by overhauling outdated leasing and land management policies, charging oil and gas companies for the climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
196	Fergen, B.	SD	4/11/21	Climate change is one of the most universal environmental and social justice issues of our time. We only have one earth and billions of people are trying to survive. We need to step up the protection of land

				<p>and water in our country. Public lands and waters provide an immediate opportunity for the federal government to act on climate change opportunities. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.
197	Stallone, Marie	NY	4/11/21	<p>Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change opportunities. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize:</p> <ul style="list-style-type: none"> - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOI's interim report; - Creating a plan for achieving pollution-free public lands and waters so starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the real climate costs, and ensuring decisions are based on climate science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review. Any monetary gain from conscientious stewardship should be put back into the government. It's the land of the people! Any riches gained should be on to the people!
198	Lockwood, Heidi	NY	4/12/21	<p>Like millions of other Americans who love our beautiful country, and who understand how desperately we need to move away from fossil fuels, I suffered much grief and pain over mismanagement of our public lands during the Trump presidency. Climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change opportunities. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal</p>

				<p>easing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
199	Bevers, Rae	CO	4/13/21	<p>Oil and gas on public land climate change is one of the most universal environmental and social justice issues of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate change. Please take a pause on oil and gas leasing and conducting a comprehensive review of the federal leasing program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution. Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.</p>
200	Tseks, Elaine	ME	4/13/21	<p>Climate heating is the most universal environmental and social justice issue of our time. Public lands and waters provide an immediate opportunity for the federal government to act on climate heating. Please take a pause on oil and gas leasing and conducting a comprehensive review of the federal leasing program as a critical first step. The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals. As you start the review process of the federal leasing system, please prioritize: - Strong, meaningful tribal consultation and commitment to tribal treaty rights; - Protecting, preserving and restoring natural habitats for wildlife - Dismantling Wildlife Services, which is a killing and poisoning entity. - Robust and inclusive public input opportunities now and following the DOL's interim report; - Creating a plan for achieving pollution-free public lands and waters starting by making them a net-zero source of emissions by 2030 by overhauling outdated leasing and management policies, charging oil and gas companies for the resource costs, and ensuring decisions are based on science; and - Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest</p>

				mpact of foss fuel po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
201	Tourkak s, Gregory	TX	4/13/21	Dear Madam/S r: Climate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on climate change ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis climate, pub c hea th and equity goa s. As you start the rev ew process of the federa eas ng system, please pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOI s nter m report; - Creat ng a plan for ach ev ng po ut on-free pub c ands and waters start ng by mak ng them a net-zero source of em ss ons by 2030 by overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the climate costs, and ensur ng dec s ons are based on climate science; and - Creat ng a plan to ach eve a just econom c trans t on that decou es state budgets and soc a serv ces from foss fuel revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fuels and the commun tes that cont nuously suffer the greatest mpact of foss fuel po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
202	Cooper, Krysta	KS	4/14/21	Please, do better than Trump. I know you acknow edge the science s rea . Please act on t. Climate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on climate change ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis climate, pub c hea th and equity goa s. As you start the rev ew process of the federa eas ng system, please pr or t ze: - Strong, mean ngfu tr ba consu tat on and comm tment to tr besi treaty r ghts; - Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOI s nter m report; - Creat ng a plan for ach ev ng po ut on-free pub c ands and waters start ng by mak ng them a net-zero source of em ss ons by 2030 by overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the climate costs, and ensur ng dec s ons are based on climate science; and - Creat ng a plan to ach eve a just econom c trans t on that decou es state budgets and soc a serv ces from foss fuel revenues and pr or t zes the nput and needs of workers and commun tes that depend on foss fuels and the commun tes that cont nuously suffer the greatest mpact of foss fuel po ut on. Thank you for the opportun ty to we gh n and for pr or t z ng the r ght vo ces at the tab e throughout your rev ew.
203	W ght, Dean	WA	4/14/21	I st on a climate ust ce comm tee for our denom nat on, the Commun ty of Chr st. Climate change s one of the most un versa env ronmenta and soc a ust ce ssues of our t me, and we are mob z ng to br ng urgent attent on to our climate cr s s. Pub c ands and waters prov de an mmed ate opportun ty for the federa government to act on climate change ease se ze t. Paus ng o and gas eas ng and conduct ng a comprehens ve rev ew of the federa eas ng program s a crt ca frst step. The current program s broken and outdated, fu of ndustry handouts and oophoes that threaten our cean a r and water. Thank you for tak ng th s opportun ty to fx and a gn the current program w th the adm n strat onis climate, pub c

				<p>health and equity goals. As you start the review process of the federal eas ng system, please pr ortze:</p> <ul style="list-style-type: none">- Strong, meaningful tr ba consu tat on and comm tment to tr besi treaty r ghts;- Robust and nc us ve pub c nput opportun tes now and fo ow ng the DOI's nter m report;- Creat ng a p an for ach ev ng po ut on-free pub c ands and watersóstart ng by mak ng them a net-zero source of em ss ons by 2030óby overhau ng outdated eas ng and and management po ces, charg ng o and gas compan es for the r c mate costs, and ensur ng dec s ons are based on c mate sc ence; and- Creat ng a p an to ach eve a just econom c trans t on that decou es state budgets and soc a serv ces from foss fue revenues and pr ortzes the nput and needs of workers and commun tes that depend on foss fue s and the commun tes that cont nuous y suffer the greatest mpact of foss fue po ut on. <p>Thank you for the opportun ty to we gh n and for pr ortz ng the r ght vo ces at the tab e throughout your rev ew.</p>
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To: Department of Interior

Subject: Prioritize public input and pollution-free public lands during review

Message:

Climate change is one of the most universal environmental and social justice issues of our time.

Public lands and waters provide an immediate opportunity for the federal government to act on climate change—please seize it. Pausing oil and gas leasing and conducting a comprehensive review of the federal leasing program is a critical first step.

The current program is broken and outdated, full of industry handouts and loopholes that threaten our clean air and water. Thank you for taking this opportunity to fix and align the current program with the administration's climate, public health and equity goals.

As you start the review process of the federal leasing system, please prioritize:

- Strong, meaningful tribal consultation and commitment to tribes' treaty rights;
- Robust and inclusive public input opportunities now and following the DOI's interim report;
- Creating a plan for achieving pollution-free public lands and waters—starting by making them a net-zero source of emissions by 2030—by overhauling outdated leasing and land management policies, charging oil and gas companies for their climate costs, and ensuring decisions are based on climate science; and
- Creating a plan to achieve a just economic transition that decouples state budgets and social services from fossil fuel revenues and prioritizes the input and needs of workers and communities that depend on fossil fuels and the communities that continuously suffer the greatest impact of fossil fuel pollution.

Thank you for the opportunity to weigh in and for prioritizing the right voices at the table throughout your review.

Sincerely,

	Name	State	Date
204	.iller, Barbara	NM	4/5/21
205	A Forbes, Georgia	MI	4/5/21
206	A Silvestro, Sandra	MD	4/8/21
207	Abbott, Debra	VA	4/4/21
208	Abbott, Kathleen	MA	4/2/21
209	Abel, Richard	OH	4/5/21
210	Abel, Richard	OH	4/11/21
211	Abels, Iret	NH	4/7/21
212	Abezgauz, Olya	NY	4/9/21
213	Abner, C.	OH	4/4/21
214	Abraham, Virginia	VA	4/13/21
215	Abrams, Lori	NH	4/3/21
216	Accorsi, Carol	NY	4/4/21
217	Acker, Mary	MI	4/6/21
218	Ackerman, Barb	OH	4/4/21
219	Ackman, Karen	OH	4/13/21
220	Acs, Deborah	NC	4/6/21
221	Adams, Catherine	WA	4/13/21
222	Adams, Holly	NY	4/3/21
223	Adams, Penny	WA	4/6/21
224	Adams, Reade	MN	4/9/21
225	Adams, Thunder	NM	4/7/21
226	Addison-Perkins, M. Dianne	CO	4/7/21
227	Adkins, Mary	TX	4/8/21
228	Adler, Jeff	FL	4/14/21
229	Adler, Michael	FL	4/4/21
230	Agugliaro, Karen	PA	4/9/21
231	Aguilera, Karen	OR	4/9/21
232	Aguirre, Robert	MI	4/13/21
233	Aguirre, Teresa	TX	4/3/21
234	Ahlgrim, Cate	TN	4/7/21
235	Ahlstrand, Heidi	MN	4/13/21
236	Ainsworth, Terri	WI	4/5/21
237	Akerley, Selena	MN	4/4/21
238	Akert, Faith	MI	4/9/21
239	Aksoy, Darlene	TX	4/11/21
240	Al-Tukhaim, Mary Jo	MA	4/13/21
241	Alberse, James	VA	4/6/21

242	Albertini, John	ME	4/10/21
243	Albertson, Constant	ME	4/6/21
244	Albrecht, Lynnette	CO	4/6/21
245	Albrecht, Yvonne	AZ	4/4/21
246	Aldrich, Chris	MA	4/14/21
247	Aldrich, John	NY	4/11/21
248	Alexander, Dan	NY	4/10/21
249	Alexander, Jack	HI	4/9/21
250	Alexander, Linda	FL	4/5/21
251	Alexander, Natalie	HI	4/3/21
252	Alfandari, Elena	NY	4/7/21
253	Alferos, Linda	RI	4/3/21
254	Algarin, Kathy	CA	4/13/21
255	Alibozek, Barbara	VT	4/12/21
256	Alkebulan, Nzingha	GA	4/14/21
257	Allatt, Edmund	CA	4/6/21
258	Allen, Everett	WA	4/4/21
259	Allen, Lee	VA	4/3/21
260	Allen, Linda	IL	4/3/21
261	Allen, Nora	IL	4/3/21
262	Allen, Sandy	OH	4/3/21
263	allen, Vickie	CA	4/3/21
264	Alley, Patrick	FL	4/9/21
265	Alstrum, Timothy	CT	4/5/21
266	Amsden, Lorri	OR	4/7/21
267	Amundsen-Kuester, Connor	OR	3/30/21
268	Ancin, Valoy	ID	4/12/21
269	Andersen, Chantal	GA	4/8/21
270	Anderson DeVito, Jean	NC	4/3/21
271	Anderson, Alison	MO	4/8/21
272	Anderson, Becky	WA	4/6/21
273	anderson, brad	OH	4/14/21
274	Anderson, Deborah	MO	4/8/21
275	Anderson, John	NJ	4/4/21
276	Anderson, Julie	SD	4/2/21
277	Anderson, Kevin	WA	4/6/21
278	Anderson, Linda	MN	4/12/21
279	Anderson, Liz	KY	4/10/21
280	Anderson, Mary	IL	4/3/21

281	Anderson, Megan	PA	4/8/21
282	Anderson, Robin	CA	4/3/21
283	Anderson, Robin	CA	4/6/21
284	Anderson, Susan	FL	4/9/21
285	Anderson, THEODORE	PA	4/11/21
286	Andresen, Raymond	ME	4/2/21
287	Andrew, Peg	NC	4/4/21
288	Andrews, Arlington	PA	4/8/21
289	Andrews, Becky	LA	4/9/21
290	Andrews, Diane M	IL	4/11/21
291	Andrews, William	MA	4/10/21
292	Andrulli, Carol	MA	4/10/21
293	Anecki, Patricia	WI	4/6/21
294	Angerer, Christine	WA	4/12/21
295	Anixt, Andrea	HI	4/4/21
296	Anker, David	VA	4/2/21
297	Annoni, Patricia	UT	4/4/21
298	Ansary, Gabriele	WI	4/3/21
299	Anson, Tana	IL	4/6/21
300	Anthony, Donna	GA	4/4/21
301	Anthony, Jennifer	OR	4/6/21
302	Anthony, Linea	WI	4/5/21
303	apodaca, Eleanor	FL	4/7/21
304	Appia, Michael	WA	4/11/21
305	Arafa, Julia	FL	4/8/21
306	Arbetman, Alacoque	FL	4/5/21
307	Arbour, Carole	NH	4/8/21
308	Ard, Alice	WA	4/7/21
309	Argentino, Marian	MD	4/6/21
310	Arinder, Joan	MS	4/6/21
311	Armistead, Susan	FL	4/6/21
312	Armknrecht, Leslie	CA	4/10/21
313	armour, cynthia	DE	4/13/21
314	Armstrong, Adaria	NJ	4/7/21
315	Armstrong, Loretta	NY	4/3/21
316	Armstrong, Sandi	FL	4/5/21
317	Armstrong, Susan	TX	4/11/21
318	Arnal, Diane	UT	4/6/21
319	Arndt, Joyce	WI	4/8/21

320	Arnold, Matthew	KY	4/1/21
321	Arnold, Stan	AR	4/5/21
322	Aronson, Allen	CA	4/9/21
323	Arredondo, Aurelio	FL	4/10/21
324	Arrington, Debra	TN	4/6/21
325	Artemis, Susan	AZ	4/13/21
326	Arthur, Elaine	MA	4/9/21
327	Artin, Thomas	NY	4/12/21
328	artman, cara	MO	4/4/21
329	Asbury, Mamie	FL	4/6/21
330	Asbury, Robin	WV	4/3/21
331	Ashley, Carol	NC	4/11/21
332	Ashley, L	CA	4/10/21
333	Ashman, Wanda	WI	4/4/21
334	Ashton, Linda	FL	4/6/21
335	Atalay, Julie	VA	4/3/21
336	Atchison, Fran	NH	4/10/21
337	Atkins, MaryGale	VA	4/8/21
338	Atkinson, Rhys	CA	4/7/21
339	Atnip, Susie	TN	4/14/21
340	Attaway, Marlene	ID	4/2/21
341	Atwood, william	TN	4/10/21
342	Auer, Marilyn	CO	4/3/21
343	Auer, Marilyn	CO	4/4/21
344	Austin-Guyer, Agnes	FL	4/3/21
345	Austin, Mel	IL	4/13/21
346	Austin, Pat	VT	4/11/21
347	Avaine, Strong	LA	4/2/21
348	Avakian, Linda	CA	4/3/21
349	Avery, David	CO	4/10/21
350	Avery, Jayn	VA	4/8/21
351	Avery, Mark	NY	4/4/21
352	Aviles, Bridie	MO	4/14/21
353	Awan, Aashir	NJ	4/12/21
354	Axelrod, Debbie	PA	4/8/21
355	Ayer, Susan	CO	4/8/21
356	B, J	MI	4/7/21
357	B, Joe	NY	4/10/21
358	B, Susan	KY	4/6/21

359	B., Donna	TX	4/12/21
360	Babb, Debbie	MI	4/4/21
361	Baber, Charles	MI	4/3/21
362	Babicki, Laurie	NJ	4/6/21
363	Bacher, Robert	HI	4/9/21
364	Bacila, Vicki	FL	4/2/21
365	Baer, Elizabeth	MD	4/5/21
366	Bailes, Kevin	WI	4/5/21
367	Bailey, Daniel	GA	4/10/21
368	Bailey, Deborah	MI	4/13/21
369	Bailey, nancy	WA	4/7/21
370	Bailey, Noel	RI	4/14/21
371	Bailie, Janae	AZ	4/11/21
372	Bailley, Mary	OH	4/13/21
373	baker, C	OH	4/7/21
374	Baker, Cindy	PA	4/3/21
375	Baker, Danny	AZ	4/8/21
376	Baker, Jahn	AZ	4/4/21
377	Baker, Linda	MI	4/3/21
378	Baker, Mary	OH	4/6/21
379	Baker, Michele	CA	4/5/21
380	Baker, R	UT	4/2/21
381	Baker, Sheila	CA	4/7/21
382	BALCH, RoseMarie	WA	4/6/21
383	Baldus, Barbara	MN	4/3/21
384	Baldwin, Jane	OH	4/2/21
385	Baldwin, Marilynn	MD	4/7/21
386	Bale, Sandra	WA	4/6/21
387	Balentine, Cynthia	FL	4/3/21
388	Bales, Sushila	VA	4/4/21
389	Balint, Christine	NJ	4/12/21
390	Ball, Connie	AZ	4/6/21
391	Ballard, Susan	OH	4/5/21
392	Banks, Jerry	GA	4/13/21
393	Baraby, Kelly	MT	4/14/21
394	Baravetto, Gail	ID	4/3/21
395	Barber, Frances	MD	4/10/21
396	Barclay, Carol	NY	4/10/21
397	Barclay, Marcia	MO	4/4/21

398	Barfield, Bonnie	GA	4/3/21
399	Barg, Tamara	TX	4/4/21
400	Barker, Linda	VA	4/9/21
401	Barker, Steve	NV	4/10/21
402	Barker, Tom	FL	4/3/21
403	Barlow, Ray	IL	4/6/21
404	Barnes, Amelia	NY	4/6/21
405	Barnes, Janet	IN	4/2/21
406	Barnes, Lynn	MI	4/9/21
407	Barnes, Melody	GA	4/9/21
408	Barnett, Bonnie	AZ	4/3/21
409	Barnhart, Patricia	PA	4/9/21
410	Baron, Barbara	FL	4/4/21
411	barr, gina	OR	4/5/21
412	Barrett, Cynthia	GA	4/6/21
413	Barrett, Jack	PA	4/4/21
414	Barry, Matt	PA	4/2/21
415	Barry, Micheal	ID	4/3/21
416	Bartlett, Carol	NH	4/4/21
417	Bartley, Gail	IN	4/5/21
418	bartley, tom	TX	4/3/21
419	Barton, Charlene	MO	4/12/21
420	Barton, Marie	SC	4/10/21
421	Barulich, Maryann	NY	4/11/21
422	Basker, Jacqueline	NY	4/8/21
423	Bass, Sharon	LA	4/14/21
424	Batchelder, Carol	RI	4/13/21
425	BATCHELDER, EDWARD	WA	4/14/21
426	Bateman, Lynn	OR	4/4/21
427	Bates, Barbara	IL	4/3/21
428	Bates, Jennifer	WA	4/13/21
429	Bates, Seth	CA	4/6/21
430	Batson, Jon	NH	4/9/21
431	Battaglia, Ruth	WI	4/3/21
432	Battiste, Ann	IL	4/2/21
433	bauer, philip	KS	4/14/21
434	BauerPage, Becky	ID	4/14/21
435	Baumgardner, William	NC	4/2/21
436	Baus, Leslie	OH	4/14/21

437	Bausch, Dawn	CO	4/4/21
438	Bautista, Janet	WA	4/4/21
439	Baville, Mary	CA	4/6/21
440	Baxter, Judith	MI	4/2/21
441	Baxter, Stephanie	MD	4/8/21
442	Beams, Don	NM	4/8/21
443	Beaudoin, Andrew	MI	4/3/21
444	Beaulieu, Richard	FL	4/11/21
445	Bechtle, Cheryl	AZ	4/9/21
446	Beebe, James	IL	4/8/21
447	Beechert, Alice	OR	4/3/21
448	Beemer, Sandra	TX	4/8/21
449	Beer, Diana	IN	4/8/21
450	Beers, Sharon	CO	4/6/21
451	Beers, Sheila	IN	4/5/21
452	Behle, Pamela	NE	4/9/21
453	Belanger, Deborah	MA	4/14/21
454	Belfiore, Janice	FL	4/14/21
455	Bell, Brenda	AL	4/14/21
456	Bell, Emily	OH	4/4/21
457	Bell, Rick	PA	4/8/21
458	Bell, Steve	IA	4/3/21
459	Belshaw, Mary Ann	MI	4/9/21
460	Benjamin, Jeremy	CA	4/14/21
461	Bennett, Chasse	OR	4/3/21
462	Bennett, Nancy	AZ	4/12/21
463	Bennett, Suzanne	MN	4/6/21
464	Bennight, Alexis	CA	4/3/21
465	Benson, Cris	CA	4/3/21
466	Benson, Sarah K	WA	4/10/21
467	Benton, Marla	IL	4/10/21
468	Beres, Bonnie	MI	4/6/21
469	Bergalis, Anna	FL	4/2/21
470	Bergen, Luanne	IA	4/4/21
471	Berger, Dian	ID	4/13/21
472	Berger, Vernon	TX	4/3/21
473	bergeron, dave	WA	4/3/21
474	Bergeron, Jean-Paul	NC	4/11/21
475	Bergman, Ingrid	FL	4/3/21

476	Bergner, Olivia	NC	4/6/21
477	Berk, Pauline	FL	4/10/21
478	Berkeyheiser, Marge	PA	4/9/21
479	BERMAN, KIMBERLY	NH	4/6/21
480	Berndt, Dyann	IL	4/13/21
481	Berntson, LynMarie	MN	4/3/21
482	Bertram, Frederick	NY	4/6/21
483	Berzac, Susan	CO	4/5/21
484	Besicmann, Dijana	NV	4/1/21
485	Bessler, Mike	WA	4/2/21
486	Betz, Constance	NV	4/14/21
487	Beuthien, William	MI	4/4/21
488	Beverly, J.	IL	4/12/21
489	Bevis, Stacey	AL	4/4/21
490	Beyer, Thomas	LA	4/4/21
491	Beyersdorf, Robert	FL	4/3/21
492	Bezy, Tim	NE	4/13/21
493	Biagini, Esther	NC	4/5/21
494	Biava, James	WI	4/8/21
495	bick, bonnie	MD	4/5/21
496	Bicking, Ann	VA	4/13/21
497	Biel, Charlie	IN	4/4/21
498	Bierbrauer, Marjorie	WI	4/2/21
499	Bierens, Jerry	MI	4/6/21
500	Bigelow, Paul	WA	4/6/21
501	Bilgic, Gulfem	NY	4/5/21
502	Bille, Andrea	NJ	4/10/21
503	Billings, Linda	PA	4/7/21
504	Birchwale, Carol	NY	4/4/21
505	Birmingham, Alan	OH	4/5/21
506	Bishop, Christie	CO	4/11/21
507	Bisset, William	NJ	4/7/21
508	Bitner, Robin	PA	4/7/21
509	Bittman, Roxanne	CA	4/3/21
510	Biwer, Yseult	CA	4/12/21
511	Bjornbak, Sharron	MI	4/11/21
512	Black McDonald, Stephanie	PA	4/10/21
513	black, rebecca	PA	4/6/21
514	Blackford, Lisa	TX	4/11/21

515	Blacklidge, Thomas	OR	4/4/21
516	Blackwood, Barbara	WA	4/2/21
517	Blair, Tanya	PA	4/13/21
518	Blair, William	ID	4/12/21
519	Blakeman, Hannah	NJ	4/5/21
520	Blakney, Elizabeth	WA	4/3/21
521	Blancett, Deb	MO	4/4/21
522	Blanchard, Meg	NV	3/31/21
523	Blankenship, Tina	SC	4/6/21
524	Blaser, Sally	CO	4/3/21
525	Blattner, Kathleen	MI	4/10/21
526	Bleckinger, dana	OR	4/5/21
527	Bleecker, Harrie	MI	4/14/21
528	Bloom, Andrea	CT	4/5/21
529	Bloom, Claudia	AZ	4/5/21
530	Blosser, Frederick	OH	4/4/21
531	Blount, Corry	TX	4/3/21
532	Blue, Carol	WA	4/12/21
533	Blue, Cindy	IL	4/11/21
534	Blumenstein, Kit	TX	4/8/21
535	Boardman, Ian	MA	4/11/21
536	Bobak, Lana	MI	4/6/21
537	Bober, Janice	PA	4/3/21
538	Bobo, Eda	OH	4/6/21
539	Bobrick, Melantha	OR	4/8/21
540	Bock, Norma	NY	4/11/21
541	Bockelman, Kathryn	VA	4/3/21
542	Bogan, Marcee	NE	4/8/21
543	Bogart, C J	IL	4/7/21
544	Bogert, Larry	NJ	4/5/21
545	Bogin, Sandra	MI	4/5/21
546	Bohm, Richard	GA	4/3/21
547	Bolanos, Isa	IL	4/13/21
548	Bollinger, Robert	TX	4/4/21
549	Bolser, Sjsie	FL	4/4/21
550	Bolt, Jennifer	OK	4/1/21
551	Boltz, Rose	OH	4/3/21
552	Boniface, Kathryn	OH	4/8/21
553	Bonner, Terri	CO	4/7/21

554	Book, Helen	PA	4/8/21
555	Boone, Andrea	CA	4/3/21
556	Boone, Andrea	CA	4/7/21
557	Boone, Jim	NV	4/7/21
558	Booton, Julie	NC	4/4/21
559	Bordin, Carol	WA	4/4/21
560	Borne, Carmen	AR	4/7/21
561	Borys, Susan	NC	4/11/21
562	Bosworth, Monica	NY	4/10/21
563	Botten, Donna	WA	4/8/21
564	Bottomley, David	FL	4/3/21
565	Botts, Shirley	WI	4/7/21
566	BOUCHER, MONA	ME	4/12/21
567	Boudreau, Susan	CO	4/13/21
568	Boughner, Sharon	IL	4/10/21
569	Boughton, Laelonnie	CA	4/4/21
570	Bourdelle, Peter	PA	4/3/21
571	Bouska, Kathryn	IL	4/10/21
572	Bowen, Jessie	MA	4/6/21
573	Bowen, Misty	MT	4/7/21
574	Bowen, Nancy	WI	4/2/21
575	Bowker, Patricia	FL	4/13/21
576	Bowles, Dawn	TX	4/7/21
577	Bowman-Vickers, Vicki	ME	4/13/21
578	Bowman, Florine	TX	4/7/21
579	Boyce, Ruth	MA	4/2/21
580	Boyd, Bobbi	WA	4/10/21
581	Boyer, Tod	OR	4/3/21
582	Boylan, Timothy	NY	4/3/21
583	boyle, ellen	NY	4/5/21
584	Braaten, C	WA	4/8/21
585	Bradley, Patricia	FL	4/4/21
586	Bradley, Victoria	PA	4/2/21
587	Bradshaw, Beverly	CA	4/6/21
588	bradshaw, donna	TX	4/7/21
589	Bradshaw, Emma	IL	4/6/21
590	Bradshaw, Nellie	WA	4/3/21
591	Bradshaw, Terence	VA	4/10/21
592	Brady, Anne	AL	4/4/21

593	Braeback, MICHAEL	OR	4/3/21
594	Brainerd, Kay	MI	4/4/21
595	Bramhall, Rick	AZ	4/13/21
596	Brammer, Thomas	FL	4/12/21
597	Bramorski, Tadeusz M.	MA	4/3/21
598	Brandenberger, William	OR	4/4/21
599	Brandl, Rose	WI	4/9/21
600	Brandt, Elaine	PA	4/2/21
601	Brandt, Rose	PA	4/12/21
602	Branham, Martha	VA	4/12/21
603	Branigan, Michael	AZ	4/7/21
604	Brannigan, Kelly	CA	4/3/21
605	Bravo, Kelly	NY	4/8/21
606	Brawner, Debbie	TN	4/9/21
607	Bray, Zoe	NV	4/12/21
608	Breeden, Paul	ME	4/4/21
609	Breen, Sue	NY	4/3/21
610	Breene, Catherine	IN	4/5/21
611	Brendlinger, Kenneth	PA	4/7/21
612	Breslauer, Lisa	CA	4/4/21
613	bresnak, donna	NY	4/8/21
614	Brewster PhD, Melvin	CA	4/8/21
615	Brewster, A.	ME	4/10/21
616	Brewster, Gerald	CA	4/10/21
617	Brickell, Julie	CA	4/12/21
618	Brickey, Lucy	VA	4/8/21
619	Bridges, Ellen	OR	4/2/21
620	Briem, Liza	OR	4/6/21
621	Briggs, Teresa	TX	4/3/21
622	Brillhart, Clayton	MI	4/13/21
623	Britton, Marilyn	NH	4/4/21
624	Brochu, Susan	NM	4/4/21
625	Brockman, Walter F	WI	4/3/21
626	Brockway, Renee	IA	4/3/21
627	Brody, Jane	NC	4/11/21
628	Bromley, Sherry	MT	4/7/21
629	Brooke, Louise	CO	4/10/21
630	Brooker, Eric	SC	4/3/21
631	Brookins, Tebias	GA	4/10/21

632	Brooks, Dr John	GA	4/4/21
633	Brooks, Greg	CO	4/11/21
634	Brooks, Jeff	WI	4/8/21
635	Brooks, Johnny	TX	4/4/21
636	Brooks, Pamela	OH	4/9/21
637	Brooks, Theresa	AZ	4/4/21
638	Broughman, debra	MI	4/5/21
639	Broughton, Marilyn	MO	4/5/21
640	Browder, Susan	LA	4/8/21
641	Brown, Anne	NC	4/3/21
642	Brown, Arianna	IN	4/1/21
643	Brown, D orothy	MD	4/3/21
644	Brown, Ebie	NY	4/3/21
645	Brown, Jeffrey	AZ	4/10/21
646	Brown, Jill	AZ	4/12/21
647	Brown, John	NC	4/2/21
648	Brown, Joy	AZ	4/7/21
649	Brown, Kevin	OR	4/2/21
650	Brown, Lucy	RI	4/10/21
651	Brown, Mavis	CA	4/5/21
652	Brown, Nancy	CO	4/3/21
653	Brown, Peggy	WA	4/4/21
654	Brown, Valerie	MD	4/6/21
655	Brown, Vera	IA	4/3/21
656	Browning, Craig	CA	4/7/21
657	Brownstein, Sarah	WA	4/14/21
658	Brumbaugh-Cayford, Cheryl	IL	4/5/21
659	Brunelle, Roberta	MA	4/11/21
660	Bryan, Melissa	WI	4/6/21
661	Bryant, Donna	TX	4/3/21
662	Bugash, Virginia	SD	4/5/21
663	Bugbee, G	CT	4/6/21
664	Bujold, Jeanette	OH	4/5/21
665	Bull, Barbara	WA	4/4/21
666	Bullard, James	NY	4/7/21
667	Bullis, Kay	TX	4/9/21
668	Bullock, Jan	MT	4/12/21
669	Bullock, Tammy	CA	4/11/21
670	Bumanis, Christy	MD	4/7/21

671	Bunnell, Roy	WA	4/5/21
672	Burbeck, Nancy	MA	4/7/21
673	Burch, Susan	KY	4/7/21
674	Burda, Katarina	CA	4/3/21
675	buresh, harold	WA	4/5/21
676	Burge, Sharon	OR	4/14/21
677	Burgess, Dana	DC	4/10/21
678	Burgess, David	TX	4/3/21
679	Burgess, Kelly	FL	4/6/21
680	Burgess, Richard	FL	4/9/21
681	Burke, Bronwyn	IN	4/12/21
682	Burke, Patricia	ME	4/13/21
683	Burke, Roger	AR	4/14/21
684	Burke, Russell Burke	CA	4/7/21
685	Burkhardt, Kerry	NY	4/13/21
686	Burns, Vikki	CT	4/7/21
687	Burnside, Rebecca	NV	4/3/21
688	Burris, Karen	PA	4/11/21
689	Burrows, Keith Alan	OH	4/4/21
690	Burrows, N	AK	4/6/21
691	Burton, Lisa	NV	4/5/21
692	Burton, Patricia	MD	4/3/21
693	Busen, Karen	FL	4/5/21
694	Busto, Dennis	CA	4/6/21
695	Butkus, Joann	IL	4/4/21
696	Butler, Susan	MN	4/12/21
697	Buttery, Rickey	FL	4/6/21
698	Bux, Shirley	MD	4/10/21
699	Buxton, Donald	NM	4/13/21
700	Buyarski, Doris	WI	4/8/21
701	Byerly, Barb	VA	4/7/21
702	Byerly, Rhonda	OK	4/3/21
703	Byknish, Chris	OH	4/7/21
704	Byrd, Ruth	OH	4/13/21
705	C l o s s o n, Earl	IA	4/3/21
706	Cabot, Crystal	NC	4/4/21
707	Cabral, M Anthony	LA	4/6/21
708	Cabrera, Rosemary	AZ	4/14/21
709	Cadway, Ruthie	CA	4/7/21

710	Cafagna, Phyllis	IL	4/4/21
711	Cage, Louis	FL	4/3/21
712	cahill, victoria	AZ	4/11/21
713	Cain, Mary	CO	4/10/21
714	CALAHAN, KEVIN	OH	4/9/21
715	Caldwell, Cheri	WA	4/10/21
716	Calvachio, Lucy	NY	4/11/21
717	Cambria, Joan	NJ	4/3/21
718	Camele, Mary	OH	4/5/21
719	Cameron, Cindy	IA	4/4/21
720	Camp, Janelle	MN	4/3/21
721	Campbell, Gregory	MI	4/11/21
722	campbell, mary	SC	4/3/21
723	Campbell, Michelle	CA	4/14/21
724	Campbell, Nancy	VA	4/2/21
725	Campbell, Sandra Campbell	FL	4/3/21
726	Campbell, Teresa	NM	4/5/21
727	Campbell, Therese	NV	4/9/21
728	Canada, Susan	FL	4/5/21
729	Candee, Nancy	CA	4/9/21
730	Cannon, Debbie	TN	4/4/21
731	Cannon, Kelsey	UT	3/31/21
732	Cannon, Patricia	AL	4/3/21
733	Cantu, Roel	TX	4/10/21
734	Cantu, Roel	TX	4/4/21
735	Cantwell, Greg	NV	4/3/21
736	Canzoneri, Tony	OH	4/3/21
737	Caputa, Donna J	CT	4/8/21
738	Carabasi, Ralph	NJ	4/5/21
739	Carbah, Raymond	KS	4/12/21
740	Carbley, William	FL	4/5/21
741	Carbo, Liliana	FL	4/9/21
742	Card, Kathleen	PA	4/3/21
743	Carleton, Cathy	NY	4/11/21
744	Carlson, Cheri	WA	4/4/21
745	Carlson, Cynthia	WI	4/4/21
746	Carlson, Dennis	PA	4/6/21
747	Carlson, Joel	WA	4/4/21
748	carlson, Nancy	MN	4/7/21

749	Carlson, Sandra	AZ	4/7/21
750	Carnal, Jim	CA	4/4/21
751	Carney, Lanie	CA	4/5/21
752	Carney, Michael	NJ	4/14/21
753	Carpenito, Lisa	MA	4/11/21
754	Carpenter, Joshua	WV	4/6/21
755	Carpenter, Laura	WA	4/7/21
756	Carr, Kaitlyn	AR	3/30/21
757	Carr, Mike	CO	4/6/21
758	Carrier, Timothy	UT	4/7/21
759	Carrion, Donna	FL	4/12/21
760	Carroll, Mark	WI	4/5/21
761	Carroll, Mary	IL	4/2/21
762	Carroll, Sara	NV	4/6/21
763	CARRUTH, BONNIE	CA	4/13/21
764	Carter, Donna	MI	4/2/21
765	Carter, Ken	NC	4/4/21
766	Carter, Nancy	AL	4/9/21
767	Cartier, Melvin	MN	4/7/21
768	Cartwright, Glen	CA	4/12/21
769	Caruso, John	OH	4/6/21
770	Cary, Elissa	OH	4/13/21
771	Case, Corinne	NM	4/4/21
772	Case, Nancy	FL	4/3/21
773	Cason, Carola	KY	4/11/21
774	Cassady, Vicki	MO	4/3/21
775	Castiglia, Denise	TX	4/8/21
776	Castillo, Elizabeth	CT	4/6/21
777	Castriota, Linda	CT	4/3/21
778	Castro, Roberto	CO	4/3/21
779	Cavallo, Janet	PA	4/3/21
780	Cave, Robin	IA	4/8/21
781	Caverly, Dorothy	MA	4/3/21
782	Cawley, C.	CA	4/10/21
783	Cawood, Gin	MI	4/3/21
784	Cechota, Madonna	MN	4/6/21
785	Cedar, Nance	NM	4/10/21
786	Cella, Francine	IL	4/14/21
787	cellucci, pam	CA	4/13/21

788	Cencula, David	NV	4/4/21
789	Cerullo, John	NY	4/7/21
790	Cervi, Jean	PA	4/11/21
791	Chaffey, William	MO	4/14/21
792	Chaffin, Lora	OH	4/5/21
793	Chalker, Mikki	NY	4/14/21
794	Chamberlain, Marlene	NH	4/11/21
795	Chamberlin, Connie	TX	4/6/21
796	Chambers, Anne	PA	4/5/21
797	Chambers, Bonita	FL	4/5/21
798	Chambers, George	UT	4/12/21
799	Chambo, Tim	GA	4/2/21
800	Chandler, Taunjia	OR	4/6/21
801	Chandonnet, Anthony	MI	4/3/21
802	Chaney, Heather	VA	4/4/21
803	Chapman, Cathy	MO	4/8/21
804	Charkowski, Elaine	CA	4/3/21
805	Chase, Maria	IL	4/5/21
806	Chavez, salissa	AZ	4/5/21
807	Chazin, Maura	PA	4/7/21
808	Cheffi, Gisele	MD	4/8/21
809	Cherrington, Christie	OH	4/12/21
810	Chevillon, Estelle	CA	4/5/21
811	Chiavola, Kathy	TN	4/12/21
812	Chihuahua, Kate	CO	4/1/21
813	Childress, Janet	MT	4/6/21
814	Childs, Timber	ID	4/1/21
815	Chin, Bebe	WA	4/4/21
816	Chittim, Veroune	OR	4/5/21
817	Chlubna, Jim	MI	4/4/21
818	Chmielewski, Christine	MA	4/3/21
819	Choate, James	OK	4/10/21
820	Chock, Steven	HI	4/10/21
821	Chow, Keely	AL	4/7/21
822	Chow, Keely	AL	4/14/21
823	Chrismon, Phillip	TX	4/10/21
824	Christensen, Maureen	FL	4/3/21
825	Christie, Terry	IN	4/10/21
826	Church, Janelle	WA	4/3/21

827	Churchill, Robert	IA	4/9/21
828	Ciabattari, Iris	AR	4/5/21
829	Cipperly, Carolyn	CO	4/10/21
830	Cipperly, Carolyn	CO	4/9/21
831	Claeys, Mary	MO	4/9/21
832	Clancy, Kathaleen	OR	4/3/21
833	Clancy, Patrick	IL	4/3/21
834	Clanton, Kaye	AR	4/12/21
835	Clark, Catherine	IL	4/2/21
836	Clark, Christopher	WI	4/2/21
837	Clark, Jewel	FL	4/10/21
838	Clark, Mary	WA	4/13/21
839	Clark, Nancy K	NC	4/9/21
840	Clarke, Annie	CA	4/5/21
841	Clarke, Tamara	WA	4/3/21
842	Clarkson, Debbie	NV	4/6/21
843	Clay, Johnny	MT	4/7/21
844	Clayborne, Christine	VA	4/3/21
845	Claycomb, G	IN	4/6/21
846	Cleary, Vanna	PA	4/9/21
847	Clement, Cynthia	RI	4/3/21
848	Clendenen, Cindy	IL	4/3/21
849	Cloud, Jarrett	NJ	4/13/21
850	Cloutier, Kathleen	WI	4/8/21
851	Clune, Ann	NY	4/11/21
852	Clune, Ann	NY	4/5/21
853	Coakley, Terry	CA	4/11/21
854	Cobb, Sandra	OH	4/11/21
855	Coburn, Della	AK	4/4/21
856	Coe, Eileen	FL	4/9/21
857	Coffey, Mary	NC	4/13/21
858	Coffin, Regina	FL	4/12/21
859	Cohen, Judith	AZ	4/10/21
860	Coil, Ruth	NY	4/3/21
861	Coil, Sandra	MO	4/13/21
862	Coiner, Diane	SC	4/3/21
863	Colangelo, Gloria	SC	4/13/21
864	COLBORN, REBECCA	IL	4/8/21
865	Colburn, Jimmie	CA	4/4/21

866	Cole-Hatchard, Reid	NY	4/4/21
867	Cole, Daniel	MD	4/3/21
868	Cole, Margery	MA	4/5/21
869	Cole, Sandra	WA	4/9/21
870	Cole, Shelley	MI	4/5/21
871	Coleman, Brien	CT	4/6/21
872	Collens, Joanne	WA	4/3/21
873	Collett, Derek	OH	4/11/21
874	Collins, Barbara	WA	4/3/21
875	Collins, Debbie	NC	4/4/21
876	Collins, Jane	NY	4/4/21
877	Collins, Jane	NY	4/2/21
878	Collins, Joseph	NY	4/4/21
879	Collins, Ken	AL	4/4/21
880	Collins, Peggy	MI	4/8/21
881	Collins, Peggy S.	MI	4/5/21
882	Collins, Susan	IA	4/8/21
883	Collins, William	NC	4/6/21
884	Colvin, Connie	NY	4/7/21
885	Combs, Mitzi	NC	4/11/21
886	Conger, Barrie	NC	4/3/21
887	Conley, Tom	NY	4/6/21
888	Conn, Kelly	IN	4/6/21
889	Connelly, Kelly	FL	4/6/21
890	Conner, Marianna	CO	4/3/21
891	Connor, Phillip	NY	4/4/21
892	Connors, JV	NM	4/7/21
893	Consaul, Cathy	TX	4/13/21
894	Coogan, Bob	OR	4/6/21
895	Coogan, Joyce	CO	4/6/21
896	Coogan, Peg	NY	4/3/21
897	Cook, Marilyn	SC	4/4/21
898	Cook, Mary	CA	4/9/21
899	Cook, Patricia	OH	4/2/21
900	Cook, Robert	MI	4/3/21
901	Cook, Sean	IL	4/4/21
902	Cookman, Dick	MI	4/14/21
903	Cookson, Diana	ME	4/7/21
904	coolbeth, Philip	VT	4/5/21

905	Coombes, Jackie	NM	4/12/21
906	Cooper, James	OH	4/7/21
907	Copenhaver, Ernest	FL	4/6/21
908	Copley, Margaret	OK	4/3/21
909	Copp, Eric	AZ	4/7/21
910	Coppersmith, Terri	MD	4/3/21
911	Coppola, Norman	NY	4/4/21
912	Corbett, Anneke	MA	4/8/21
913	Corcoran, Linda	FL	4/10/21
914	Corkery, Landry	WA	4/2/21
915	Corley, Bruce	TX	4/3/21
916	Corliss, Heather	CA	4/5/21
917	Cormany, Erin	CO	4/4/21
918	Cornaire, Irish	NY	4/9/21
919	Corniea, Anne	MN	4/4/21
920	Correia, Richard	ME	4/3/21
921	Corry, Aline	TX	4/3/21
922	Cortazzo, Janis	FL	4/12/21
923	Cortez, Pablo	UT	4/7/21
924	Cosby, Joe Skye	TX	4/10/21
925	Coss, Shelley	VA	4/9/21
926	costa, lynn	RI	4/4/21
927	Cote, Barbara Cote	MI	4/9/21
928	Cote, Manon	NM	4/12/21
929	Coughlin, Maureen	MA	4/3/21
930	Couls, Robert	HI	4/8/21
931	Councilman, David	MN	4/6/21
932	Countryman, Alan	MN	4/3/21
933	Courselle, Sharon	NY	4/6/21
934	Coursey, Cheri	OR	4/7/21
935	couture, Jane	WY	4/4/21
936	Covey, John	AR	4/6/21
937	Coveyou, Terry	MI	4/11/21
938	Cowan, Kathy	IL	4/6/21
939	Cowie, George	CA	4/12/21
940	Cox, Carol	NC	4/8/21
941	Cox, Heidi	CO	3/31/21
942	Cox, Linda	CO	4/3/21
943	Cox, Rosalie	PA	4/2/21

944	Coy, Barbara	FL	4/3/21
945	Cozine, Deborah	IA	4/3/21
946	Crabb, Robert	MN	4/13/21
947	Cramer, William	WI	4/2/21
948	Cratty, Mariah	TN	4/7/21
949	Crawford-Poyner, Deborah	MI	4/4/21
950	Crenshaw, Shirley Resnick	MO	4/8/21
951	Crescenzo, Janine	NY	4/5/21
952	Crevola, Ali	OR	4/13/21
953	Crews, Donald	FL	4/5/21
954	Crim, Edwin	OH	4/10/21
955	Crist, Dawn	PA	4/4/21
956	Critser, Jackie	WA	4/5/21
957	Crocker, Mary	TX	4/10/21
958	Crofts, Elizabeth	UT	4/4/21
959	Crogan, John	FL	4/7/21
960	Crosby, Kathy	NC	4/11/21
961	Cross, Dave	MI	4/8/21
962	Cross, Myrtle	AZ	4/13/21
963	Cross, Ronald	CA	4/3/21
964	Crossway, Anne	CA	4/9/21
965	Crouse, Nicholas	OK	3/31/21
966	Crow, Julie	CA	4/5/21
967	CROWELL, Beth	MA	4/13/21
968	Cuevas, Gloria	CA	4/4/21
969	Cumming, Cheyne	SD	4/8/21
970	Cummings, Debra	IN	4/10/21
971	Cummings, Joan	CT	4/4/21
972	Cummings, Paula	FL	4/5/21
973	Cupples, David	CA	4/12/21
974	Currie, Derek	NY	4/12/21
975	Custer, Dorothee	FL	4/10/21
976	Cutaia, Pamela	WI	4/10/21
977	Cutlip, Marie Cutlip	OH	4/3/21
978	Cutter, Denise	NY	4/7/21
979	Cutts, Matt	TN	4/8/21
980	Cwick, Richard and	NY	4/5/21
981	Cysewski, Janette	WI	4/3/21
982	D, Claire	PA	4/12/21

983	D, Donna	CO	4/2/21
984	D, Elizabeth	CT	4/4/21
985	D, Lyn	CO	4/7/21
986	D, T	MD	4/11/21
987	D., Laura	GA	4/2/21
988	Dague, Michael	WA	4/4/21
989	Dailey, Laura	NY	4/14/21
990	Dalin, Laura	MN	4/6/21
991	Dalla, Andrea	CO	3/30/21
992	Dallin, Eric	MS	4/12/21
993	Damaschke, Gail	MI	4/11/21
994	Damon, Pat	MI	4/5/21
995	Dancingwolf, Karlene	CO	4/4/21
996	Daniel Beck, Daniel	PA	4/6/21
997	Daniel, Mary	VA	4/8/21
998	DAnna, Marie	NJ	4/11/21
999	danner, samuel	PA	4/5/21
1000	Daratony, David	MI	4/14/21
1001	Darlington, Kimble	CA	4/10/21
1002	Darrow, Delana	IL	4/12/21
1003	Datri, Betsy	OR	4/10/21
1004	Davenport, Karla	IA	4/11/21
1005	Davenport, Patricia	TN	4/9/21
1006	Davidson, Keara	WY	4/7/21
1007	Davidson, Keara	WY	4/11/21
1008	Davies, Beverly	IL	4/3/21
1009	Davies, Doreen	NV	4/11/21
1010	Davies, Nancy	OR	4/10/21
1011	Davies, Steven	MT	4/11/21
1012	Davis, A	FL	4/9/21
1013	Davis, Bob	CA	4/4/21
1014	Davis, Carol	FL	4/2/21
1015	Davis, David	KS	4/6/21
1016	Davis, Dianne	AL	3/30/21
1017	Davis, E Myles	MA	4/3/21
1018	DAVIS, GAIL	NV	4/14/21
1019	Davis, Jean	WA	4/2/21
1020	Davis, JoAnne	VT	4/10/21
1021	Davis, Julie	OR	4/10/21

1022	Davis, Karen	FL	4/4/21
1023	Davis, Karen	FL	4/9/21
1024	Davis, Kathleen	MI	4/11/21
1025	Davis, Margaret	FL	4/6/21
1026	davis, michaela	VT	4/6/21
1027	Davis, Peter Franklin	MA	4/7/21
1028	Davis, Thomas	IL	4/5/21
1029	Davis, Todd	OH	4/4/21
1030	Davis, Vera	CO	4/6/21
1031	Davis, Vincent	MO	4/4/21
1032	Daw, Leila	CT	4/3/21
1033	Dawson, Dawn	WI	4/4/21
1034	Dawson, Peggy	PA	3/31/21
1035	Dawson, Sharon	TX	4/11/21
1036	Dawson, Valerie	PA	4/4/21
1037	Day, Susan	VT	4/2/21
1038	de Crescentis, James	MA	4/8/21
1039	De Heus, Cerelda	TX	4/5/21
1040	Dean, Suzanne	MA	4/3/21
1041	DeAngelis, Eileen	PA	4/4/21
1042	DeAngelis, Irene	CO	4/3/21
1043	Debarea, connie	KS	4/8/21
1044	DeBoni, Thomas	FL	4/3/21
1045	DeBusk, Lynn	FL	4/13/21
1046	Decaprio, Ethan	CO	4/5/21
1047	DeCoursey, Jacob	MD	4/11/21
1048	decunzo, Mary	FL	4/7/21
1049	Dee, Mike	NV	4/4/21
1050	Deen, Daysha	CA	4/5/21
1051	Deering, Michelle	CA	4/13/21
1052	Defilippo, Pamela	CT	4/5/21
1053	DeFosset, Kellie	IL	4/4/21
1054	Deines, Sandy	OR	4/5/21
1055	Del Toro, Romanita	NV	4/3/21
1056	Delaplaine, Kirk	NM	4/3/21
1057	DELEON, Jaime	CA	4/4/21
1058	DeLeona, Leyenda	WA	4/14/21
1059	Delger, Mary	MA	4/11/21
1060	Deller, Jeanne	WA	4/7/21

1061	DeLucas, Kathleen	IN	4/9/21
1062	DeLuna, Joann	TX	4/3/21
1063	Demos, DARCIA	WI	4/4/21
1064	Dempsey, Melinda	KS	4/13/21
1065	Dennis, Beverly	PA	4/3/21
1066	Denniston, Suz	PA	4/4/21
1067	Denny, Kim	MI	4/6/21
1068	Denslow, Barbara	FL	4/6/21
1069	DePriest, Bridget	IL	4/3/21
1070	Deptula, Cathy	FL	4/3/21
1071	DeQuasie, David	FL	4/2/21
1072	DeQuinzio, Anthony	OR	4/8/21
1073	Derrough, Patricia	NC	4/8/21
1074	DeSchepper, Rhea	MO	4/3/21
1075	DeSelm, Ashley	IN	4/9/21
1076	Deshotel, James	MO	4/7/21
1077	Despres, Christine	MA	4/6/21
1078	DeVier, Marcia	MO	4/4/21
1079	Devonshire, Lauren	PA	4/9/21
1080	DeVoss, Troy	SD	4/5/21
1081	DeVries, Robert	MI	4/4/21
1082	DeWitt, Linda	AL	4/4/21
1083	DeWitt, Mary	AR	4/9/21
1084	Di ILIO, Virginia	PA	4/9/21
1085	diamond, Cheryl	WA	4/7/21
1086	Dibblee, Patricia	OR	4/3/21
1087	Dibisceglie, Sharon	FL	4/4/21
1088	DiCiccio, Michele	NY	4/12/21
1089	Dickenson, Muriel S.	MN	4/5/21
1090	Dickson, Brenda	CO	4/6/21
1091	Dickson, Nathaniel	WI	4/8/21
1092	Dicus, Laura	WA	4/2/21
1093	Diem, Rachel	MI	4/11/21
1094	Diemer, Anne	MT	4/3/21
1095	Diercks, Mary Ann	MN	4/11/21
1096	DiGiovanni, Jayme	NY	3/30/21
1097	Dillon, Howard	CA	4/4/21
1098	Dillon, Patrick	IL	4/11/21
1099	Dills, Eric	CA	4/13/21

1100	Dilworth, Bari	MI	4/4/21
1101	DiMarzo, Frank	MA	4/4/21
1102	Dimpfl, Melissa	TX	4/12/21
1103	Din, Carol	NJ	4/11/21
1104	Dinale, Martina	AL	4/10/21
1105	Dircks, Nancy	NY	4/1/21
1106	Dirks, Gary	WA	4/4/21
1107	Dixon, Eric	CO	4/8/21
1108	Dixon, Tinamarie	MD	4/3/21
1109	DOANE, BRIAN	MA	4/4/21
1110	Dobbyn, Dorothy	DE	4/2/21
1111	Dobiel, Michael	MA	4/5/21
1112	DODSON, CARRIE	WV	4/3/21
1113	Dodson, Ethel	VA	4/3/21
1114	Doering, Edward	NJ	4/8/21
1115	Dokken, Elizabeth	MN	4/12/21
1116	Dolian, Sue	MN	4/6/21
1117	Doll, Mitch	PA	4/10/21
1118	Domenig, Kathleen	PA	4/13/21
1119	Dominica, Susan	CO	4/10/21
1120	Donelan, Frances	FL	4/6/21
1121	Donkin, Sallie	CT	4/2/21
1122	Donnadio, Doris	PA	4/3/21
1123	Donohue, Patricia	VA	4/10/21
1124	Donovan, Charlene	WA	4/6/21
1125	Dorfman, Nancy	PA	4/4/21
1126	Dorris, Virginia	MD	4/3/21
1127	Doss, Harley	IL	4/9/21
1128	dossena, pier	FL	4/1/21
1129	Dotson, Benita	AZ	4/13/21
1130	Dotson, Benita	AZ	4/11/21
1131	Dotterer, Gary	PA	4/12/21
1132	Doubleday, Peri	AR	4/5/21
1133	Doucette, Debra	MA	4/8/21
1134	Dougherty, Hope	WI	4/11/21
1135	Douglas, Janice	FL	4/9/21
1136	Douglas, John	CA	4/13/21
1137	Douglas, June	OH	4/2/21
1138	Douma, Brice	NY	4/12/21

1139	Douton, Holly	NV	4/3/21
1140	Dove, Patricia	MD	4/5/21
1141	Dow, Lois	CO	4/3/21
1142	Dow, Val	NM	4/2/21
1143	Downarowicz, Walter	CA	4/5/21
1144	Downing, Richard	ID	4/2/21
1145	Downs, Nancy	NM	4/13/21
1146	Downs, Patty	MA	4/3/21
1147	Downs, Tyschka	MD	4/11/21
1148	Downs, Tyschka	MD	4/2/21
1149	Doyle, Julia	PA	4/3/21
1150	Drake, Carol	CA	4/8/21
1151	Draskiewicz, Duana	NM	4/5/21
1152	Drees, Susan	CO	4/13/21
1153	Dresser, Lynda	MI	4/6/21
1154	Drewke, Lynn	IL	4/7/21
1155	Drummond, Bobby	FL	4/5/21
1156	Dryden, Marlie	MD	4/6/21
1157	Duarte, Erick	KY	4/13/21
1158	DuBose, Kevin	TN	4/7/21
1159	DuCharme, Colette	AK	4/11/21
1160	Ducharme, Holly	FL	4/11/21
1161	Duckett, Kevin	AZ	4/4/21
1162	Duda, John	OR	4/8/21
1163	Dudley, Jill Ann	NV	3/31/21
1164	Duff, Terry	MI	4/8/21
1165	Duffy, Alex	NY	4/13/21
1166	Duffy, Simona	TX	4/11/21
1167	Dunbar, Valarie	KS	4/6/21
1168	Duncan, Renee	FL	4/12/21
1169	Dungan, Patricia	AZ	4/4/21
1170	Dunleavy, Sheila	NJ	4/3/21
1171	Dunn, Julie	IN	4/4/21
1172	Dunne, David	WA	4/5/21
1173	Dupont, Susan	LA	4/3/21
1174	Duran, Candace	NM	4/4/21
1175	Durand, Travis	CO	4/8/21
1176	Durkin, Paul	FL	4/11/21
1177	Dutra-Blackledge, Jan	CA	4/13/21

1178	DuVall, Tanja	MI	4/7/21
1179	Dwight, Jeanne	NE	4/3/21
1180	Dworaczyk, Debra	CA	4/4/21
1181	Dwyer, John	IL	4/7/21
1182	Dwyer, Patrick	NY	4/6/21
1183	Dykhuis, Shirley	TX	4/11/21
1184	Dysard, Vickie	PA	4/3/21
1185	Eads, Kathleen	IN	4/3/21
1186	Eales, Kathleen	MI	4/3/21
1187	East, Turns	ID	4/4/21
1188	Easterberg, Gretchen	WA	4/5/21
1189	Eastmond, Belinda	UT	4/10/21
1190	Eat n, Jennifer	CA	4/6/21
1191	Eaton, Linda	AZ	4/5/21
1192	Eaton, Tim	CT	4/2/21
1193	Ebersole, Jan	MI	4/12/21
1194	Echols, Sylvia	OR	4/4/21
1195	Eckert, Pamela	KY	4/10/21
1196	Eddy, Kati J	NM	4/6/21
1197	Eddy, Lisa	CA	4/6/21
1198	Edelman-Tolchin, Gayle	FL	4/3/21
1199	Edgerton, Craig	CO	4/9/21
1200	Edwards, Colleen	NY	4/4/21
1201	Edwards, Eleanor	MA	4/5/21
1202	Edwards, Libby	NY	4/9/21
1203	Edwards, Robert	PA	4/10/21
1204	edwards, william	MI	4/8/21
1205	Eells, Victoria	OR	4/3/21
1206	Egan-Robertson, Anne	WI	4/6/21
1207	Egan, Karen	FL	4/12/21
1208	Eggerton, Aurora	OH	4/8/21
1209	eggleston, Richard	IA	4/2/21
1210	Ehrnman, Sammy	CA	4/3/21
1211	Eiben, Thomas	NY	4/8/21
1212	Eisele, Richard	MI	4/13/21
1213	Eisele, Ted	ID	4/5/21
1214	Ekman, Lea	DE	4/3/21
1215	Eldredge, Scott	ME	4/11/21
1216	Elizer, Elvira	GA	4/3/21

1217	Elkin, Susan	MN	4/5/21
1218	Eller, K	PA	4/5/21
1219	Ellis, E	WA	4/4/21
1220	Ellis, Eric	IN	4/14/21
1221	Ellis, Janet	OR	4/3/21
1222	Ellis, Lynn	CA	4/6/21
1223	Elliser, Michael	FL	4/6/21
1224	Ellison, Catherine	MS	4/11/21
1225	Ellram, Alex	NY	4/4/21
1226	Elmore, Mimi	CO	4/3/21
1227	Elmore, Shane	WV	4/11/21
1228	Emenaker, Seth	IN	4/5/21
1229	Emory, Robert	NH	4/13/21
1230	Engelhardt, Laurie	ID	4/7/21
1231	Engelman, Lavonne	NC	4/11/21
1232	Engle, Kathleen	MI	4/4/21
1233	English, Janet	CA	4/11/21
1234	Enomoto, Karen	CO	4/5/21
1235	Enright, Jackie	NJ	4/3/21
1236	Enriquez, Candice	UT	4/2/21
1237	Ensley, Susan	NY	4/9/21
1238	Ently, Sheldon	MN	4/11/21
1239	Epperly, Barbara Epperly	VA	4/11/21
1240	Erdeljac, Joseph	PA	4/5/21
1241	Erfurth, Elizabeth	OR	4/4/21
1242	Ericksen, Sharron	PA	4/2/21
1243	Erickson, L	CO	4/9/21
1244	Escobar, Cheryl	CA	4/6/21
1245	Esposito, Carolyn	PA	4/6/21
1246	Esquivel Sr, Roberto	TX	4/4/21
1247	Esquivel, Amanda	TX	4/3/21
1248	Estabrooke, Marjorie	NY	4/11/21
1249	Estes, Rita	FL	4/3/21
1250	Ethridge, Diane	TX	4/2/21
1251	Etzkorn, Glen	IL	4/11/21
1252	Evans Jr, Leonard	CA	4/8/21
1253	Evans-Ford, Sharon	TX	4/4/21
1254	EVANS, CAROLYN	KY	4/3/21
1255	Evans, Heidi	UT	4/11/21

1256	Evans, Jennifer	PA	4/11/21
1257	Evans, Teresa	MS	4/3/21
1258	Evans, Terry	OR	4/5/21
1259	Everhart, Barbara	NC	4/3/21
1260	Evert, Herb	WI	4/2/21
1261	Evinczik, Eric	NY	4/9/21
1262	Evinczik, Eric	NY	4/4/21
1263	Ewald, Joan	PA	4/4/21
1264	Ewald, Joan	PA	4/11/21
1265	Ewing, Lois	MO	4/10/21
1266	Eyler, Barbara	CO	4/1/21
1267	F Austin, Karen	FL	4/3/21
1268	Fadeley, John	OH	4/2/21
1269	Fahy, Elizabeth	FL	4/4/21
1270	Fain, Karen	GA	4/2/21
1271	Falcon, Ruth	WA	4/10/21
1272	Falcone, Janet	KY	4/3/21
1273	Falconi, Gloria	CO	4/12/21
1274	Falk, Margaret	AZ	4/6/21
1275	Falkenstien, Marty	AR	4/3/21
1276	Falkenthal, Elizabeth	GA	4/4/21
1277	Fanara, Dean	WA	4/7/21
1278	Fannin, Lori	OH	4/9/21
1279	Fanning, Carol	CT	4/4/21
1280	Farmer, Deborah	GA	4/8/21
1281	Faron, Mary	CO	4/14/21
1282	Farr, Tracy	MN	4/14/21
1283	Farrow, Rita	WV	4/8/21
1284	Faulkner, Renee	CO	4/13/21
1285	Fauquier, Susan	IA	4/4/21
1286	Fear, Patricia	PA	4/10/21
1287	Feasel, Edna	OH	4/12/21
1288	Feeley, Patricia	RI	4/11/21
1289	Feldman, Tina	FL	4/12/21
1290	Fellows, Cassandra	TX	4/11/21
1291	Fennel, Bonnie	WA	4/12/21
1292	Fenwick, Greg	WA	4/12/21
1293	Ferbert, Elizabeth	TX	4/12/21
1294	Ferendo, Cheryl	MD	4/3/21

1295	Fergeson, Cheryl	UT	4/5/21
1296	Ferguson, Layne	TX	4/9/21
1297	Ferguson, Nadina	OH	4/5/21
1298	Ferguson, Nancy	MI	4/10/21
1299	Ferm, Samantha	IA	4/13/21
1300	FERNANDEZ, SANDRA	FL	4/12/21
1301	Ferrari, Angela	AK	4/12/21
1302	Ferris, Kathleen	NC	4/12/21
1303	Ferris, Ken	NY	4/6/21
1304	Fertsch, Joy	OR	4/10/21
1305	Fess, Jeannemarie	NY	4/12/21
1306	Fetterhoff, Sheila	MA	4/5/21
1307	fetters, kim	PA	4/6/21
1308	Fiallos, Maria	OR	4/13/21
1309	Fian, Robbee	NY	4/13/21
1310	Fian, Robbee	NY	4/13/21
1311	Fickling, John	NY	4/9/21
1312	Fidler, Christine	CO	4/3/21
1313	File-Kennedy, Deanna	NJ	4/4/21
1314	Filion, Deborah	FL	4/4/21
1315	Filion, Deborah	FL	4/5/21
1316	Filoti, Ray	NH	3/31/21
1317	Finale, Martina	AL	4/5/21
1318	Finer, Gregory	OH	4/9/21
1319	Finkbeiner, Theresa	FL	4/8/21
1320	Finnerty, Eugene	CA	4/12/21
1321	Fischer, William	MO	4/12/21
1322	Fisher, Denise	MI	4/13/21
1323	Fisher, Helen	NC	4/12/21
1324	Fisher, Jerry	CA	4/3/21
1325	Fisher, Karen	WA	4/5/21
1326	Fisher, Thomas	IA	4/5/21
1327	Fiske, Constance	MT	4/10/21
1328	Fite, Gregory	CA	4/4/21
1329	Fitzpatrick, Peter G	PA	4/6/21
1330	Fitzpatrick, Sandra	CO	4/10/21
1331	Fitzpatrick, Sjoran	NM	4/9/21
1332	Flanders, Colleen	VT	4/7/21
1333	Flanders, Patricia	AZ	4/8/21

1334	Fleche, Timothy	NY	4/3/21
1335	Fleming, Mary	OR	4/5/21
1336	Fleming, Susan	IL	4/6/21
1337	Flesher, Robert	MI	4/6/21
1338	Fleszar, Marie	MI	4/8/21
1339	Fletcher, Michele	CA	4/7/21
1340	Fletcher, Michele	CA	4/12/21
1341	Flint, Patricia	FL	4/5/21
1342	Flock, Joyce	MN	4/3/21
1343	Floeh, Tracy	MO	4/8/21
1344	Flores, Eleanor	TX	4/14/21
1345	Flowers, Deanna	FL	4/6/21
1346	Flynn, Irma	CO	4/5/21
1347	Flynn, Patricia	IA	4/6/21
1348	Fogarty, C.J.	FL	4/5/21
1349	Foley, Marti	DE	4/6/21
1350	Foley, T M	PA	4/2/21
1351	Fong, Sharon	NV	4/3/21
1352	fonseca, Simone	CA	4/3/21
1353	Ford, Charles	OH	4/9/21
1354	Forsythe, Elizabeth	NV	4/3/21
1355	Forte, Kerri	PA	3/30/21
1356	Fortenbaugh, Alicia	OH	4/7/21
1357	Foster, Alice	AZ	4/3/21
1358	Foster, Debbie	MO	4/8/21
1359	Foster, Jacqui	IL	4/4/21
1360	Foster, Kim	NM	4/13/21
1361	Foster, Laura	VA	4/3/21
1362	Foster, Susan	OR	4/2/21
1363	Foster, Trish	FL	4/11/21
1364	Foust, Heather	TN	4/11/21
1365	Foutty, Laurie	ID	4/10/21
1366	Fowler, Deirdre	FL	4/8/21
1367	Fowler, Elizabeth	OR	4/6/21
1368	Fox, Connie	WV	4/3/21
1369	Fox, Patricia	NY	4/9/21
1370	Frame, Chris	WA	4/9/21
1371	Francis, Marta	IN	4/4/21
1372	Franco, Pamela	NE	4/10/21

1373	Francois, Ellen	NJ	3/30/21
1374	Frank, Lorelei	CA	4/9/21
1375	Frank, Melissa	FL	4/7/21
1376	Frank, Mitzi	OH	4/11/21
1377	Frank, Robert	LA	4/10/21
1378	Frankl Reicks, Janella	TX	4/2/21
1379	Franklin, Anne	MN	4/3/21
1380	Franklin, Audrey	CO	4/4/21
1381	Franklin, Audrey	CO	4/5/21
1382	Franklin, Margaret	TN	4/13/21
1383	Frantz, Myrna	TX	4/9/21
1384	Franzman, Linda	CA	4/11/21
1385	fraser, Ann	NY	4/11/21
1386	Frazier, Julie	IN	4/5/21
1387	Frease, Sara	OH	4/10/21
1388	Frederick-Neznek, Donna	CT	4/4/21
1389	Fredericks, Patti	MD	4/11/21
1390	Free, Cherie	TN	4/11/21
1391	Freeby, Arloa	TX	4/3/21
1392	Freels, Carla	GA	4/12/21
1393	Freeman, Jackie	IL	4/6/21
1394	Freeman, Linda	MA	4/11/21
1395	Freeman, Robert	FL	4/3/21
1396	French, Dawn	MI	4/4/21
1397	French, Elaine	NH	4/14/21
1398	French, Robert	IL	4/11/21
1399	Fretheim, Paul	CA	4/6/21
1400	Frey, Richard	PA	4/2/21
1401	Frey, Richard	PA	4/2/21
1402	Fricano, Marian	CA	4/5/21
1403	Frick, Aaron	CO	4/1/21
1404	Fried, Susan	WA	4/7/21
1405	fries, Jeb	NY	4/12/21
1406	Frishman, Inbar	NY	4/10/21
1407	fritsch, corinna charlotte	AZ	4/14/21
1408	Frohwerk, Jo	FL	4/4/21
1409	Fromberg, Jeff	CA	4/3/21
1410	Frost, Ej	VT	4/11/21
1411	Frost, Robert	AZ	4/8/21

1412	Fugit, Sherri	IN	4/4/21
1413	Fullerton, Rebecca	PA	4/3/21
1414	Fundak, Marsha	OH	4/9/21
1415	Funk, Billie	PA	4/10/21
1416	Futrick, Wendy	PA	4/4/21
1417	g, b	OR	4/3/21
1418	Gaboury, Janine	MN	4/3/21
1419	Gaboury, Janine	MN	4/10/21
1420	Gabriel, John	WA	4/3/21
1421	Gabriele, Tyler	IN	4/9/21
1422	Galbreath, Kim	VA	4/9/21
1423	Galica, Antonio	NY	4/9/21
1424	Galindo, Lauryn	HI	4/10/21
1425	Gallagher, Sarah	CT	4/5/21
1426	Gallant, Bev	ME	4/10/21
1427	Gallego, Yolanda	DE	4/6/21
1428	Gallup, Earl	FL	4/7/21
1429	Galvin, Carol	WV	4/11/21
1430	Gan, Daniel	IA	4/5/21
1431	ganMoryn, Croitiene	FL	4/3/21
1432	Gantz, Bonnie	ME	4/6/21
1433	Garbarino, Lisa	NJ	4/3/21
1434	Garcia, Claudia	TX	4/1/21
1435	Garcia, Isabel	FL	4/7/21
1436	Garcia, Mary	OR	4/5/21
1437	Garcia, Suz	WA	4/11/21
1438	Garden, Mike	CA	4/9/21
1439	Gardner, Barbara	MI	4/5/21
1440	Gardner, Helen	AZ	4/3/21
1441	Gardner, Michelle	CA	4/4/21
1442	Gardner, Nancy	CA	4/12/21
1443	Gargus, Dan	OH	4/5/21
1444	Garlock, Doug	OR	4/8/21
1445	Garrlick RN, Susie	MI	4/13/21
1446	Gartner, Crystal	WA	4/5/21
1447	Garvin, Susan	FL	4/14/21
1448	Garza, Lynn	FL	4/3/21
1449	Gasperment, Nancy	FL	4/6/21
1450	Gates, Jan	CA	4/7/21

1451	Gathright, Donna	VA	4/7/21
1452	Gauger, Nancy	WI	4/14/21
1453	Gaus, Donna	KY	4/9/21
1454	Gavin, Cheryl	WA	4/3/21
1455	Gay, Sonja	PA	4/9/21
1456	Gayer, Doreen	CT	4/5/21
1457	Gazzana, Greg	FL	4/13/21
1458	Geary., Eileen	CT	4/8/21
1459	Gebhardt, Peter	TX	4/8/21
1460	Gear, Jim	OR	4/2/21
1461	Geer, William	MT	4/5/21
1462	Gehris, Janine	IN	4/4/21
1463	geisler, tracey	CA	4/7/21
1464	Gelasi, Sherry	IL	4/2/21
1465	Gelsomino, Rene	LA	4/3/21
1466	geno, deborah	MO	4/12/21
1467	Gentry, Greyling	WA	4/2/21
1468	Gentry, Greyling	WA	4/11/21
1469	Geremia, Margurite	NY	4/3/21
1470	Geremia, Margurite	NY	4/14/21
1471	gergash, Julie	IN	4/6/21
1472	Gerken, Jan	MN	4/6/21
1473	Getchell, Kimberly	MA	4/4/21
1474	Getter, Camile	CA	4/3/21
1475	Geyser, Eric	WA	4/6/21
1476	Ghilotti, Sue	CA	4/5/21
1477	Giansiracusa, Michael	PA	4/10/21
1478	Gibas, Linda	CO	4/6/21
1479	Gibbs, Rachal	WA	4/13/21
1480	Gibelyou, Melinda	WA	4/10/21
1481	Giberson-Smith, Judi	PA	4/4/21
1482	gibson, anneliese	WA	4/6/21
1483	Gifford, Bonnie	OH	4/4/21
1484	Gifford, Elizabeth	MA	4/2/21
1485	Gilbert, Loreta	AR	4/3/21
1486	Gill, Karen	IL	4/10/21
1487	Gill, William	NC	4/13/21
1488	Gillaspie, Kim	CO	4/10/21
1489	Gillette, Eileen	WA	4/5/21

1490	Gilliam, Deloris	TN	4/13/21
1491	Gilliland, Patricia	CO	4/6/21
1492	Gilman, Diane	ME	4/10/21
1493	Gilson, Stacy	WI	4/4/21
1494	Gilstrap, Susan	VA	4/10/21
1495	Gimbrone, Nicholas	VA	4/10/21
1496	Gingras, Brian	MA	4/10/21
1497	Gingras, Brian	MA	4/5/21
1498	Gingrich, Jerri	SC	4/4/21
1499	Gioannini, John	NM	4/6/21
1500	Giovengo, Keren	GA	4/12/21
1501	Girouard, Sandra	MA	4/3/21
1502	Giuffre, Christina	LA	4/9/21
1503	Glass, Becky	WI	4/5/21
1504	Glenn, Constance	CA	4/9/21
1505	Glenn, Julie	MO	4/3/21
1506	Glidewell, Debra	MO	4/3/21
1507	Gloe, Janice	CA	4/3/21
1508	Glosky, Veronika	IL	4/6/21
1509	goble, susan	TX	4/2/21
1510	Gobrick, Dianne	NM	4/5/21
1511	gockowski, marilyn	MN	4/12/21
1512	Godet, Maia	OR	4/4/21
1513	Goehring, Michael	FL	4/3/21
1514	Goertz, Karen	IN	4/11/21
1515	Goetschius, Carol	FL	4/10/21
1516	Goffin, Pam	IL	4/6/21
1517	Goforth, Jacklyn	NV	4/3/21
1518	Gogic, Laurie	WA	4/11/21
1519	Goin, Lynda	WA	4/3/21
1520	Goldberg, Lucy	VA	4/9/21
1521	Golden, Jerry	WA	4/5/21
1522	Goldenberg, Loretta	FL	4/7/21
1523	Goldin, Susan	NY	4/3/21
1524	Goldin, Susan	NY	4/8/21
1525	Gomez, Mike	LA	4/7/21
1526	Gonnerman, Mike	IA	4/4/21
1527	Gonz·lez, Fanny	IL	4/6/21
1528	Gonz·lez, Olga	FL	4/11/21

1529	Gonzales, A	TX	4/11/21
1530	Gonzalez, Alan	CA	4/9/21
1531	Gonzalez, Ibis	NJ	4/6/21
1532	Goodall, Bettina	NY	4/6/21
1533	Goodman, Ellen	RI	4/13/21
1534	Goodwin, Nancy	WA	4/7/21
1535	Gordon, Amanda	FL	4/9/21
1536	Gordon, Bruce	CO	4/5/21
1537	Gore, Jesse	TN	4/5/21
1538	Gorss, James	MA	4/12/21
1539	Gotay, Christine	FL	4/2/21
1540	Gould, Julianne	PA	4/11/21
1541	Gourville, Tracy	NC	4/8/21
1542	Gouty-Yellow, Tina	WI	4/14/21
1543	Gow, Braden	ME	4/9/21
1544	Graber, Jacques	CA	4/8/21
1545	Grace, Dana	CA	4/3/21
1546	Grace, Kathryn	CO	4/6/21
1547	Grady, Patricia	CA	4/4/21
1548	Graff, Wanda	OR	4/11/21
1549	Graham, Heather	FL	4/4/21
1550	Graham, Laurie	CA	4/3/21
1551	Graham, Linda	TX	4/3/21
1552	Grajczyk, Joyce	WA	4/8/21
1553	Gran, Cecilia	MN	4/11/21
1554	Granger, Dwight	TX	4/7/21
1555	Grant, Carol	MI	4/10/21
1556	Grant, Ned	AZ	4/4/21
1557	Graves, Thomas	NY	4/6/21
1558	Gray, Joann	IA	4/9/21
1559	Gray, Judith	IL	4/11/21
1560	Gray, Judith	IL	4/13/21
1561	Green, Diane	FL	4/2/21
1562	Green, Edmond	CA	4/9/21
1563	Green, Gale	IL	4/12/21
1564	Green, Janet	NJ	4/4/21
1565	Green, Karla	CA	4/4/21
1566	Green, Kathe	FL	4/4/21
1567	Green, Mary	WI	4/4/21

1568	green, Molly	MO	4/13/21
1569	Green, Rebecca	FL	4/11/21
1570	Green, Sharon	CO	4/4/21
1571	Greenberg, Andrea	NJ	4/11/21
1572	greenberg, helaine	NV	4/2/21
1573	Greenberg, Janice	TX	4/9/21
1574	Greenberg, Lenore	NY	4/5/21
1575	Greene, David	PA	4/5/21
1576	Greene, Jeff	CO	4/4/21
1577	Greenhut, Marcy	CA	4/7/21
1578	Greenstein, Barry	FL	4/5/21
1579	Greer, Jennifer	FL	4/3/21
1580	Greer, Margaret	FL	4/3/21
1581	Greer, Sylvia	TX	4/3/21
1582	Gregg, Paul	WA	4/3/21
1583	Gregory, Nancy	CO	4/13/21
1584	Greth, Sharen	PA	4/3/21
1585	Grey, Debbie	TX	4/12/21
1586	Greymoon, Deborah	CO	4/9/21
1587	Griffin, Amanda	GA	4/1/21
1588	Griffin, Ghia	OR	4/7/21
1589	Griffin, Glenn and Sandra	NM	4/7/21
1590	griffin, kim	MN	4/13/21
1591	Griffith, Fred	ME	4/13/21
1592	grimm, Debra	NJ	4/9/21
1593	Grimmett, Priscilla	TN	4/5/21
1594	Grissom, Dennis	MO	4/3/21
1595	Groff, Donald	NY	4/5/21
1596	Grose, Arlene	ID	4/6/21
1597	Gross, David	NJ	4/9/21
1598	Grossaint, Karen	CO	4/3/21
1599	Grossaint, Karen	CO	4/2/21
1600	Grote, Sikt	NH	4/5/21
1601	Grubola, Kay	KY	4/12/21
1602	Gruden, Mary Ann	TX	4/13/21
1603	Gruentzel, Paula	CO	4/5/21
1604	Grundy, Susan	OH	4/7/21
1605	Guarino, Gerardo	FL	4/8/21
1606	Guenther, Lavaune	WI	4/5/21

1607	Gueron, Eva	SD	4/4/21
1608	Gueron, Eva	SD	4/11/21
1609	Guest, Michael	IN	4/6/21
1610	Guldan, John	IL	4/6/21
1611	Gullen, Elizabeth	CT	4/5/21
1612	Gunderman, Judi	WI	4/10/21
1613	Gunderson, Bruce	NM	4/8/21
1614	Gunderson, Patti	FL	4/10/21
1615	Gunn, Bob	CA	4/2/21
1616	Gunn, Janet	CO	4/12/21
1617	Gunther, Traci	IL	4/10/21
1618	Gustaveson, Rob	OR	4/8/21
1619	Guthrie, Taza	AZ	4/11/21
1620	Gwinn, Brian	CA	4/7/21
1621	H, Helgaleena	WI	4/4/21
1622	H., Bett	NM	4/12/21
1623	H., C.	NM	4/3/21
1624	Haack, Myrthala	TX	4/7/21
1625	Haage, I	CA	4/12/21
1626	Haas, Maurie	TX	4/7/21
1627	Habermann, Susan	NC	4/13/21
1628	Hache, Marlene	WA	4/3/21
1629	Hache, Marlene	WA	4/13/21
1630	Hackworth, Jo	OR	4/2/21
1631	Haddow, Helen	CO	4/7/21
1632	Hadler, Dale	MN	4/14/21
1633	Hadsall, Patricia	CA	4/5/21
1634	Hagen, Carol	CA	4/4/21
1635	Hagerty, Melody	WA	4/3/21
1636	Hagofsky, Barbara	PA	4/6/21
1637	Hague, Edward	NY	4/5/21
1638	Haig, Maureen	WI	4/13/21
1639	Hainsey, Nancy	MI	4/4/21
1640	Halbritter, Kenny	SD	4/5/21
1641	Haldeman, Laura	NY	4/1/21
1642	Hale, Heather	GA	4/12/21
1643	Hales, Scott	CA	4/12/21
1644	Haley, Lauren	VA	4/11/21
1645	Hall, Bonnie	NJ	4/9/21

1646	Hall, Bonnie	WV	4/10/21
1647	Hall, Britt	MA	4/9/21
1648	Hall, Dirk	OR	4/9/21
1649	Hall, Linda	CA	4/6/21
1650	Hall, Matthew	KY	4/4/21
1651	Hall, Michael	FL	4/12/21
1652	Hall, Nancy	ME	4/9/21
1653	Halliday, Michael	OH	4/9/21
1654	Hallstead, Fredette	CT	4/3/21
1655	Hallstead, Richard	CT	4/3/21
1656	Hallwas, Sue	NY	4/2/21
1657	Haltom, D	MI	4/4/21
1658	Hamilton, .James	CA	4/6/21
1659	Hamilton, Becky	TN	4/9/21
1660	Hamilton, Juli	IN	4/8/21
1661	Hamilton, Teresa	PA	4/4/21
1662	Hamman, Sherry	OH	4/5/21
1663	Hammond, Fran	WA	4/5/21
1664	Hammond, Mark	NY	4/4/21
1665	Hamor, Nancy	VT	4/11/21
1666	Hampton, Patty	SC	4/2/21
1667	Hance, Lorna	OH	4/3/21
1668	Haney, Susan	NY	4/3/21
1669	Hankins, Jan	OH	4/14/21
1670	Hanley, Becky	FL	4/5/21
1671	Hannay, Kathryn	CA	4/5/21
1672	Hansen, Beth	MN	4/3/21
1673	Hansen, Julie	SD	4/3/21
1674	hansen, Ken	NE	4/3/21
1675	Hansen, Sandra	IL	4/7/21
1676	Hanson, Connie	ME	4/12/21
1677	HANSON, Don	IL	4/6/21
1678	Harbeson, Patrick	FL	4/3/21
1679	Harbeson, Ronald	DE	4/3/21
1680	Harcourt, Linda	IN	4/3/21
1681	Harding, Donna	WA	4/3/21
1682	Harding, Donna	WA	4/4/21
1683	Harlan, Jacqueline	AZ	4/11/21
1684	harmer, jill	KY	4/11/21

1685	Harmon, Patsy	OH	4/2/21
1686	Haro, Deb	NC	4/12/21
1687	Harold, Geoffrey	OR	4/6/21
1688	Harper, Adrienne	TX	4/10/21
1689	Harper, Alan	VA	4/13/21
1690	Harrell, SHERRI	DE	4/11/21
1691	Harrington, Michelle	ME	4/13/21
1692	Harris, Carol	MO	4/3/21
1693	Harris, Ethel	AZ	4/5/21
1694	Harris, Gary	OR	4/8/21
1695	Harris, Judy	WA	4/14/21
1696	Harris, Nancy	CT	4/3/21
1697	Harris, Philip	FL	4/8/21
1698	Harris, Susan	IN	4/3/21
1699	Harris, Susan	IN	4/8/21
1700	Harris, Tamara	IL	4/4/21
1701	Harris, Theresa	NY	4/6/21
1702	Harris, Tracy	WA	4/11/21
1703	Harrison, Paige	NY	4/9/21
1704	Harrison, Pat	AL	4/5/21
1705	Harry, Sherry	AZ	4/6/21
1706	Hart, Cynthia	MI	4/3/21
1707	Hart, Sandra	KY	4/7/21
1708	Harten, Amy	OH	4/4/21
1709	Harter, Thomas	PA	4/6/21
1710	Hartman, Michelle	WA	4/3/21
1711	hartmann, mary	NV	4/4/21
1712	Hartzler, Lisa	PA	4/7/21
1713	Harvey, Mark Judy	PA	4/13/21
1714	Harvey, Stephanie	CA	4/4/21
1715	Hathaway, Melissa	OR	4/4/21
1716	Hattaway, Stanley	AZ	4/13/21
1717	Hauck, Melba	MI	4/3/21
1718	Haun, Pamela	FL	4/4/21
1719	Hawkins, Meredith	AR	4/10/21
1720	Hay, Katharine	WA	4/5/21
1721	Haydamacha, Tina	NJ	4/13/21
1722	Hayes, Deborah	MT	4/8/21
1723	Hayes, Jordan	SC	4/2/21

1724	Hayes, Laura	FL	4/6/21
1725	Hayes, Nancy	NY	4/4/21
1726	Haynes, Mark	MI	4/6/21
1727	Hazlett, Kay	OH	4/3/21
1728	Healey, Gerilyn	NM	4/4/21
1729	Heard, jeanette	UT	4/7/21
1730	Hearn, Rick	VT	4/2/21
1731	Heath, Patricia	MI	4/6/21
1732	Heaton, Laurie	IL	4/5/21
1733	Heckler, Twila	PA	4/13/21
1734	Heels, Tom	ME	4/12/21
1735	Heerkens, Deborah	NY	4/4/21
1736	Hegarty, Rosemary	CO	4/5/21
1737	heichelbech, lisa	MI	4/8/21
1738	Heiler, Sandra	CA	4/8/21
1739	Heiner, Julie	MI	4/12/21
1740	Heinrich, Ann Marie	VA	4/8/21
1741	Henderson, Cathy	MO	4/5/21
1742	Hendzel, Charles	PA	4/8/21
1743	Henke, Philip	CO	4/9/21
1744	Henkle, Nancy	OR	4/3/21
1745	Henley, Jennifer	NC	4/3/21
1746	Henry, Andrew	CT	4/10/21
1747	Henry, Barbara	FL	4/8/21
1748	Henry, Grayson	PA	4/3/21
1749	Henry, Louise	FL	4/3/21
1750	Henschke, Diane	WI	4/14/21
1751	hensel, paula	FL	4/10/21
1752	Hensman, Robert	FL	4/5/21
1753	Hensman, Robert	FL	4/7/21
1754	Henson, Janice	OK	4/3/21
1755	Herbers, Jill	NH	4/5/21
1756	Hermann, Esther	MO	4/3/21
1757	herrera, daniel	CA	4/3/21
1758	Herrera, Mario	CO	4/8/21
1759	Herron, John	NC	4/6/21
1760	Hersey, Lorraine	OR	4/5/21
1761	Hersh, Robin	NE	4/6/21
1762	Hersum, Marian	TX	4/7/21

1763	Hersum, Terry	TX	4/7/21
1764	Herten, Elizabeth	OH	4/7/21
1765	Hescox, Cecilia	TX	4/3/21
1766	Hetcher, Aaron	NY	4/10/21
1767	Heuser, Marilyn	WA	4/11/21
1768	Hewes, Lisa	ID	4/4/21
1769	Hewitt, Jo	IN	4/3/21
1770	Hexamer, Maury	CA	4/7/21
1771	Heywood, Susan	WA	4/2/21
1772	Hiatt, cynthia	CO	4/7/21
1773	Hibbert, Karolee	NY	4/4/21
1774	Hickle, Steve	NC	4/5/21
1775	Hicks, Cynthia	AZ	4/2/21
1776	Hicks, Jerry	FL	4/3/21
1777	Higgins, Judith	DE	4/5/21
1778	Hildreth, Jana	WA	4/1/21
1779	Hileman, Judith	NJ	4/9/21
1780	Hileman, Judy	KS	4/7/21
1781	Hill, Jessica	MT	4/9/21
1782	Hill, Kathryn	TN	4/9/21
1783	Hill, Robin	NJ	4/13/21
1784	Hillebrecht, Patsy	PA	4/4/21
1785	Hiller, Debbie	SC	4/7/21
1786	hilt, kathy	OH	4/2/21
1787	Hittl, Heidi	PA	4/13/21
1788	Himlan, Pauline	MA	4/4/21
1789	Hinckley, Clair	AZ	4/3/21
1790	Hines, Bunny	AL	4/4/21
1791	Hines, Joris	FL	4/6/21
1792	Hinman, Bill	WA	4/4/21
1793	Hinson, Becky	SC	4/11/21
1794	Hirai, Barbara	NH	4/2/21
1795	Hirschfeld, Karen	CA	4/4/21
1796	Hirsh, Andrew	CA	4/9/21
1797	Ho, Lisa	AZ	4/8/21
1798	Hoadley, Carol	FL	4/3/21
1799	Hoag, Susan	CA	4/8/21
1800	Hobbs, Linda	OK	4/3/21
1801	Hoeflinger, Julie	OH	4/1/21

1802	Hoene, Jean	ID	4/3/21
1803	Hofer, Richard	TX	4/6/21
1804	hoffman, Joshua	OH	4/8/21
1805	Hoffman, Lisa	FL	4/8/21
1806	hoffman, wayne	FL	4/13/21
1807	Hoffmaster, Debra	MI	4/9/21
1808	Hogner, Lucinda	AZ	4/10/21
1809	Hogue, Marie	TX	4/4/21
1810	Hogue, Susie	OH	4/10/21
1811	Hogue, Valerie	VA	4/10/21
1812	Hoke, Steve	FL	4/4/21
1813	Holcomb, Sherry	WI	4/13/21
1814	Holenko, Alex	NC	4/3/21
1815	Holger, Mason	MN	4/3/21
1816	Holland, Andrew	VA	3/31/21
1817	Holland, Andrew	VA	3/31/21
1818	Holland, Kate	CO	4/4/21
1819	Holland, Leslie	NC	4/11/21
1820	Holle, Andrea	CT	4/5/21
1821	Holley, Tanya	AK	4/5/21
1822	Holliday, Dawn	MT	4/5/21
1823	Hollinger, Sallie	CA	4/6/21
1824	Hollingsworth, Jay	WA	4/5/21
1825	Hollis, James	TX	4/11/21
1826	Hollman, Kenneth	MA	4/12/21
1827	Hollub, Judyth	IL	4/3/21
1828	Holman, Diana	CO	4/3/21
1829	Holman, Kathleen	OH	4/9/21
1830	Holmes, Carol	WV	4/4/21
1831	Holmes, Dianne	FL	4/2/21
1832	Holmes, Grace	TX	4/10/21
1833	Holmes, John	IL	4/9/21
1834	Holmes, Shauna	UT	4/13/21
1835	Holt, Debi	NY	4/14/21
1836	Holt, Lois	NC	4/10/21
1837	Holy, Kathryn	FL	4/2/21
1838	Holzer, James	MO	4/5/21
1839	Holzman, Tammy	IN	4/12/21
1840	Homa, Neal	TN	4/5/21

1841	Homyak, Nick	NJ	4/4/21
1842	Hono, Patrick	NY	4/5/21
1843	Honold, Wendy	WI	4/2/21
1844	Hoover, Viki	IL	4/6/21
1845	Hopkins, Charley	MN	4/6/21
1846	Horchar, Janette	AZ	4/4/21
1847	Hormel, Frances	MN	4/4/21
1848	Hornaday, Daniel	MI	4/2/21
1849	Horowitz, Meli	AZ	4/4/21
1850	Horsch, Thomas	VA	4/5/21
1851	Horst, Karla	CO	4/4/21
1852	Hotaling, Robert	NY	4/10/21
1853	Hotlen, Karen	WI	4/3/21
1854	Houberg-Lawton, Kwintone	UT	4/7/21
1855	Houck, Debra	VA	4/9/21
1856	Hough, Dennis	NY	4/7/21
1857	Hough, Dennis	NY	4/5/21
1858	House, Michael	AZ	4/9/21
1859	Houser, Elaine	PA	4/14/21
1860	Houser, Ronald	FL	4/5/21
1861	Houston, Nancy	TN	4/7/21
1862	Hovatter, Darlene	WA	4/3/21
1863	Howard, Julie	TX	4/7/21
1864	Howard, Lucy	MD	4/4/21
1865	Howard, Lynda	KY	4/10/21
1866	HOWLETT, Janis	NE	4/7/21
1867	Howlett, Phyllis	OR	4/5/21
1868	Howze, Damon	TX	4/8/21
1869	Howze, Damon	TX	4/11/21
1870	Huaman-Castillo, Donna	TX	4/5/21
1871	Huang, Juliet	IL	4/3/21
1872	Huang, Juliet	IL	4/7/21
1873	Hubbard, Jennifer	CO	3/31/21
1874	Huber, Leslie	FL	4/6/21
1875	Huelsberg, Carole	WA	4/3/21
1876	Huffman, Melodie	IL	4/7/21
1877	Hufford, Bill	PA	4/4/21
1878	Hufford, Cynthia	IN	4/4/21
1879	Hughes, Bonnie	AZ	4/2/21

1880	Hughes, George	PA	4/9/21
1881	Hughes, Hugo and Nan	WA	4/3/21
1882	hughes, patricia	CA	4/8/21
1883	Hughes, Theresa	MD	4/7/21
1884	Hughes, Tim	FL	4/10/21
1885	Hulsey, Ann	AL	4/3/21
1886	Humphrey, Paul	MS	4/3/21
1887	Hunt, Alexandra	ID	4/5/21
1888	Hunt, Jo	OH	4/13/21
1889	Hunt, Judith	CT	4/3/21
1890	Hunt, Kerry	CT	4/8/21
1891	Hunter, Darlene	TX	4/4/21
1892	Hunter, Konrad	CA	4/5/21
1893	Hunter, Leslie	NY	4/13/21
1894	Hunter, Shannon	OR	4/12/21
1895	Hurlbut, Elizabeth	IN	4/5/21
1896	Hurne, Sharon	SC	4/2/21
1897	Hurst, Toni	OK	4/4/21
1898	Husaini, Minha	HI	4/1/21
1899	Husby, John	MI	4/5/21
1900	Hutcherson, Niwona	OK	4/10/21
1901	Hutchison, Erin	WA	4/11/21
1902	Hutchison, Leland	WI	4/7/21
1903	Hyle, Cheryl	IL	4/7/21
1904	Hynes, Anthony	FL	4/14/21
1905	Hynes, Kathleen	CA	4/3/21
1906	Hynes, Nancy	TX	4/10/21
1907	Ianchiou, Peter	AZ	4/6/21
1908	Ilich, Sharon	VA	4/11/21
1909	Insley, William	WA	4/4/21
1910	Ireland, Victoria	MD	4/11/21
1911	Irvin, Michelle	IN	4/4/21
1912	Irvin, Robert	MN	4/12/21
1913	Irvine, Don	AL	4/3/21
1914	Irwin, Jo	NJ	4/3/21
1915	Isbell, Sharon	OH	4/3/21
1916	Israel, P Denise	IL	4/3/21
1917	Itano, Steve	WA	4/10/21
1918	ito, cassie	IL	4/6/21

1919	Ivens, Rosalind	ME	4/9/21
1920	J warcup, Jon	FL	4/4/21
1921	Jabens, Sharon	NE	4/11/21
1922	Jack, Lance	IL	4/11/21
1923	Jackson, Lisa	CO	4/3/21
1924	Jackson, Lori	KY	4/12/21
1925	Jackson, Patricia	UT	4/3/21
1926	Jackson, Sandra	NM	4/4/21
1927	Jackson, Shawn	AZ	4/7/21
1928	Jackson, Zackary	UT	4/10/21
1929	Jacobs, Emily	ME	4/9/21
1930	Jacobs, June	TN	4/6/21
1931	Jacobs, Marthanna	KS	4/3/21
1932	Jacoby, Susan	OH	4/6/21
1933	Jacques, Sally Jacques	TX	4/4/21
1934	Jagasia, Renu	CA	4/13/21
1935	Jagasia, Renu	CA	4/6/21
1936	Jaissle, Kathleen	MI	4/13/21
1937	Jakab, Jean	IN	4/6/21
1938	Jakubik, Rose	IL	4/4/21
1939	James, Alison	CT	4/5/21
1940	James, Kathleen	MO	4/6/21
1941	James, Kenneth	SC	4/11/21
1942	James, Megan	VA	4/13/21
1943	James, Tim	AR	4/3/21
1944	Janes-Allen, Ruth	WA	4/4/21
1945	Janes, Mary	WI	4/4/21
1946	Janfrancisco, Kathy	AZ	4/3/21
1947	Janik, Nina	NM	4/3/21
1948	Janter, Thomas	GA	4/5/21
1949	Jantzen, Carell	CA	4/4/21
1950	Jarvis, Kimberly	FL	4/10/21
1951	Jarvis, Pam	IA	4/6/21
1952	Javier, Lee	FL	4/6/21
1953	Jaynes, Vicki	MO	4/2/21
1954	Jean, Connie Jean	CA	4/2/21
1955	Jenifer, Irwin	CA	4/11/21
1956	Jenkins, Diann	OH	4/4/21
1957	Jenkins, Gerald	NY	4/9/21

1958	Jenkins, Roy	CO	4/6/21
1959	Jenne, Jeffrey see	PA	4/10/21
1960	Jennings, Florence	MA	4/6/21
1961	JENNINGS, JUDITH	IA	4/3/21
1962	Jensen, Rose	VA	4/3/21
1963	Jensen, Yvonne	CA	4/5/21
1964	Jessen, Angela	CO	3/31/21
1965	Jilton Rogers, Sandra	OR	4/3/21
1966	Jim, Zampathas	HI	4/3/21
1967	Jo, Luana	OR	4/6/21
1968	Johan, Michael	CO	4/3/21
1969	Johnson, Alan	MI	4/3/21
1970	Johnson, Barbara	CO	3/30/21
1971	Johnson, Claire	TX	4/12/21
1972	Johnson, D	NY	4/8/21
1973	Johnson, Dean	TX	4/2/21
1974	Johnson, Desiree	MA	4/8/21
1975	Johnson, Erin	PA	4/7/21
1976	Johnson, Hollyce	WI	4/8/21
1977	Johnson, Judy	PA	4/8/21
1978	Johnson, Kathleen	FL	4/11/21
1979	johnson, Kimberly	WA	4/8/21
1980	Johnson, Larry	CA	4/2/21
1981	Johnson, Linda	CA	4/10/21
1982	Johnson, Paul	NY	4/14/21
1983	Johnson, Paulette	WI	4/7/21
1984	Johnson, Tamara	WI	4/8/21
1985	Johnston, Chuck	WI	4/6/21
1986	Johnston, Donna	FL	4/5/21
1987	Johnston, Sue	AZ	4/3/21
1988	jollimore, Penny	MA	4/3/21
1989	Jones Peterson, Joan	MN	4/13/21
1990	Jones, Andrew	PA	4/5/21
1991	Jones, Billie	FL	4/3/21
1992	Jones, Carol	KS	4/5/21
1993	Jones, Emilie	IL	4/3/21
1994	Jones, Hilda	NC	4/3/21
1995	Jones, J	VA	4/6/21
1996	Jones, Kathrine	NY	4/12/21

1997	Jones, Mitzi	TX	4/9/21
1998	Jones, Pamela	TX	4/12/21
1999	Jones, Pat	NC	4/3/21
2000	Jones, robert	KS	4/4/21
2001	Jordan, Sarah	VA	4/6/21
2002	Jorgensen, Joanne	WA	4/4/21
2003	Joseph, Judy	PA	4/7/21
2004	Jouett, Marceau	IL	4/2/21
2005	Joy Moreland, Pamela	FL	4/9/21
2006	Jugan, Matt	NJ	3/31/21
2007	Juozapaitis, Rachel	FL	4/9/21
2008	Jusek, Lauren	PA	4/10/21
2009	K., V.	IL	4/7/21
2010	Kadlec, Kenneth	DE	4/9/21
2011	Kahn, Cyril	PA	4/5/21
2012	Kalemis, Brenda	MO	4/3/21
2013	Kaleta, Charles	WA	4/6/21
2014	Kaleta, Deborah	WA	4/6/21
2015	Kalkstein-Lamb, Deborah	VT	4/10/21
2016	Kalman, Marcia	MA	4/11/21
2017	Kane, Sara	NC	4/2/21
2018	Kang, Michelle	NY	4/1/21
2019	Kaniel, Abbigail	CA	4/4/21
2020	Kaohelaulii, Annette	HI	4/5/21
2021	Kaplan, Debra	FL	4/7/21
2022	Kappes, Deborah	IN	4/5/21
2023	Kapustka, Franklin	OR	4/3/21
2024	Karkut, Cathy	MO	4/5/21
2025	Karns, Jeri	IN	4/13/21
2026	Karp, Cyndi	OR	4/4/21
2027	Karpinski, Kathleen	OH	4/4/21
2028	Karre, Vanessa	CO	4/3/21
2029	Karvounis, Marina	IA	4/5/21
2030	Karwowski, Paula	CT	4/13/21
2031	kaszynski, mike	IL	4/3/21
2032	Kates, Marcel	FL	4/3/21
2033	Kathmann, Gus	MN	4/2/21
2034	Katzenmeyer, Rebecca	OH	4/9/21
2035	Kauaihilo, Pegi	CA	4/3/21

2036	Kauffman, Jason	IN	4/7/21
2037	Kaufman, Michelle	VT	4/13/21
2038	Kavanaugh Jr, Michael	VA	4/5/21
2039	Keech, David	MA	4/5/21
2040	Keegan, Constance	KY	4/3/21
2041	Keegan, Elizabeth	IN	4/2/21
2042	Keeler, Dorothy	MT	4/3/21
2043	Keelin, Jody	MN	4/6/21
2044	Keenan, JoAnn	WA	4/4/21
2045	Keene, Patricia	ME	4/9/21
2046	Keene, Sandra	NM	4/8/21
2047	Kegebein, Dan	WA	4/12/21
2048	Keinz, Carol	IL	4/3/21
2049	Keiter, Carol	KY	4/7/21
2050	Keliher, Michael	NJ	4/3/21
2051	Kellenbeck, Bill	NH	4/6/21
2052	kelley, daryl	ME	4/2/21
2053	Kelley, Deborah	MA	4/7/21
2054	Kelley, Denise	TX	4/5/21
2055	Kelley, Margaret	AZ	4/3/21
2056	Kelly, Barbara	SC	4/13/21
2057	Kelly, Margaret	OR	4/4/21
2058	Kelly, Maureen	OR	4/7/21
2059	Kelly, Tom	CA	4/11/21
2060	Kemmerer, Carol	AZ	4/6/21
2061	Kemmerer, David	AZ	4/6/21
2062	Kendall, Benjamin	AZ	4/10/21
2063	Kendall, Robin	IL	4/13/21
2064	Kendall, Suzanne	OR	4/3/21
2065	Kennedy, Jeff	NC	4/3/21
2066	Kennedy, Julia	NC	4/6/21
2067	Kennedy, Mary	MO	4/12/21
2068	Kepcha, Andrea	KY	4/10/21
2069	Kepcha, Andrea	KY	4/10/21
2070	Kerbel, Susan	WI	4/13/21
2071	Kerfoot, Tim	WA	4/9/21
2072	Kerig, Susan	NC	4/14/21
2073	kerins, James	MD	4/3/21
2074	Kerker, Mary	CO	4/13/21

2075	Kerns, Michael-David	WV	4/9/21
2076	Kerr, Elizabeth	VA	4/7/21
2077	Kester, Ed	ND	4/8/21
2078	Keuthan, Aliyah	IN	4/10/21
2079	Key, Julie	IN	4/9/21
2080	Keyes, Diana	CA	4/5/21
2081	Keyes, Melissa	IA	4/4/21
2082	Keyser, Timothy	OH	4/6/21
2083	Khan, Sandy	CA	4/3/21
2084	Kherson, Milla	IL	4/12/21
2085	Khumprakob, Elizabeth	OH	4/12/21
2086	Kibbe, Loretta	FL	4/4/21
2087	Kilpatrick, Daun	FL	4/12/21
2088	Kimball, Judith	CA	4/4/21
2089	Kimball, Susan	AZ	4/3/21
2090	Kimpston, Charles	IA	4/13/21
2091	Kinahan, Janet	MA	4/11/21
2092	Kinder, Stephen	MO	4/8/21
2093	King, Ann	MT	4/11/21
2094	King, Arline	WA	4/3/21
2095	King, Deborah	GA	4/6/21
2096	King, Helen	IL	4/8/21
2097	King, Kari	NY	4/4/21
2098	King, Luanne	NH	4/14/21
2099	king, marlene	WA	4/9/21
2100	King, Martha	FL	4/14/21
2101	King, Regina	NC	4/7/21
2102	Kingery, David	UT	4/5/21
2103	Kingsbury, John	CA	4/5/21
2104	kinzie, bill	VT	4/5/21
2105	kipilman, jeff	OR	4/8/21
2106	Kirby, Owen	MT	4/10/21
2107	Kirchhofer, Dale	MO	4/2/21
2108	Kirchhofer, Dale	MO	4/6/21
2109	Kirchhoff, Marilyn	NE	4/4/21
2110	Kirchner, John	IN	4/3/21
2111	Kirk, Jenny	PA	4/5/21
2112	Kirkey, Lisa	MI	4/3/21
2113	Kirshbaum, David	AZ	4/4/21

2114	Kirtley, Stacie	CO	4/5/21
2115	Kivioja, Elle	WI	4/7/21
2116	Klaahsen, Michelle	IA	4/6/21
2117	Klava, Joyce	TX	4/2/21
2118	Kleinhen, Lori	IN	4/3/21
2119	Klos, Myron	MI	4/12/21
2120	Klueger, Sandra	WI	4/3/21
2121	Kluhsman, Holly	WI	4/13/21
2122	Klump, Phil	CO	4/11/21
2123	Knab, Kathryn	WI	4/12/21
2124	Knable, Flora	IN	4/4/21
2125	Kneaskern, Sandra	NC	4/5/21
2126	Knies, Naomi	NJ	4/9/21
2127	Knight, Sandra	PA	4/4/21
2128	Knitter, Annette	IL	4/7/21
2129	know, don't	KS	4/9/21
2130	Knuth, Mark	CA	4/14/21
2131	Koch, Judith A.	OH	4/6/21
2132	Koerper, Carole	OH	4/2/21
2133	Koff, Marilyn	NV	4/3/21
2134	Kofler, Roger	OR	4/5/21
2135	Kohn, Lawrence	FL	4/9/21
2136	Kokesch-Valdez, Tara	MN	4/9/21
2137	kolaski, diana	IL	4/12/21
2138	Kolb, Emily	IN	4/2/21
2139	KOLB, MJ	OR	4/2/21
2140	Kolemainen, Gabriele	IL	4/7/21
2141	Koone, Nancy	NC	4/3/21
2142	Koop, Kandyce	AZ	4/2/21
2143	Kopperud, Linda	CA	4/3/21
2144	Korbova, Bibiana	NY	4/14/21
2145	Korhonen, Gloria	MI	4/13/21
2146	Kornstein, Nina	MA	4/11/21
2147	Koroleski, William	NY	4/6/21
2148	Kosbab, Rebecca	MN	4/5/21
2149	Kosmicki, Karen	KS	4/3/21
2150	Kostick, Marcia	MA	4/4/21
2151	Kostiuk, Terry	NC	4/4/21
2152	Kotch, Brant	TX	4/6/21

2153	Kouris, Patricia	MT	4/3/21
2154	koussan, lucille	MI	4/8/21
2155	Kovac, Charles	KS	4/3/21
2156	Kovalcheck, Billie	PA	4/3/21
2157	Kowalczyk, Catherine	ME	4/7/21
2158	Kowalewski, Penny	IL	4/11/21
2159	Kowalewski, Penny	IL	4/4/21
2160	Kozlowski, Marion	FL	4/8/21
2161	Kramer, Carole	CA	4/3/21
2162	kramer, patricia	AZ	4/11/21
2163	Kranda, Karen	NC	4/3/21
2164	Kranker, Kim	TX	4/12/21
2165	Kratzer, Deborah	NJ	4/5/21
2166	krause, connie	WI	4/6/21
2167	Krause, Donald	TX	4/6/21
2168	Krause, Georgannr	MN	4/13/21
2169	Krause, Glenda	AZ	4/4/21
2170	Kreiner, Dennis	IL	4/3/21
2171	Krell, Elinore	MD	4/8/21
2172	Krist, Deborah	OH	4/11/21
2173	Krob, Linda	CT	4/6/21
2174	Krodel, Kim	CT	4/9/21
2175	Kromkowski, Frank	MT	4/10/21
2176	Kromminga, Geri	WA	4/2/21
2177	Krstevski, Sheila	NY	4/4/21
2178	Krug, Ilana	MD	4/10/21
2179	Kruger, Pam	KS	4/9/21
2180	Kruser, Lee	OH	4/12/21
2181	Kubacki, Katherine	WI	4/4/21
2182	Kuhlman, Ann	MI	4/3/21
2183	Kuhlman, Karen	LA	4/4/21
2184	Kujawa, Kevin	MN	4/14/21
2185	kulesza, hank	WI	4/11/21
2186	Kull, Barb	MN	4/6/21
2187	Kung, Faith	CA	4/3/21
2188	Kuns, Margaret	OH	4/11/21
2189	Kuntz, Jon	CO	4/9/21
2190	KURACH, SHARON	CO	4/9/21
2191	Kurahara, Michelle	NJ	4/3/21

2192	Kurtz, Trish	VA	3/31/21
2193	Kuser, Eleanor	CA	4/13/21
2194	Kushner, Randee	MI	4/6/21
2195	Kuykendall, Russell	ID	3/31/21
2196	Kwasneski, Cathie	WI	4/3/21
2197	Kwasnik, Barbara	NJ	4/11/21
2198	L, C	VA	4/11/21
2199	La, Z	CA	4/7/21
2200	Labb, Deborah	IL	4/9/21
2201	Labb-Babin, Lilianne and George	ME	4/8/21
2202	LaBrecque, Cathie	CA	4/3/21
2203	Labrecque, Sandra	CT	4/10/21
2204	LaBrecque, Sharon	FL	4/6/21
2205	Lacinak, Juluie	LA	4/12/21
2206	Lade, C. M.	IL	4/3/21
2207	Lade, C. M.	IL	4/7/21
2208	Laderbush, Christine	TX	4/14/21
2209	Laffey, James W	VA	4/14/21
2210	Laforce, JOSEPH	NY	4/8/21
2211	LaFour, Liz	TX	4/8/21
2212	lakebrink, joan	IL	4/6/21
2213	LaLime, Richard	FL	4/4/21
2214	Lamagno, Patricia	IL	4/14/21
2215	Lamb, Henry	TX	4/4/21
2216	Lambeau, Catherine	WV	4/9/21
2217	Lambert, Dianne	KS	4/6/21
2218	Lambert, Jenica	IL	4/4/21
2219	Lambert, Rebecca	FL	4/12/21
2220	Lambru, Angela	NY	4/11/21
2221	Lamere, Ronald	MI	4/7/21
2222	Lampi, Laurel	IL	4/3/21
2223	Lampman, Marilee	MN	4/12/21
2224	Landauer, Teri	OR	4/12/21
2225	Landers, Michael	MA	4/8/21
2226	Landry, Amy	FL	4/4/21
2227	Landskron, David	FL	4/4/21
2228	Lane Jr, Leslie M	NC	4/13/21
2229	Lane, Teckla	IN	4/9/21

2230	Lang, Michelle	MN	4/11/21
2231	Langdon, Wendy	IN	4/14/21
2232	Langford Edwards, Kathryn	AZ	4/3/21
2233	Lanier, Nancy	TX	4/4/21
2234	Lanman, Elizabeth	OH	4/3/21
2235	Lanni, Janet	SC	4/10/21
2236	laplante, steve	OH	4/11/21
2237	Lappo, Robert	CA	4/3/21
2238	LaPrade, Rebecca	NC	4/4/21
2239	Larison, John	GA	4/8/21
2240	LaRochelle, John	MA	4/3/21
2241	Larsen, Debra	UT	4/12/21
2242	Larsen, Diane	NY	4/7/21
2243	Larsen, John	MI	4/13/21
2244	Larson, Beth	AZ	4/12/21
2245	Larson, C. A.	MN	4/8/21
2246	Larson, LuAnne	SD	4/11/21
2247	Larson, Nathan	AR	4/14/21
2248	Larue, Lisa	FL	4/3/21
2249	Lasater, Nancy	MI	4/4/21
2250	Lasciak, Valerie	HI	4/6/21
2251	Lathrop, Cal	CO	4/3/21
2252	Lattanzi, Gene	MA	4/12/21
2253	Lattanzio, Denise	NJ	4/14/21
2254	Lattin, Stan	WA	4/2/21
2255	Laughlin, Mary	FL	4/3/21
2256	Laughlin, Rhonda	IN	4/7/21
2257	Laurie, Annie	MA	4/2/21
2258	Lauzon, Charlene	WA	4/13/21
2259	Lavoie, Kyrstin	CO	4/1/21
2260	Law, Tina	NY	4/4/21
2261	Lawlor, Janet	MA	4/5/21
2262	Lawlor, Lynne	CO	4/5/21
2263	Lazarus, Eva	OR	4/3/21
2264	Le Mieux, Daniel	WI	4/9/21
2265	Leaird, Yolanda	CA	4/6/21
2266	Leaper, Sandra	FL	4/11/21
2267	Learch, Lynn	TN	4/11/21
2268	Learnihan, Thomas	NV	4/10/21

2269	Leas, Arlene	IN	4/3/21
2270	Leatherman, Joseph	WA	4/5/21
2271	LeBlanc, Paul	NY	4/3/21
2272	LeBlanc, Virginia	FL	4/5/21
2273	Lecomte, Johanne	VA	4/1/21
2274	Lee-Moore, Kaye	AR	4/6/21
2275	Lee, Cynthia	MO	4/10/21
2276	Lee, Daniel	WA	4/2/21
2277	Lee, Jayne	FL	4/4/21
2278	Lee, Jo	CO	4/8/21
2279	Lee, Jon	NY	4/7/21
2280	Lee, Kathleen	WA	4/3/21
2281	Lee, Richard	FL	4/3/21
2282	Lee, Stacy	MD	4/7/21
2283	Leflore, Elisa	OK	4/14/21
2284	Lehman, M David	OH	4/4/21
2285	Lehman, Terry	FL	4/6/21
2286	Lehmkuhler, Kathy	NC	4/3/21
2287	Leigh, Marca	NY	4/10/21
2288	Leigh, Susan Parker	TX	4/3/21
2289	Lein, Doris	IL	4/10/21
2290	Lemagie, Karen	WA	4/5/21
2291	LeMieux, Dan Lemieux	WI	4/6/21
2292	Lemmond, Byron	TX	4/2/21
2293	Lemus, Mary	CA	4/3/21
2294	Lencina, Chandra	NY	4/7/21
2295	Lenshoek, P	NJ	4/4/21
2296	Leonard, Sara	ME	4/7/21
2297	Lerberg, Jo	MN	4/3/21
2298	Leslie, Jane	MN	4/2/21
2299	Leslie, Leslie	PA	4/4/21
2300	Lespier, Evelyn	FL	4/5/21
2301	Lessig, Barbara	NJ	4/7/21
2302	leu, Marie	WA	4/10/21
2303	Leverton, Joy	KS	4/6/21
2304	Levin, Rose	MN	4/8/21
2305	Levin, Vivian	KY	4/3/21
2306	Levine, Karina	AZ	4/7/21
2307	LEVITCH, PAULLA	KS	4/10/21

2308	Levitt, Jeffrey	NY	4/3/21
2309	Levkoff, Janis	VA	4/11/21
2310	Levkovitz, Thea	WA	4/13/21
2311	Levy, R	IL	4/10/21
2312	Lewis, Carol	WV	4/2/21
2313	Lewis, Doris J.	TN	4/3/21
2314	Lewis, Gerry	WA	4/14/21
2315	Lewis, Kaye	PA	4/6/21
2316	Lewis, Sarah	IN	4/8/21
2317	Ley, Cid	MI	4/12/21
2318	Libby, Dominic	NH	4/9/21
2319	Liberty, James	ME	4/5/21
2320	Liberty, Sandra	NH	4/12/21
2321	libman, Diane	IL	4/3/21
2322	Light, Julie	MN	4/13/21
2323	Lightoller, Ioan	WA	4/13/21
2324	Lily, Deb	MN	4/10/21
2325	Linarelli, Rani	WA	4/7/21
2326	Lincoln, Kely	MI	4/13/21
2327	Lindbergh, Renee	CA	4/3/21
2328	Lindblad, Joyce	KS	4/4/21
2329	Lindhart, Bob	MN	4/3/21
2330	Lindorff, Elizabeth	CT	4/2/21
2331	Lindqvist, Annika	TX	4/6/21
2332	Lindsley, Sharon	NY	4/5/21
2333	Lindstrom, Susan	IL	4/14/21
2334	Linerud, Tim	CA	4/6/21
2335	Link, Sherry	ID	4/7/21
2336	Linsenmaier, Katja	PA	4/12/21
2337	Linton, Cynthia	IL	4/13/21
2338	Linville, Deborah	OR	4/9/21
2339	Liszak, Jerry	WA	4/11/21
2340	Litkofsky, Ira	NY	4/6/21
2341	Little, Godfrey	FL	4/8/21
2342	Little, Pam	MT	4/3/21
2343	Livingood, Karen	OH	4/12/21
2344	Livingston, Hadley	IN	4/8/21
2345	Livingstone Montana, Susan	CA	4/3/21
2346	Lloyd, Bruce	WA	4/5/21

2347	Lloyd, Robin	MI	4/6/21
2348	Lockhart, Paula	AK	4/12/21
2349	Lockman, David	WA	4/6/21
2350	Lockridge, Dale	OR	4/13/21
2351	Lodyga, Louis	FL	4/10/21
2352	Loftin, Nancy	OH	4/3/21
2353	Logan, Ruth	PA	4/7/21
2354	Logan, Gregory	TX	4/12/21
2355	Logan, Will	ID	4/1/21
2356	Lombardi, Maryellen	VA	4/3/21
2357	Lombardo, Judith	NY	4/3/21
2358	Long, Beverly	MO	4/10/21
2359	Long, Karol	WA	4/4/21
2360	Long, Sean	IL	4/13/21
2361	Longenhagen, Deb	PA	4/6/21
2362	Loomis, William	OH	4/14/21
2363	Looney, Deborah	VA	4/14/21
2364	Lopez, Irma	CA	4/3/21
2365	Lopez, Yaneth	AZ	4/1/21
2366	Lopez, Yaneth	AZ	4/1/21
2367	Lord, Sharon	NC	4/13/21
2368	Lorentson, Nancy	VA	4/5/21
2369	Lori, Mead	WY	4/13/21
2370	Loring, Laura	MT	4/3/21
2371	Loscalzo, Susan	NC	4/4/21
2372	Lose, Donna	FL	4/3/21
2373	Losie, David	WA	4/5/21
2374	Louchard, O'Neill	CA	4/5/21
2375	Loughlin, Kathleen	NY	4/7/21
2376	Love, James	AZ	4/13/21
2377	Lovelace, Chris	NC	4/9/21
2378	Loveless, Todd	MD	4/3/21
2379	Lowe, Patricia	PA	4/13/21
2380	Lowery, Patricia	TN	4/11/21
2381	Lowry, Lindsay	NJ	4/3/21
2382	Loyd, Tracey	WA	4/3/21
2383	Lubin, Cindy	NY	4/1/21
2384	Lucaciu, Lidia	NC	4/3/21
2385	Luchesi, Gail	OR	4/9/21

2386	Luft, Bonnie	MI	4/9/21
2387	LUHRING, CARL	CA	4/6/21
2388	Lujan, Mitra	NM	4/2/21
2389	Luke, Donald	NY	4/10/21
2390	Lukens, Mark	PA	4/11/21
2391	Lukes, Zachary	MT	4/5/21
2392	Lulis, Evelyn	IL	4/4/21
2393	Lummanick, Susan	CO	4/11/21
2394	Luna, Judi	NM	4/8/21
2395	Lund, Christine	TX	4/10/21
2396	Lund, Kristen	RI	4/12/21
2397	Lundergan, Gerri	FL	4/10/21
2398	Lundstrom, Cheri	IN	4/6/21
2399	Lunsford, Jimmie	CA	4/9/21
2400	Lutton, Patricia	CO	3/31/21
2401	Lydecker, Joy	FL	4/13/21
2402	Lyle, David	TX	4/3/21
2403	Lyles, Diana	FL	4/7/21
2404	Lynch, Anthony	TX	4/3/21
2405	Lynch, John	PA	4/7/21
2406	Lynch, Sheila	DE	4/3/21
2407	Lynn, Beverly	TX	4/14/21
2408	Lynn, Sheree	CO	4/7/21
2409	Lyon, Terry	VA	4/5/21
2410	M, M	FL	4/6/21
2411	Mac, S.	GA	4/8/21
2412	Macaitis, Terri	NE	4/5/21
2413	Macintosh, Arlene	FL	4/5/21
2414	Mackie, Deborah	MA	4/3/21
2415	MacMillan, Kevin	NH	4/6/21
2416	MacStay, A. Alia	NC	4/4/21
2417	Macy, Chris	CA	4/12/21
2418	Madden, Patra	TX	4/3/21
2419	Mae, Holly	OR	4/7/21
2420	Maestas, Melanie	NM	4/8/21
2421	Magee, Tim	WI	4/5/21
2422	Magis, Mary	IL	4/7/21
2423	Maguire, Joel	MA	4/8/21
2424	Maguire, Karen	MA	4/4/21

2425	Mahaffey, Jann	IL	4/5/21
2426	Maher, Peggy	TN	4/8/21
2427	maher, susan	VT	4/5/21
2428	Mahler, Roger	VA	4/3/21
2429	Mahony, Debra	CT	4/8/21
2430	Mahood, Scott	OR	4/6/21
2431	Mahuron, Ellen	IN	4/3/21
2432	Main, Valerie	NM	4/11/21
2433	Maini, PJ	NY	4/5/21
2434	majors, patricia	MI	4/5/21
2435	Majors, Paul	IL	4/5/21
2436	Maler, Sandra	DC	4/6/21
2437	Malin, Patricia	AZ	4/14/21
2438	Mallory, Regina	MO	4/5/21
2439	Mallory, Jody	LA	4/3/21
2440	Mallory, Kathleen	UT	4/10/21
2441	Malm, Kay	MN	4/8/21
2442	Malone, Lauren	MD	4/10/21
2443	Malone, Sheila	CA	4/3/21
2444	Maloney, Alyce	PA	4/6/21
2445	Maloney, Marge	NY	4/9/21
2446	Malven, Tania	AZ	4/5/21
2447	Malven, Tania	AZ	4/4/21
2448	Mandel, Phyllis	CA	4/3/21
2449	Manfreda, Lori	OH	4/2/21
2450	Mangan Olf, Kristine	RI	4/7/21
2451	Mangan, Lenore	NJ	4/3/21
2452	Manley, Lynn	ME	4/9/21
2453	Manly, Candace	VA	4/13/21
2454	Mann, Louise	VA	4/13/21
2455	Mann, Mary	OH	4/9/21
2456	Mannarino, Carol	NH	4/5/21
2457	Manning, Tanya	FL	4/4/21
2458	Mantell, Nancy	MD	4/10/21
2459	Manthe, Christian	NE	4/12/21
2460	Maples, Karen	MO	4/6/21
2461	March, Lori	AZ	4/9/21
2462	Marciniak, Kimberly	MI	4/8/21
2463	Marckesano, Ann	VA	4/11/21

2464	Margulis, Elise	NJ	4/7/21
2465	Marjenka, Susan	WI	4/10/21
2466	Mark, Jean	TX	4/5/21
2467	Mark, Jean	TX	4/8/21
2468	Markert, Lynn	NH	4/3/21
2469	Markey, Kim	ID	4/11/21
2470	Marks, Christopher	OR	4/7/21
2471	Maroney, John	NY	4/13/21
2472	Marple, Jeanne	OR	4/4/21
2473	Marsh, Clarissa	OR	4/4/21
2474	Marsh, Tracy	WV	4/5/21
2475	Marshall, Beth	OR	4/3/21
2476	Marshall, Dorrine	CA	4/12/21
2477	Marshall, Laurie	VT	4/5/21
2478	Marshall, Ned	WV	4/3/21
2479	Marshall, Raymond	CA	4/2/21
2480	Martell, Lyndah	NM	4/6/21
2481	Martin, Claudia	PA	4/9/21
2482	Martin, Georgette	MI	4/13/21
2483	Martin, John	FL	4/13/21
2484	Martin, Joyce	VT	4/6/21
2485	Martin, Julie	WI	4/4/21
2486	Martin, Linda	FL	4/14/21
2487	Martin, Pam	OR	4/11/21
2488	Martin, Patricia	TX	4/3/21
2489	Martinez Ortiz, Marina	OH	4/9/21
2490	Martinez, Janie	TX	4/3/21
2491	Martinez, Joanne	NY	4/6/21
2492	Marx, Chris	NY	4/9/21
2493	Marx, Diana	MI	4/5/21
2494	Mary, Sanders	FL	4/9/21
2495	Masciotra, Marie	CO	4/3/21
2496	Masin, Howard	MO	4/7/21
2497	Maslin, Linda	PA	4/4/21
2498	Mason, Arlette	FL	4/4/21
2499	Mason, Linda	LA	4/8/21
2500	Massman, John	IL	4/6/21
2501	Masters, Clayton	CA	4/5/21
2502	Mathis, Lori	OH	4/9/21

2503	Matlack, Priscilla	NM	4/3/21
2504	Mato, Scott	PA	4/13/21
2505	Matthews, Kerin	WA	4/9/21
2506	Matthias, Linda	IN	4/3/21
2507	Mattingly, Joseph	KY	4/11/21
2508	Mattson, Lynne	WI	4/12/21
2509	Mattson, Sherry	MI	4/6/21
2510	Maximova, Christina	NV	4/14/21
2511	Maxwell, Christine	NY	4/3/21
2512	May, Ingrid	KS	4/7/21
2513	May, James	NJ	4/8/21
2514	Mayberry, Rosalind	MI	4/5/21
2515	Mayer, Mark	CA	4/3/21
2516	Mayers, Katherine	FL	4/3/21
2517	Maynard, Katherine	VT	4/9/21
2518	Mayworth, Robert	FL	4/4/21
2519	Mazzola, Pam	OH	4/6/21
2520	mc cardell, Maureen	IA	4/4/21
2521	McAdam, Kyle	NH	4/9/21
2522	McAlister, Martha	MO	4/3/21
2523	McAnally, Robert	OR	4/9/21
2524	McAnney, Joseph	AZ	4/12/21
2525	McBee, Pamela	FL	4/3/21
2526	McBride, Cheryl	LA	4/13/21
2527	McCabe, Beth	NE	4/2/21
2528	McCabe, Bradley	CA	4/7/21
2529	McCalley, Catherine	TX	4/4/21
2530	McCann, Melinda	NY	4/6/21
2531	McCann, Michael	NY	4/9/21
2532	McCarthy, Clarence	NV	4/2/21
2533	McCarthy, Joe	MO	4/6/21
2534	McCarthy, Paul	CO	4/6/21
2535	McCarty, Anthea	AZ	4/3/21
2536	McCauley, Joseph	NY	4/4/21
2537	McCheyne, Liz	NY	4/9/21
2538	McCleary, Sharon	OH	4/6/21
2539	McClendon, Polly	NC	4/11/21
2540	McClintock, Vickie	IL	4/5/21
2541	McClure, Susan	CT	4/14/21

2542	McConnaughey, Sarah	OH	4/11/21
2543	McConnell, Edna	NY	4/10/21
2544	McCoppin, Cecelia	IL	4/13/21
2545	McCort, David	CA	4/12/21
2546	McCourt, Margaret	PA	4/9/21
2547	McCoy, Elizabeth	PA	4/10/21
2548	McCoy, Kathy	KS	4/12/21
2549	McCoy, Thomas	MA	4/6/21
2550	McCoy, Virginia	NM	4/5/21
2551	McCrary, Rebecca	TN	4/12/21
2552	McCullough, Debra	IL	4/6/21
2553	McCullough, Mary Ann	PA	4/4/21
2554	McDaniel, Deb	NE	4/11/21
2555	McDermott, Linda	MN	4/3/21
2556	McDonald, Carita	TX	4/9/21
2557	McDonald, Carol	NY	4/6/21
2558	McDonald, Dianne	TX	4/10/21
2559	McDonald, Susan	PA	4/13/21
2560	McDonough, Barbara	NY	4/13/21
2561	McDonough, Mary	OH	4/14/21
2562	McEachern, Jeannine	CO	4/13/21
2563	mcfadden, terry	PA	4/4/21
2564	McGann-Zionts, Patricia	MI	4/10/21
2565	McGee, Deb	IN	4/13/21
2566	Mcgill, Gaye	MO	4/2/21
2567	McGill, Linda	MI	4/2/21
2568	McGoey, Andrew	NY	4/12/21
2569	Mcgraw, Candy	IN	4/8/21
2570	Mcgraw, Candy	IN	4/8/21
2571	McGrogan, Beth Anne	NJ	4/8/21
2572	Mcguire, Squire	OH	4/6/21
2573	mcguyer, hoyt	TX	4/5/21
2574	McHugh, Karen	FL	4/9/21
2575	McHugh, Karen	FL	4/3/21
2576	McInerney, Anton	MA	4/6/21
2577	McKean, Mary Jane	MD	4/5/21
2578	McKeehan, Chester	KY	4/7/21
2579	McKillip, Linda	PA	4/12/21
2580	McKinley, Ben	WA	4/11/21

2581	Mckinstry, Marilyn	MA	4/6/21
2582	McLain, Maureen	IL	4/11/21
2583	McLane, David	IL	4/9/21
2584	McLaughlin, Jayne	FL	4/3/21
2585	McLaughlin, Larry	CO	4/13/21
2586	Mclaughlin, Nancy	FL	4/8/21
2587	MCLAUGHLIN, PAMELA	MN	4/8/21
2588	McLaughlin, William	IL	4/7/21
2589	McLeod, Sandra	CA	4/9/21
2590	McMahon, Elizabeth	NC	4/3/21
2591	McMahon, Pam	NC	4/2/21
2592	McMurray, Deborah	CA	4/3/21
2593	McNally, Terry Bill McNally	NY	4/9/21
2594	mcnamer, andrew	IA	4/6/21
2595	McNany, Rita	PA	4/2/21
2596	McNea, Randy	CA	4/3/21
2597	McNeil, Marian	VA	4/4/21
2598	McNulty, Theresa	MA	4/10/21
2599	McNurlan, Rhonda	WI	4/10/21
2600	McQueen, Debbie	FL	4/6/21
2601	Mcvey, Rena	NC	4/5/21
2602	McWhirter, Carol	NE	4/5/21
2603	Mead, Kathryn	NC	4/4/21
2604	Meade, Melanie	PA	4/12/21
2605	Medland, Kirk	IN	4/4/21
2606	Meehan, James	FL	4/4/21
2607	Meeker, Terry	PA	4/6/21
2608	Mehan, Frances	NY	4/4/21
2609	Mehring, Gwen	FL	4/7/21
2610	mehring, margaret	TX	4/3/21
2611	Mehta, Milan	VA	4/3/21
2612	meier, brenda	KS	4/2/21
2613	Meijer, Marijke	WA	4/3/21
2614	Meissenhalter, Jackie	CA	4/8/21
2615	Meister, Debbie	CA	4/7/21
2616	MEL, MICHAEL	OH	4/11/21
2617	Meler, MA	OR	4/4/21
2618	Mellen, Glenn	TN	4/10/21
2619	Mellinger, Beth Ann	NC	4/5/21

2620	mello, joann	MA	4/4/21
2621	Melott, Stephen	NC	4/12/21
2622	Melton, April	NV	4/1/21
2623	Melton, David	CA	4/4/21
2624	Melton, Janet	CA	4/5/21
2625	Melville, Colin	NM	4/4/21
2626	Menefee, Robert	CT	4/2/21
2627	Mennel-Bell, Mari	FL	4/13/21
2628	Mens, Phillip	IN	4/4/21
2629	Mercer, Judith	OR	4/8/21
2630	Merenda, Joe	PA	4/5/21
2631	Merrick, Judy	IL	4/7/21
2632	Merritt, Sandy	CO	3/31/21
2633	Merwarth, Maureen	OH	4/2/21
2634	Messatzzia, Linda	PA	4/5/21
2635	Messmer, Kim	CA	4/3/21
2636	Metzger, Cheryl	NY	4/6/21
2637	Metzing, Pat	KS	4/4/21
2638	Metzler, Mary	NC	4/4/21
2639	Metzler, Paul	PA	4/14/21
2640	Meyer, Carol	MO	4/7/21
2641	meyer, colonel	FL	4/3/21
2642	Meyer, Jillana	OR	4/3/21
2643	Meyer, Norva	VA	4/12/21
2644	Meyers, Ray	IN	4/6/21
2645	Meyers, Robert	NY	4/5/21
2646	Meyers, Sue	IL	4/12/21
2647	Meza, Debra	IN	4/2/21
2648	Michael, Veronica	CA	4/7/21
2649	Michalek, Dorothy	VA	4/10/21
2650	Michaud, Susan	NC	4/10/21
2651	michniewicz, Barbara	MI	4/3/21
2652	Mickelson, David	MN	4/5/21
2653	Mickey, Kyndal	FL	4/2/21
2654	Middaugh, Linda	OR	4/11/21
2655	Midthune, Jill	MD	4/7/21
2656	Mikel, Toni	AR	4/5/21
2657	Mikesell, Mary	IN	4/6/21
2658	Miklos, Katalin	MI	4/3/21

2659	Mikulak, Marcia	NM	4/2/21
2660	Miles, DoRi	NY	4/4/21
2661	Miles, Leah	IN	4/11/21
2662	Miles, Melissa	VT	4/5/21
2663	Milione, Regina	PA	4/13/21
2664	Millemaci, Linda	NY	4/7/21
2665	Miller-Lyons, Judy	NY	4/5/21
2666	miller, carol	NE	4/10/21
2667	Miller, Dennis	AL	4/14/21
2668	Miller, Dianne	WA	4/5/21
2669	Miller, Donna	WV	4/7/21
2670	Miller, GARY	AR	4/9/21
2671	Miller, Helen	NY	4/11/21
2672	Miller, Jenna	WI	4/9/21
2673	Miller, Joan	FL	4/3/21
2674	Miller, Joseph	OH	4/6/21
2675	Miller, Kathy	IN	4/12/21
2676	Miller, Laura	MI	4/4/21
2677	Miller, Nancy	WI	4/4/21
2678	Miller, Nancy	OH	4/6/21
2679	Miller, Pam	CA	4/10/21
2680	Miller, Pamela	KY	4/11/21
2681	Miller, Robert	MT	4/2/21
2682	Miller, Sandra	TX	4/5/21
2683	Miller, Sherlynn	NJ	4/7/21
2684	Miller, Tamara	VA	4/4/21
2685	Miller, William	PA	4/6/21
2686	Mills, Sylvia	VA	4/6/21
2687	Milo, Jennifer	VT	4/3/21
2688	Mina, Diane	MA	4/2/21
2689	Miner, Trudy	FL	4/9/21
2690	Minerva, Mary Lou	FL	4/5/21
2691	Minerva, Mary Lou	FL	4/7/21
2692	Minick, Audrey	MI	4/3/21
2693	Minor, David	GA	4/6/21
2694	Minor, David	GA	4/13/21
2695	Minotti, Mariah	WV	4/6/21
2696	Minsky, Nina	WA	4/1/21
2697	Mitchell, Beverly	ID	4/6/21

2698	Mitchell, Brett	IN	4/2/21
2699	Mitchell, Ina	CA	4/3/21
2700	Mitchell, Janet	AK	4/4/21
2701	Mitchell, Sherie	CO	3/31/21
2702	Mitchell, Sherry	WV	4/5/21
2703	Mitchell, Summer	FL	4/3/21
2704	Mo, Ba	OR	4/5/21
2705	Mobley, David	GA	4/12/21
2706	Mobley, Henry	VA	4/13/21
2707	Mock, Beth	CO	4/3/21
2708	Mockler, Alicen	ID	4/11/21
2709	Modrell, Carol	NH	4/2/21
2710	Moeller, Gerard	DE	4/3/21
2711	Moen, Evangeline	MN	4/10/21
2712	Moerman, Mark	WA	4/11/21
2713	Moess, Silvija	IL	4/3/21
2714	Mogilnicki, Janet	MA	4/7/21
2715	Moir, Monica	NM	4/5/21
2716	Molatch, Kathleen	ME	4/7/21
2717	Molina, Nelson	CA	4/10/21
2718	Mollen, Phyllis	NY	4/6/21
2719	Mollet, Monique	TN	4/3/21
2720	Monie, Peter	TX	4/5/21
2721	Montgomery, Donna	KY	4/12/21
2722	Montgomery, Karen	AZ	4/8/21
2723	Montgomery, Mary	MO	4/13/21
2724	Mooney, Scott	NJ	4/12/21
2725	Moore, Catherine	NY	4/6/21
2726	Moore, Eilene	OH	4/3/21
2727	Moore, Lauren	MI	4/6/21
2728	Moore, Molly	AZ	4/9/21
2729	Moore, Patty	OH	4/8/21
2730	Moore, Patty	OH	4/2/21
2731	moore, rose	MI	4/2/21
2732	Moore, Sally Jane	FL	4/11/21
2733	Moore, Sharlee	CA	4/3/21
2734	Moot, Kathryn	KY	4/10/21
2735	Morale, Annmarie	TX	4/4/21
2736	Moreno, Angel	NJ	4/9/21

2737	Moreno, Maya	OR	4/6/21
2738	Morero, Linda	AZ	4/10/21
2739	Morgan, David	MI	4/10/21
2740	Morgan, Joanne	OH	4/2/21
2741	Morgan, Staris	NC	4/8/21
2742	Moritz-Hale, Gretchen	NM	4/10/21
2743	Mormann, Kelly	NJ	4/12/21
2744	Morneau, Daniel	FL	4/5/21
2745	Morris, Jane	TN	4/13/21
2746	Morris, Keith	CA	4/2/21
2747	Morris, Ken	TX	4/4/21
2748	Morris, Philippe	MD	4/9/21
2749	Morris, Richard	AZ	4/3/21
2750	Morris, Sherry	TN	4/5/21
2751	Morris, Theresa	VA	4/6/21
2752	Morris, Zack	ID	4/5/21
2753	Morrison, Bruce	IA	4/7/21
2754	Morrison, Colleen	IL	4/14/21
2755	Morrison, Eileen	IL	4/4/21
2756	Morrison, Sam	NY	4/6/21
2757	Morrissey, Lynne	GA	4/3/21
2758	Morrow, Ellen	MN	4/12/21
2759	Morrow, John	OR	4/5/21
2760	Morrow, Sarah	CA	4/3/21
2761	morse, sharon	CO	4/4/21
2762	Mosa, Ali	WA	4/4/21
2763	Moscatt, Carlene	MD	4/14/21
2764	Moscoso, Arjuna	CO	4/5/21
2765	Moser, Bettina	FL	4/7/21
2766	MOSHER, JEFF	WI	4/5/21
2767	Mosovich, Jill	FL	4/12/21
2768	Moss, Michael	MI	4/4/21
2769	Moszyk, John	MO	4/2/21
2770	Mott, Marcie	TN	4/10/21
2771	Mott, Marcie	TN	4/13/21
2772	Motter, Susan Kit	MI	4/4/21
2773	Mottl, Deborah	IL	4/6/21
2774	Mottl, Deborah	IL	4/10/21
2775	Moulton, Emily	CT	4/5/21

2776	Moyer, Mindy	PA	4/9/21
2777	Moynahan, Susan	CA	4/2/21
2778	mozer, eliza	NY	4/4/21
2779	Mueller, Barbara	MO	4/12/21
2780	Mueller, Walter	IN	4/2/21
2781	Mullady, Teresa	NY	4/6/21
2782	Mullaly, Patricia	MI	4/11/21
2783	Mullen, Dianna	NE	4/3/21
2784	Mullikin, Linda	KS	4/7/21
2785	Mullikin, Michael	IL	4/4/21
2786	Mullineaux, Andrew	PA	4/8/21
2787	munhall, robert	CT	4/6/21
2788	MUNRO, andrew	NC	4/5/21
2789	Murchison, Brenda	LA	4/3/21
2790	Murdock, Pamela	CO	4/8/21
2791	Murdock, PEGGY	IA	4/3/21
2792	Mureddu, MaryAnne	PA	4/8/21
2793	Murnane, Donald	WI	4/3/21
2794	Murphy, Ann-Marie	CA	4/7/21
2795	Murphy, Carol	CA	4/6/21
2796	Murphy, Kathryn	FL	4/5/21
2797	murphy, kimberly	KY	4/3/21
2798	Murphy, Lynn	AZ	4/6/21
2799	Murphy, Thomas	NY	4/3/21
2800	murray, Clare	TX	4/7/21
2801	Murray, Daphne	PA	4/6/21
2802	Murray, Jean	AL	4/3/21
2803	Murray, Joan	CA	4/4/21
2804	Murray, Karen	OR	4/5/21
2805	Murray, Miriam	OH	4/8/21
2806	Muscat, Laurie	VT	4/8/21
2807	Musser, Jeralyn	NY	4/4/21
2808	Mutchnick, Edward	NY	4/3/21
2809	Muth, Ellen	AK	4/5/21
2810	mutis, leopoldo	FL	4/6/21
2811	My family LOVES American, Eve	OR	4/11/21
2812	Myers, Alexis	PA	4/10/21
2813	Myers, Andrea	NC	4/3/21

2814	Myers, Ed	MS	4/13/21
2815	Myers, Linda	IN	4/6/21
2816	Myers, Shirley	NM	4/9/21
2817	Myers, Susan	PA	4/4/21
2818	Mylet, Sharon	PA	4/8/21
2819	Naftal, Stephanie	MT	4/13/21
2820	Nagorski, Jeff	MN	4/4/21
2821	Nagy, Marilee	NC	4/8/21
2822	Nakamura, Roxanna	UT	4/7/21
2823	Nancarrow, Judith	IN	4/2/21
2824	Naper, Charlene	MA	4/5/21
2825	Napoleon, Alexandra	PA	4/13/21
2826	Napolitani, Kathetine	NY	4/3/21
2827	Napora, Carol Lynn	MI	4/8/21
2828	Narby, John	CO	4/4/21
2829	Nash, Catherine	CA	4/4/21
2830	Nations, Chrystle	TX	4/12/21
2831	Neal, J	CA	4/3/21
2832	Neal, Nancy	VA	4/8/21
2833	Nehring, Roger	SD	4/5/21
2834	Neidig, Craig	WV	4/9/21
2835	Nektalova, Linda	CT	3/30/21
2836	Nelms, Glenda	TX	4/3/21
2837	Nelson, Cherith	MN	4/12/21
2838	Nelson, David	NM	4/10/21
2839	Nelson, Karen	WI	4/4/21
2840	Nelson, Patricia	GA	4/14/21
2841	Nelson, Paul	WV	4/11/21
2842	Nelson, Sue	GA	4/10/21
2843	Nelson, Susan	WI	4/5/21
2844	Nelson, Tana	MI	4/3/21
2845	Nesbit, Ian	NY	4/9/21
2846	Nesbitt, Mary Alice	VA	4/6/21
2847	Nettleton, John	OR	4/5/21
2848	Neu, Jeffery	OH	4/3/21
2849	Neubecker, Eva	KS	4/9/21
2850	Neuman, Loretta	MN	4/6/21
2851	Neumann, Catherine	NM	4/6/21
2852	Neumann, Dee	VA	4/8/21

2853	Neumeister, John	NY	4/7/21
2854	Newberg-Fisher, Rosalie	CA	4/14/21
2855	Newberg, Brian	OH	4/4/21
2856	Newman-Perskin, Marcie	NY	4/3/21
2857	Newman, Jo	TX	4/8/21
2858	Newquist, Deborah	PA	4/4/21
2859	Newsom, Dana	AZ	4/4/21
2860	Nicholson, Margaret	MD	4/2/21
2861	Nickels, Kitty	NC	4/11/21
2862	Nicola, Lynn	OH	4/7/21
2863	Niebuhr, Denice	WI	4/8/21
2864	Niederman, Michael	NY	4/3/21
2865	Niedner, Sylvia	OH	4/13/21
2866	Niekamp, Joseph	OK	4/4/21
2867	Nielsen-Johns, Lois M	MN	4/11/21
2868	Nielsen, Hanne J.	NY	4/11/21
2869	Nierstedt, Bill	NJ	4/3/21
2870	Nies, Caitlin	FL	4/5/21
2871	Nilsson, Derinda	NY	4/4/21
2872	Niquette, Leslie	MA	4/5/21
2873	Nishio, Sandora	CA	4/10/21
2874	Nissani, Sarita	OR	4/6/21
2875	Noguera, Indigo	AZ	4/4/21
2876	Nolan, Mark	NM	4/5/21
2877	Nolterieke, David	CA	4/11/21
2878	NooN, Wendy	FL	4/3/21
2879	Noonan, Michael	WI	4/12/21
2880	Norcross, Cathy	GA	4/6/21
2881	NORDEMAN, VALERIE	CA	4/6/21
2882	Norman, Gina	OR	4/7/21
2883	Norris, William	TN	4/4/21
2884	NORTH, Joyce	AZ	4/8/21
2885	North, Linda	NC	4/3/21
2886	Northrup, Lori	WA	4/14/21
2887	Norton, Lorraine	MI	4/6/21
2888	Nosek, Kelly	IL	4/13/21
2889	Novak, Ruth	IL	4/12/21
2890	Novkov, Linda	FL	4/2/21
2891	Nowicki, Kathleen	KY	4/3/21

2892	Nowicki, Paula	CT	4/4/21
2893	Nowlan, Donna	MA	4/9/21
2894	Nozzi, Barbara	IL	4/9/21
2895	Nugent, Nanci	NY	4/8/21
2896	Nyfors, Alexandra	WA	4/2/21
2897	Nyiri, Les	PA	4/13/21
2898	Nystel, Jane	VA	4/4/21
2899	O, Nancy	PA	4/12/21
2900	O'Brien, Bill	OR	4/6/21
2901	O'Connell, Nancy	IA	4/8/21
2902	O'Halloran, Matthew	ME	4/4/21
2903	O'Neill, Eileen	CT	4/2/21
2904	Oachs, Sherry	MN	4/5/21
2905	Oberline, Beverly	FL	4/3/21
2906	Oberweiser, Ed	CA	4/5/21
2907	OBrien, Annette	NY	4/4/21
2908	OBrien, Beth	SC	4/3/21
2909	OBrien, Daniel	NY	4/2/21
2910	OBrien, Diane	AK	4/4/21
2911	Obrien, Janet	OH	4/5/21
2912	Obrien, Kathryn	NY	4/5/21
2913	Obrien, Victoria	NY	4/9/21
2914	Obringer, Patricia	IN	4/9/21
2915	Ochoa, Carla	FL	4/3/21
2916	Oconnell, Mary	NH	4/3/21
2917	OConnor, Janet	KS	4/11/21
2918	Oconnor, Patti	MN	4/4/21
2919	ODell, Glenda	IL	4/3/21
2920	ODell, Glenda	IL	4/7/21
2921	ODonnell, Karen	AR	4/6/21
2922	Odum, Dianne	NC	4/6/21
2923	Offerman, Dean	FL	4/12/21
2924	Ogle, Cynthia	TX	4/10/21
2925	Ogren, Lorrie	WI	4/7/21
2926	Oguin, Dianne	IN	4/10/21
2927	OHara, Kathleen	WA	4/3/21
2928	Ohare, Emily	NC	4/13/21
2929	Ohme, Ann	PA	4/13/21
2930	OHNER, Dolores	WI	4/3/21

2931	Oholorogg, Dana	CA	4/3/21
2932	Okinsky, Cody	NJ	3/30/21
2933	Okinsky, Cody	NJ	3/30/21
2934	Okome, Mojubaolu	NY	4/10/21
2935	Oldham, Maureen	MA	4/11/21
2936	OLeary, Megan	CT	4/5/21
2937	Olewinski, Pamela	WI	4/5/21
2938	Olivares, Raul A	WI	4/13/21
2939	Oliveira, P. D.	MN	4/7/21
2940	Oliver-Poore, Sandra	OR	4/8/21
2941	Oliver, Daniel	WI	4/3/21
2942	Oliver, JoAnne	TX	4/4/21
2943	Oliveros, Donni	TX	4/6/21
2944	Olson, Chris	IA	4/11/21
2945	Olson, Janice	WI	4/13/21
2946	Olson, Lanny	MN	4/5/21
2947	Olson, Neil	IL	4/3/21
2948	Olson, Pamela	CO	4/13/21
2949	Olson, Penny	WA	4/10/21
2950	Olson, Raymond	MI	4/3/21
2951	Olson, Robert	WA	4/6/21
2952	Oms Espinosa, Tehani	FL	4/11/21
2953	Oneal, Amanda	KY	4/2/21
2954	ONeal, Mary	MA	4/7/21
2955	ONeill, Larry	CO	4/13/21
2956	ONeill, Sandy	TN	4/4/21
2957	Opp, Nancy	MA	4/4/21
2958	Oppelt, Theresa	NC	4/3/21
2959	Ordan, Judith	NY	4/5/21
2960	Ortiz, Manuela	CA	4/10/21
2961	Osada, Barbara Osada	PA	4/3/21
2962	Osborn, Lynn	FL	4/13/21
2963	Osborn, Mark	MO	4/13/21
2964	OShell, William	FL	4/7/21
2965	Osland, Michele	SC	4/2/21
2966	Ostlinger, Frank	NJ	4/7/21
2967	Ostrander, Ken	VA	4/9/21
2968	Osullivan, Shelley	MI	4/10/21
2969	Oswald, Gerald	UT	4/4/21

2970	Ott, Carl	FL	4/14/21
2971	Ounsworth, Charleen	SC	4/6/21
2972	Outen, Michael	NC	4/2/21
2973	Overstreet, Annette	VA	4/2/21
2974	Owen, Catherine	GA	4/11/21
2975	Owen, Elle	AZ	4/4/21
2976	Owyang, Sheryl	CA	4/3/21
2977	P, Andy	CA	4/9/21
2978	Paap, Stewart	CO	4/3/21
2979	pace, john	CT	4/2/21
2980	Pace, Ruth Ann	MI	4/10/21
2981	pacifico, lynn	NY	4/4/21
2982	Packard, Connie	WA	4/8/21
2983	Packard, Joan	NY	4/5/21
2984	Page, Nichola	FL	4/7/21
2985	Page, Rebecca	UT	4/10/21
2986	Pagel, Andrew	WI	4/4/21
2987	Paiine, Laura	MA	4/5/21
2988	Palcic, Patrick	NY	3/30/21
2989	Palen, Norma	MI	4/10/21
2990	Palm, John	FL	4/7/21
2991	Palmer, Patrice	NV	4/9/21
2992	Palmquist, Wendy	NH	4/13/21
2993	pan, pinkyjain	AZ	4/3/21
2994	Pantaleo, Desiree	AZ	4/5/21
2995	Pappalardo, Susan	NJ	3/30/21
2996	Paquette, Claire	AL	4/8/21
2997	Parcells, Julie	NM	4/3/21
2998	Pare, Nancy	WA	4/5/21
2999	Parham, Douglas	MA	4/6/21
3000	Parker, Amy	CO	4/7/21
3001	Parker, Craig	TX	4/6/21
3002	Parker, Deborah	MI	4/4/21
3003	parker, kelvin	OH	4/7/21
3004	Parker, Peggy	TX	4/4/21
3005	Parker, Sharon	ID	4/9/21
3006	Parker, Terry	GA	4/6/21
3007	Parkin, Pauline	PA	4/8/21
3008	Parks, Julian	NY	4/9/21

3009	Parnall, Joanne	MI	4/3/21
3010	Parsons, Kristen	NY	4/9/21
3011	Partan, Kathryn	MD	4/7/21
3012	Partlow, Michael	WA	4/12/21
3013	Pasquarello, Sherry	PA	4/7/21
3014	Patel, Sagar	MA	4/5/21
3015	Patenaude, Cynthia	NY	4/4/21
3016	Patrick, D. Kaye	IN	4/3/21
3017	PATRIZIO, SANDRA	NY	4/10/21
3018	Patterson, Beverlee	NY	4/3/21
3019	Patterson, Hayley	MS	4/5/21
3020	Patterson, Kay	PA	4/5/21
3021	Patterson, Sally	GA	4/2/21
3022	Paul, Tamara	CA	4/8/21
3023	Paulson, Alan	PA	4/3/21
3024	Pauw, Elizabeth	CA	4/8/21
3025	Pawloski, Linda	AZ	4/9/21
3026	pax, lynn	NY	4/3/21
3027	Payne, Jan	MI	4/3/21
3028	Payne, Janice	MT	4/11/21
3029	Payton, Dorthea	MO	4/1/21
3030	peach, elizabeth	CO	4/6/21
3031	Peardot, Wendy	MN	4/6/21
3032	Pearl, Nancy	CT	4/3/21
3033	Pearson, Anke	MI	4/5/21
3034	Pearson, Valerie	WI	4/10/21
3035	Peavy, Jerry	CA	4/4/21
3036	Peck, Richard	AZ	4/4/21
3037	Pecsok, Karen	MO	4/11/21
3038	Pederson, Kay	MN	4/10/21
3039	Peischl, Jan	PA	4/9/21
3040	Peixoto, Andy	CA	4/5/21
3041	Pelletier, Rae	NY	4/3/21
3042	Pelzer, Ann	OH	4/4/21
3043	Pelzer, Ann	OH	4/8/21
3044	Pendergraft, Leanne	KS	4/7/21
3045	Pendley, Kristina	GA	4/5/21
3046	Penegar, Dave	TN	3/31/21
3047	Penfield, Caroline	FL	4/4/21

3048	Penn, Janie	MA	4/5/21
3049	Penrose, Linda	CA	4/5/21
3050	Pentz, Elise	IN	4/6/21
3051	Peoples, Beverly	PA	4/4/21
3052	Pepin, Constance	MN	4/13/21
3053	Pepin, Dan	PA	4/7/21
3054	Perakis, Stephen	OH	4/4/21
3055	Perani-Welsh, Carri	WV	4/10/21
3056	Percopo, Dominic	CT	4/3/21
3057	Pereira, Jacqueline	NM	4/4/21
3058	Perell, Roberta	FL	4/3/21
3059	Perez, Diego	NY	4/11/21
3060	Perez, Karen	MS	4/3/21
3061	Perez, Velma	TX	4/3/21
3062	Perkins, Lori	CA	4/9/21
3063	Perley, Ann	SC	4/12/21
3064	Pernas, Alberto	NJ	4/12/21
3065	Perry, Beth	WA	4/9/21
3066	Perry, Jeffrey	AZ	4/7/21
3067	Perry, Ruth	NM	4/4/21
3068	Persky, Hilary	NJ	4/11/21
3069	Perucki, Kerri	FL	4/14/21
3070	Pete, Edward	AZ	4/4/21
3071	peters, sheryl	NC	4/6/21
3072	Petersen, Wendy	CA	4/7/21
3073	PetersFarnham, Kolleen	NC	4/12/21
3074	Peterson-Wheeler, Betty	WA	4/2/21
3075	Peterson, Ashley	OR	3/31/21
3076	Peterson, Catherine	SD	4/9/21
3077	Peterson, Cynthia	MN	4/4/21
3078	Peterson, Karen	AZ	4/2/21
3079	Peterson, Laurence	IL	4/6/21
3080	Peterson, Marta	WA	4/7/21
3081	Peterson, Nicole	NY	4/3/21
3082	Petitpas, Bethanie	MA	4/6/21
3083	Petri, Nancy	FL	4/4/21
3084	Petrock, Michael	FL	4/5/21
3085	Petroff, Gloria	IN	4/9/21
3086	Petrowski, Lynda	VA	4/8/21

3087	Petruzzi, Maryke	NY	4/6/21
3088	Pezze, Jurate	IL	4/3/21
3089	Pfeister, Sheila	NY	4/7/21
3090	Pfitzner, james	NY	4/2/21
3091	Phalon, Evan	NY	4/12/21
3092	Phelan, Linda	NY	4/5/21
3093	Phila, Hoopes	MD	4/6/21
3094	Phillips, Betty	TX	4/12/21
3095	phillips, Buddy	MT	4/10/21
3096	Phillips, Grace	ME	4/13/21
3097	Phillips, Marilyn	WA	4/7/21
3098	Phillips, Sara	PA	4/10/21
3099	Phillips, Shirley	FL	4/8/21
3100	Piard, Zanne	NY	4/4/21
3101	Piasecki, Kimberly	PA	4/13/21
3102	Piccione, Maryann	FL	4/7/21
3103	Pickering, Sheronne	FL	4/7/21
3104	Pickett, Judith	NY	4/7/21
3105	Piel-Glass, Amy	OH	4/6/21
3106	Pielstick, Mary	ID	4/11/21
3107	Pierce, Deborah	MN	4/12/21
3108	Pierce, Harley	MI	4/3/21
3109	Pike, Benjamin	CA	4/7/21
3110	Pimentel, Melvin	IL	4/5/21
3111	Pinckard, Cory	OR	4/2/21
3112	Pink, Lily	NY	4/5/21
3113	Pinkerton, Anne	PA	4/3/21
3114	Pino, Tami	NJ	4/4/21
3115	Piper, Michael	IN	4/6/21
3116	Pitchford, Jayne	CA	4/10/21
3117	Pitsch, Deborah	MI	4/3/21
3118	Pitts, Ves	NY	4/2/21
3119	Plank, Juliane	TX	4/14/21
3120	Plantz, Paulette	NY	4/8/21
3121	Plauche, Elisa	HI	4/4/21
3122	Plummer, Mary	WI	4/11/21
3123	Pollard, Pat	OH	4/7/21
3124	Polys, Nicholas	VA	4/6/21
3125	Pooler, Kimberly	NH	4/11/21

3126	Poplin, Rebecca	OK	4/3/21
3127	Porter, Harriette	OK	4/3/21
3128	Post, Sibyl	HI	4/5/21
3129	Pottinger, RuthAnn	VT	4/10/21
3130	Potts, Willie	WV	4/5/21
3131	Potzka, Tedric	AZ	4/3/21
3132	Powell, Julia	TX	4/5/21
3133	Powell, Stephanie	MO	4/3/21
3134	Powers, Scott	ME	4/3/21
3135	powers, toby	IL	4/8/21
3136	Preble-Niemi, Oralia	FL	4/9/21
3137	Preston, Lucy	KY	4/6/21
3138	Price, Donna	WI	4/11/21
3139	PRICE, JENNIFER	UT	4/11/21
3140	Price, Johnny	IN	4/10/21
3141	Price, Mary	NY	4/9/21
3142	Price, Mary	NY	4/9/21
3143	Pridgeon, Linda	MO	4/7/21
3144	Principe, Therese	WI	4/13/21
3145	Pringle, Vernon	VA	4/6/21
3146	Pro, Leo	NJ	4/2/21
3147	Proffitt, Susan	IN	4/6/21
3148	Proper, Kathi	FL	4/3/21
3149	Provost, Sandra	MA	4/4/21
3150	prudden, Beth	MI	4/6/21
3151	Pruet, Mary	TX	4/5/21
3152	Ptaszek, Sonja	MI	4/14/21
3153	Puett, Barbara	TX	4/13/21
3154	Purchase, Deeanne	CA	4/5/21
3155	purnell, thomas	NJ	4/2/21
3156	Putman, Anna	OR	4/7/21
3157	Putzer, Destinee	NC	4/4/21
3158	Qualls, Bobbi	OK	4/2/21
3159	Quick, David	AZ	4/3/21
3160	Quigley, April	CA	4/6/21
3161	Quinn, Kathleen	NC	4/7/21
3162	Quintela, Michelle	FL	4/3/21
3163	Quiram, Carlys	MN	4/2/21
3164	Quitter, Lonnie	WA	4/2/21

3165	r, t	VA	4/2/21
3166	R. Coward, Colin	CA	4/5/21
3167	Rabin, Pat	FL	4/9/21
3168	Radder, Patricia	SC	4/4/21
3169	Rader, Gregory	MA	4/4/21
3170	Radke, James	MO	4/10/21
3171	Radko, Danuta	MA	4/10/21
3172	Rahikainen, Patricia	WI	4/2/21
3173	Raikin, Pearl	VA	4/3/21
3174	Raiman, Joyce	MI	4/9/21
3175	Ramaci, Lisa	NY	4/3/21
3176	Rambow, Rosemary	TX	4/10/21
3177	Ramgopal, Lakshmi	CA	4/5/21
3178	Ramsey, Laurel	OR	4/6/21
3179	Ramsey, Steven	AZ	4/7/21
3180	Randall, L.	MN	4/7/21
3181	Rankl, Linda	RI	4/5/21
3182	Ranta, Brian	OR	4/2/21
3183	Rapp, Andrea	CO	4/6/21
3184	Rasco, James	AZ	4/3/21
3185	Rasmussen, Annie	SC	4/4/21
3186	Rasmussen, JoAnn	UT	4/5/21
3187	Rausch, Janie	CO	4/12/21
3188	Ravenstein, Kate	DE	4/4/21
3189	Ravitz, Lori	FL	4/4/21
3190	Ray, Julie	LA	4/8/21
3191	Ray, Sharon	CO	4/4/21
3192	Raymond, Allison	WA	4/1/21
3193	Raymond, Debra	NC	4/8/21
3194	Rebecca, Reese	IN	4/9/21
3195	Reboratti., Eduardo	PA	4/12/21
3196	Recinos, Genevieve	CA	4/4/21
3197	Redden, Cheryl	IL	4/14/21
3198	Redman, Sheila	OR	4/7/21
3199	Redmon, Lorri	OK	4/7/21
3200	Reed, Brian	CA	4/12/21
3201	Reed, Michael	IL	4/2/21
3202	Reese, John	NM	4/3/21
3203	Reeves, Maryann	OH	4/5/21

3204	Regalado, Geoff	CA	4/3/21
3205	Rego, Sonia	FL	4/5/21
3206	Rehder, Annette	MN	4/12/21
3207	Reichel-Halverson, Susan	MN	4/3/21
3208	Reid, Cherryl	SC	4/10/21
3209	Reid, Patricia	PA	4/3/21
3210	Reiff, David	MD	4/6/21
3211	Reillo, Hector	MN	4/11/21
3212	Reilly, Leslie	NM	4/4/21
3213	Reimer, Paul	CO	4/2/21
3214	Reinhard, Althea	NY	4/3/21
3215	Reisfelt, Jim	CA	4/4/21
3216	Remington, Margaret	OR	4/3/21
3217	Rommel, Elyce n Philip 'Vet'	TX	4/5/21
3218	Rennacker, Ann	CA	4/8/21
3219	Renne, Karen	MT	4/9/21
3220	Ressler, Maryann I	IA	4/14/21
3221	Restrepo, Maria	NJ	4/8/21
3222	Restrepo, Maria	NJ	4/8/21
3223	Reuer, Quentin	WA	4/9/21
3224	Reuer, Quentin	WA	4/7/21
3225	Reuter, Rocky	TN	4/5/21
3226	Revis, Cathy	FL	4/10/21
3227	Reynolds, Alan	ID	4/4/21
3228	Reynolds, Brian	NJ	4/12/21
3229	Reynolds, Pip	CA	4/4/21
3230	Reynolds, Taomi	OR	4/6/21
3231	Rezelman, Kathryn	NY	3/31/21
3232	rezner, mary	CA	4/3/21
3233	Rhoads, Donald	IN	4/11/21
3234	Rhoads, Kirk	AR	4/2/21
3235	Rhodes, John	NY	4/11/21
3236	Rhodes, Margaret	VA	4/4/21
3237	Rhodus, Jane	MO	4/10/21
3238	Ribolla, Ellen	CT	4/10/21
3239	Riccobene, Rachael	FL	4/10/21
3240	Rice, Lisa	AR	4/6/21
3241	Rice, Lisa	AR	4/11/21
3242	Rice, William	AZ	4/4/21

3243	Rich, Robert	AZ	4/6/21
3244	Richard Jr, Charles	CA	4/10/21
3245	Richards-Taylor, Virginia	NH	4/10/21
3246	Richards, Gwen	CA	4/2/21
3247	Richards, Robert	CA	4/3/21
3248	richardson, kate	NJ	4/8/21
3249	Richardson, Kim	NM	3/31/21
3250	Richkus, John	NJ	4/10/21
3251	Richmond, Gail	MA	4/9/21
3252	Rico, Drusilla	PA	4/5/21
3253	Riddle, Darlene	FL	4/9/21
3254	riehart, dale	CA	4/2/21
3255	Rieke, Judy	WA	4/2/21
3256	Rieke, Judy	WA	4/3/21
3257	Rierson, Barbara	TX	4/11/21
3258	rifon, Rachel	TX	3/30/21
3259	Riker, Mary	DE	4/2/21
3260	Rillema, Gary	MT	4/6/21
3261	Rinker, Jean	MA	4/5/21
3262	Riojas, Maria	TX	4/4/21
3263	Rios, Lori	IL	4/2/21
3264	Rischel, Lauren	CA	4/7/21
3265	Riser, Patrick	TN	4/14/21
3266	Ritsko, Judith	NV	4/7/21
3267	Ritter, Mary Lou	OR	4/11/21
3268	Ritter, Valerie	VT	4/3/21
3269	ritz, angelita	GA	4/3/21
3270	Rivera, Nayeli	IL	3/31/21
3271	Rivers, Ronna	MI	4/7/21
3272	Rivers, Ronna	MI	4/12/21
3273	Rizza, Paul	MI	4/3/21
3274	Rizzo, Richard	FL	4/3/21
3275	Roaten, Doug	NC	4/4/21
3276	Rob, Reg	OH	4/6/21
3277	Robbins, Elaine	NC	4/13/21
3278	Robbins, Karee	UT	4/4/21
3279	Roberts-Ibarra, Susan	CA	4/13/21
3280	ROBERTS, DANE	GA	4/12/21
3281	Roberts, Eileen	NY	4/9/21

3282	Roberts, Ellen	MD	4/10/21
3283	Roberts, Elli	CA	4/4/21
3284	Roberts, Erin	TN	4/6/21
3285	Roberts, Jean	WI	4/4/21
3286	Roberts, Karen	VA	4/4/21
3287	Roberts, Marilyn	MA	4/11/21
3288	Roberts, Ruth	TX	4/2/21
3289	Robertson, Cori	CA	4/13/21
3290	Robin, Judy	KY	4/6/21
3291	Robinson, Babette	IL	4/8/21
3292	Robinson, Debra	CA	4/13/21
3293	Robinson, Julie	NC	4/5/21
3294	Robinson, Virginia	NH	4/13/21
3295	Rocha, Seth	TX	3/31/21
3296	Rocha, Sheila	NE	4/11/21
3297	Rochelle, Lisa	VT	4/6/21
3298	Rock, Marilyn	CT	4/8/21
3299	Rockwell, Anne	CT	4/9/21
3300	Roddick, Melinda	CO	4/10/21
3301	Rodeghier, Chris	WI	4/3/21
3302	Rodgers, Camie	KY	4/4/21
3303	Rodman, James	IN	4/4/21
3304	Rodriguez, Lourdes M	NY	4/1/21
3305	Rodriguez, Michael	CA	4/9/21
3306	Rodriguez, Rebecca	NC	4/10/21
3307	Roe, Carol	FL	4/4/21
3308	Roe, Patrice	MD	4/10/21
3309	Rogenmoser, Sharon	CO	4/3/21
3310	Rogers, Barbara	NY	4/10/21
3311	Rogers, Deborah	CA	4/9/21
3312	Rogers, Dennis	MA	4/2/21
3313	Rogers, Katheryn	TX	4/6/21
3314	Rogge, Mary	NE	4/4/21
3315	Rohr, Eva	AZ	4/7/21
3316	Rohrbach, Donald	TX	4/11/21
3317	Rojas, Anjali	CA	4/2/21
3318	Roland, James	VT	4/10/21
3319	Roldan, Hector	NY	4/8/21
3320	rollins, Sue	OK	4/12/21

3321	Romano, Mary	MI	4/14/21
3322	Romero-Kibiloski, E.S.	VA	4/10/21
3323	Roney, Laura	IL	4/6/21
3324	Ronquillo, Elena	CA	4/12/21
3325	Rooks, Jacob	IN	4/7/21
3326	Rooks, Jacob	IN	4/14/21
3327	Rosa, Nicole	CO	4/3/21
3328	Rosalik, Barbara	MI	4/2/21
3329	Rosas, Lori	TX	4/3/21
3330	Rose, Eric	FL	4/9/21
3331	Rose, Janice	OR	4/2/21
3332	Rose, Joel	NY	4/11/21
3333	Rose, Pat	CA	4/9/21
3334	Rose, Rachel	NV	4/8/21
3335	Rose, Susan	CO	4/10/21
3336	Rose, Sylvia	CA	4/13/21
3337	Rose, Toni	IL	4/11/21
3338	Rosenzweig, Aline	TX	4/5/21
3339	Rosken, Esther	TN	4/7/21
3340	Ross, Anne	NY	4/13/21
3341	Ross, Jean	MN	4/5/21
3342	Ross, Kristoffer	NY	4/13/21
3343	Ross, Laurel	UT	4/10/21
3344	Ross, Patricia	IL	4/13/21
3345	ross, paul	OH	4/4/21
3346	Ross, Stephanie	MN	4/2/21
3347	Roth, Victoria	TX	4/10/21
3348	Rothenberg, Jane	CA	4/2/21
3349	Rothweiler, MJ	MO	4/11/21
3350	Rousseau, Gerrie	VT	4/10/21
3351	Rout, Les	MI	4/7/21
3352	Rowan, Laurie	ME	4/6/21
3353	Rowe, Ann	CO	4/7/21
3354	Rowland, Catherine	TX	4/6/21
3355	Rowlands, Alan	OR	4/5/21
3356	Rowles, Paula	NV	4/3/21
3357	royster, george	TN	4/3/21
3358	Ruano, Ila	TX	4/6/21
3359	Ruas, Carla	DC	3/29/21

3360	Rubino, Karen	NY	4/7/21
3361	Rudeen, Janice	OR	4/4/21
3362	Rudolph, Carol	AZ	4/4/21
3363	Rudy, Katherine	NY	4/6/21
3364	Ruffolo, Marc	CA	4/8/21
3365	Ruhl, Margaret-Gail	OH	4/9/21
3366	Ruksza-Lenz, Arlene	IL	4/4/21
3367	Runner, Julie	KY	4/13/21
3368	Rupp, Karin	NJ	4/13/21
3369	Ruschaupt, Amy	VA	4/10/21
3370	Rushing, Amy	NV	4/7/21
3371	Ruskin, Richard	WA	4/4/21
3372	Russell-Jayne, Bruce	IN	4/14/21
3373	Russell, Alan	NY	4/12/21
3374	RUSSELL, Darryl	KS	4/5/21
3375	Russell, Lisa	UT	4/4/21
3376	Russell, Marsha	CA	4/12/21
3377	Russell, Sherry	MD	4/5/21
3378	Russert, J	TX	4/3/21
3379	Russio, Theresa	OR	4/5/21
3380	Rustenbeck, Catherine	NV	4/6/21
3381	Rutherford, Jill	MA	4/7/21
3382	Ruttenberg, Melissa	AZ	4/2/21
3383	Ryan, Melanie	PA	4/5/21
3384	Ryan, Susan	CA	4/7/21
3385	Rzonca, Bonita	IN	4/10/21
3386	Sadler, Marcia	CO	4/1/21
3387	Saeks, Joel	OH	4/3/21
3388	Sailer, Randy	ND	4/5/21
3389	Salata, Gary	NJ	4/11/21
3390	Salazar, Wolfgang	TX	4/11/21
3391	Salm, Bonita	PA	4/8/21
3392	Salonimer-Horner, Hemdah	MO	4/3/21
3393	Salsman, Ruby	KY	4/3/21
3394	Salter, Susan	IN	4/11/21
3395	Sam, Paula	CA	4/7/21
3396	Sams, Barbara	PA	4/14/21
3397	Samsel, Taylor	TX	4/3/21
3398	Samson, Sherry	NJ	4/3/21

3399	Samuels, Mara	NJ	4/13/21
3400	San Miguel, Mary J	MD	4/12/21
3401	SanchezScocca, Ellen	VT	4/3/21
3402	Sandberg, Anne	IN	4/11/21
3403	Sandek, India	CA	4/13/21
3404	Sandell, Walter	NJ	4/6/21
3405	Sanders, Claire	MO	4/14/21
3406	Sanders, John	CA	4/2/21
3407	Sanders, Mary	FL	4/3/21
3408	Sanders, Thomas	CT	4/5/21
3409	Sanders, Thomas	CT	4/4/21
3410	Sanderson, Diana	ME	4/4/21
3411	Sandgren, Iris	MN	3/31/21
3412	Sands, Susan	TX	4/9/21
3413	Sands, Wendy	NY	4/5/21
3414	sanfilippo, Val	CA	4/9/21
3415	Sanquenetti, Sharon	IN	4/10/21
3416	Sanquenetti, Sharon	IN	4/3/21
3417	Santacroce, Anna	FL	4/8/21
3418	Santana, Kathryn	CA	4/9/21
3419	Saphier, Nancy	NJ	4/5/21
3420	Sapone, Diane	NY	4/13/21
3421	Sarsfield, Rebecca	PA	4/9/21
3422	Sattler, Lonn	NH	4/4/21
3423	Sauer, Leslie	NJ	4/7/21
3424	Saunders, Laura	TX	4/11/21
3425	savage, Keith	CT	4/7/21
3426	Saville, Jason	NY	4/1/21
3427	Scandiffio, Marguerite	NJ	4/5/21
3428	Scantlen, Gayle	MI	4/12/21
3429	SCARBOROUGH, LYNN	TN	4/6/21
3430	Scarlett, Sandi	WA	4/11/21
3431	Scarpita, Marco	CO	4/3/21
3432	Scerbo, Barbara	FL	4/8/21
3433	Schaefer, Catherine	IN	4/10/21
3434	Schafer, Laura	NJ	4/4/21
3435	Schalamon, Lorraine	NY	4/5/21
3436	Schalit, Bob	NY	4/11/21
3437	Schappell, Susan	PA	4/7/21

3438	Scheels, Rolland	MI	4/7/21
3439	Scheid, Allen	IL	4/3/21
3440	Schell, Michael	NY	4/5/21
3441	Schenck, Paul	OR	4/11/21
3442	Scherschel, Paula	IN	4/5/21
3443	Schicker, Robert	FL	4/2/21
3444	Schiff, Carol	NY	4/8/21
3445	Schildcrout, Nicole	MA	4/4/21
3446	Schilling, Pam	IL	4/7/21
3447	Schindler, Cathy	WI	4/4/21
3448	Schlager, Deena	TX	4/10/21
3449	Schlager, Mark	NJ	4/10/21
3450	Schlesser, Mary	CO	4/2/21
3451	Schlesser, Mollie	CO	4/9/21
3452	Schlie, Linda	CA	4/4/21
3453	Schmahl, Matthew	CA	4/4/21
3454	Schmearer, Terrie	NY	4/5/21
3455	Schmidt, Margo	AZ	4/6/21
3456	Schmidt, Virginia	NC	4/12/21
3457	Schmidtchen, Hedwig	DE	4/5/21
3458	Schmiedeke, Carl	CO	4/10/21
3459	Schmierer, Kyle	AZ	4/6/21
3460	Schmook, Brijit	CA	4/13/21
3461	Schnell, Robin	NH	4/7/21
3462	Schoenecker, Rhonda	CO	4/3/21
3463	schonberg, mart	AZ	4/7/21
3464	Schopac, Marie	RI	4/3/21
3465	Schredder, Stephanie	ME	4/1/21
3466	Schrier, Barbara	NY	4/7/21
3467	Schrock, Renata	CA	4/12/21
3468	Schroeder, Ruth	OH	4/8/21
3469	Schroeder, Ruth	OH	4/6/21
3470	Schueler, Darlene	TN	4/2/21
3471	Schuelke, Cheryl	WA	4/5/21
3472	Schulte, David	AZ	4/6/21
3473	Schultz, Deborah	PA	4/9/21
3474	Schulz, Kathryn	WI	4/10/21
3475	Schumacher, Pat	TX	4/2/21
3476	Schumann, Michael	IL	4/5/21

3477	Schwake, Deb	IA	4/8/21
3478	Schwartz, Chris	FL	4/8/21
3479	Schweigert, Linda	NY	4/8/21
3480	Schweinler, Bonnie	NJ	4/10/21
3481	Schwenzer, John	NY	4/3/21
3482	Scibetta, Kim	GA	4/3/21
3483	Scoggin, Mary	NC	4/4/21
3484	Scott, David	PA	4/6/21
3485	Scott, Doug	OH	4/12/21
3486	Scott, Laura	CA	4/10/21
3487	Scott, Margaret	MI	4/3/21
3488	Scott, Margaret	MT	4/11/21
3489	Scott, Walter	OH	4/4/21
3490	Scranton, Debra	IL	4/6/21
3491	scrima, lawrence	CO	4/5/21
3492	Scriptunas, Judy	PA	4/6/21
3493	Seagrave, Robin	OR	4/10/21
3494	Sears, Sherrie	KY	4/11/21
3495	Seccombe, Ann	CO	4/2/21
3496	Seccombe, Ann	CO	4/3/21
3497	Sechrist, Shelley	AZ	4/3/21
3498	Seckendorf, Michael	NY	4/5/21
3499	Secrist, Patricia	UT	4/3/21
3500	sedna, sedna	CA	4/13/21
3501	Seedorff, Terry	IA	4/6/21
3502	Seedorff, Terry	IA	4/7/21
3503	Seegott, Mary	OH	4/10/21
3504	Seel, Stacia	IN	4/6/21
3505	Segal, Linda	FL	4/3/21
3506	Segers, Jane	DE	4/3/21
3507	Seidenstein, Cathy	FL	4/14/21
3508	Seigal, Nancy	NY	4/3/21
3509	Sellick, Shawn	ME	4/5/21
3510	Sena, Linda	NM	4/4/21
3511	Serna, Nikki	NM	4/2/21
3512	Serrano, Paul	NE	4/8/21
3513	Serrao, Hilary	CO	4/8/21
3514	Serval, Evelyn	FL	4/3/21
3515	Sewell, Carol	CA	4/4/21

3516	Sewell, Sharon	TX	4/3/21
3517	Seymour, Christopher	MD	4/3/21
3518	Shackelford, Patricia	MA	4/8/21
3519	Shafer, Alison	NM	4/4/21
3520	Shah, Madhavi	TN	4/12/21
3521	Shainwald, Robert	NY	4/13/21
3522	Shanley, Karen	CO	4/5/21
3523	Shann, Kathy	FL	4/8/21
3524	Sharkey, Ellen	IL	4/6/21
3525	Sharland, Jim	MA	4/3/21
3526	Sharp, Eli	HI	4/13/21
3527	Shaw, Jaimie	UT	4/3/21
3528	Shay, Ralph	ID	4/3/21
3529	sheheen, diane	SC	4/4/21
3530	sheheen, virginia	SC	4/2/21
3531	Shekinah, Anita J	IA	4/8/21
3532	Shepard, Maria	FL	4/2/21
3533	Shephard, Linda	WA	4/1/21
3534	Shepherd, Gloria	MI	4/5/21
3535	Sheridan, Katherine	NM	4/4/21
3536	Sherman carney, Lisa	PA	4/8/21
3537	Sherman, Randi	RI	4/13/21
3538	sherman, sheila	NY	4/11/21
3539	Sherwood, Chuck	FL	4/3/21
3540	Sherwood, Staci	FL	4/6/21
3541	Shimp, Jan	VT	4/10/21
3542	Shinski, Debbie	UT	4/10/21
3543	Shipsky, Judith	NM	4/3/21
3544	Shirley, Myra	OK	4/3/21
3545	Shlimon, Charles	MA	4/12/21
3546	Shoberg, Lu	CA	4/7/21
3547	Shock, Emma	PA	4/4/21
3548	ShoemakerBeal, Roberta	TX	4/3/21
3549	Shohfi, Sharon	NC	4/4/21
3550	Shore, Patricia	WA	4/9/21
3551	Short, Birja	IN	4/10/21
3552	Shryock-Obrien, Catherine	KS	4/10/21
3553	Shubitz, Howard	TX	4/8/21
3554	Shugerman, Lance	FL	4/7/21

3555	shurtz, Alice	FL	4/3/21
3556	Shushan, Cheryl	MA	4/3/21
3557	Siano, Susan	TN	4/6/21
3558	Sickler, Mary	FL	4/3/21
3559	Sickles, Barbara	AZ	4/4/21
3560	Sidy, Richard	AZ	4/13/21
3561	Siebecke, Karen	OR	4/4/21
3562	Sieechio, Debbie	FL	4/3/21
3563	Sieg, Frank	MD	4/3/21
3564	Sievers, Michele	PA	4/3/21
3565	Sigalas, Patricia	NJ	4/7/21
3566	Signalness, Penny	OR	4/3/21
3567	Sillah, Julie	RI	4/7/21
3568	Silva, Mary Lou	AZ	4/4/21
3569	SILVERBERG, AMANDA	WA	4/11/21
3570	Silveri, Crystal	IL	4/10/21
3571	Simmons, Irene	CA	4/9/21
3572	Simmons, Tammy	FL	4/7/21
3573	Simon, Katherine	LA	4/8/21
3574	Simon, R	FL	4/4/21
3575	Simonson, Jackie	WI	4/6/21
3576	Simpson, Brenda	TN	4/11/21
3577	Simpson, Elisabeth	PA	4/7/21
3578	Simpson, Hazel	WV	4/8/21
3579	Simrak, Monica	MI	4/12/21
3580	sinclair-nixon, Pamela	WA	4/6/21
3581	Sing, Carol	NV	4/4/21
3582	Singer, Barbara	FL	4/13/21
3583	Singer, Nettie	OK	4/11/21
3584	Singer, Nettie	OK	4/14/21
3585	Singer, Terri	FL	4/7/21
3586	Singer, Tessa	NV	3/31/21
3587	Singh-Bowman, Nan	CA	4/6/21
3588	Singh, Jagdeep	NJ	3/31/21
3589	Singher, Marjory	MN	4/9/21
3590	Singleton, Gloria	NJ	4/10/21
3591	Siporin, Cordelia	NJ	4/13/21
3592	Sisson, Peggy	WV	4/6/21
3593	Sisson, Valerie	MI	4/6/21

3594	Sisson, Valerie	MI	4/4/21
3595	Sitter, Margaret	WI	4/4/21
3596	Skadberg Chavez, Barbara	CO	4/8/21
3597	Skandalis, Amalia	NY	4/12/21
3598	Skirving, Mary	TX	4/3/21
3599	Skirving, Mary	TX	4/2/21
3600	Skophammer, John	WI	4/13/21
3601	Skowronski, Audrey	PA	4/3/21
3602	Skyles, Karen	CA	4/6/21
3603	Slaminski, Cathi	CA	4/6/21
3604	slapinski, paul	CA	4/8/21
3605	Slauson, John	IL	4/12/21
3606	sledge, cornelia	AR	4/3/21
3607	sliwinski, marcia	NY	4/4/21
3608	Slone, Sheree	FL	4/11/21
3609	Slosek, Brian	NC	4/6/21
3610	Small, Craig	NY	4/3/21
3611	Small, Pamela	MT	4/10/21
3612	Smalls, Elizabeth	WV	4/10/21
3613	Smason, Marc	WA	4/11/21
3614	Smeltz, Janet	MA	4/12/21
3615	Smerling, Carol	FL	4/2/21
3616	Smith, Andrea	FL	4/6/21
3617	Smith, Arthur	NJ	4/3/21
3618	Smith, Cheri	KY	4/3/21
3619	Smith, Connie	KY	4/10/21
3620	smith, cynthia	FL	4/6/21
3621	Smith, Donald	NM	4/3/21
3622	Smith, Doug	VA	4/3/21
3623	Smith, Evelyn	NJ	4/3/21
3624	Smith, Frank	MA	4/11/21
3625	Smith, Franklin	OR	4/2/21
3626	Smith, Gabriele	NC	4/3/21
3627	Smith, Horace	TX	4/3/21
3628	Smith, Janell	IL	4/4/21
3629	Smith, Jason	WA	4/12/21
3630	Smith, Jessica	OR	4/7/21
3631	Smith, Julie	WA	4/9/21
3632	Smith, Kathy	AZ	4/6/21

3633	Smith, L	CA	4/4/21
3634	Smith, Leah	TN	4/3/21
3635	Smith, Louis	VA	4/1/21
3636	Smith, Maureen	AZ	4/6/21
3637	Smith, Michael	TX	4/5/21
3638	Smith, Michael W.	WA	4/8/21
3639	Smith, Peter	WA	4/4/21
3640	Smith, Ronald	CA	4/5/21
3641	smith, sandee	NC	4/5/21
3642	Smith, Sarah	IN	4/11/21
3643	Smith, Thomas	CA	4/3/21
3644	Smith, Tom	CA	4/3/21
3645	Smith, William	FL	4/4/21
3646	Smoke, ROBERTA	KS	4/3/21
3647	Smoker, Art	NC	4/2/21
3648	Snedeker, Henry	IL	4/3/21
3649	Snudden, Anne	MI	4/2/21
3650	Snuggs, Elizabeth	MI	4/8/21
3651	Snyder, Anne	SC	4/12/21
3652	Snyder, Deirdre	CA	4/12/21
3653	Snyder, Lynn	NY	4/7/21
3654	Sobel, Leslie	MI	4/12/21
3655	Sobol, Patricia	MI	4/4/21
3656	Solanki, Sundhya	CO	4/3/21
3657	Soldner, Stephanie	CO	4/13/21
3658	Somers, Susan	MN	4/14/21
3659	Somma, Joseph	NY	4/12/21
3660	Sonnemann, MaryAnn	WI	4/5/21
3661	Sookne, Jennifer	CA	4/7/21
3662	Sopher, Jack	FL	4/3/21
3663	Sorensen, Elaine	IN	4/3/21
3664	Sorensen, Sally	RI	4/3/21
3665	Sorenson, Dru	AK	4/5/21
3666	Soriero, Geri	PA	4/4/21
3667	Sorlie, Lois	CO	4/8/21
3668	Sorlie, Lois	CO	4/10/21
3669	Sosin-Rocha, Madeleine	WA	4/4/21
3670	Sosin, Madeleine	WA	4/9/21
3671	Soto, Elsa M.	TX	4/3/21

3672	Soule, Mary	VA	4/6/21
3673	Southard, Glenn	TN	4/3/21
3674	Sovero, Brenda	OH	4/4/21
3675	Spandau, Sharyll	AZ	4/3/21
3676	Spangler, Diane	TX	4/7/21
3677	Spanitz, John	PA	4/12/21
3678	speck, caryl	FL	4/12/21
3679	Speer, Rich	PA	4/13/21
3680	Spehar, Karen	OH	4/10/21
3681	Spehar, Karen	OH	4/3/21
3682	Speicher, Denise	NY	4/13/21
3683	Spence, Carma	CA	4/2/21
3684	Spencer, Carolyn	NV	4/10/21
3685	Spencer, Martin	WA	4/3/21
3686	Spengler, Reginald	FL	4/4/21
3687	Speranza, Ilya	NY	4/6/21
3688	spivey, janice	KS	4/3/21
3689	Spleas, Vicki	WI	4/5/21
3690	spoon, leslie	CA	4/5/21
3691	Sportsman, Janice	IA	4/5/21
3692	Sposato, Janis	NJ	4/9/21
3693	Sprague, Johnathen	NY	4/6/21
3694	Sprague, Lois	IN	4/6/21
3695	Sprince, Barry	FL	4/4/21
3696	Springer, Aleta	WA	4/3/21
3697	Sprouse, Sharon	CA	4/5/21
3698	Squyres, George	TX	4/13/21
3699	Sroka, John	PA	4/8/21
3700	St, Susan	NJ	4/4/21
3701	Stafford, Sandy	OR	4/11/21
3702	Staffulani, Linda	MI	4/3/21
3703	Stancoff, Patricia	TX	4/3/21
3704	Stanford, Halal	TX	4/6/21
3705	Stanistreet, Mary	CA	4/4/21
3706	Stanleta, Freddie	SD	4/10/21
3707	Stansfield, Jack	WA	4/4/21
3708	Staples, Laura Staples	FL	4/6/21
3709	Star, Garry	CA	4/5/21
3710	Stark, Diane	NY	4/5/21

3711	stark, Mary	NY	4/9/21
3712	Stark, Robert	CA	4/2/21
3713	Staron, Maryann	IL	4/9/21
3714	Starr, David	HI	4/12/21
3715	Starr, Xander	NM	4/6/21
3716	Stavinoha, Anna	WA	4/2/21
3717	Stec, Paula	MI	4/4/21
3718	Steele, Brenda	AR	4/13/21
3719	Steele, Ed	KS	4/5/21
3720	Steele, Karen	VT	4/5/21
3721	Steimann, Frederick	MN	4/4/21
3722	Stein, Anna	MA	4/2/21
3723	Stein, Anna	MA	4/7/21
3724	Stein, Elizabeth	OR	4/2/21
3725	Stein, M.	AZ	4/14/21
3726	Steinberg, Angela	NY	4/10/21
3727	Steiner, Sherry	FL	4/3/21
3728	Steinert-Bresilge, Heidi	IL	4/9/21
3729	Steinmayer, William	CT	4/5/21
3730	Stenger, Shelley	MI	4/14/21
3731	Stephan, Phillip	MA	4/7/21
3732	Stephens, Sadie	FL	4/3/21
3733	Stephenson, Vickie	MO	4/11/21
3734	Stern, Jared W.	MA	4/3/21
3735	Stevenson, Jan	OK	4/2/21
3736	Stewart, Gretchen	CO	4/5/21
3737	Stewart, Jeanette	IL	4/7/21
3738	Stewart, Jennifer	CO	4/3/21
3739	Stewart, Jim	IA	4/6/21
3740	Stewart, Jon	MA	4/11/21
3741	Stewart, L	KS	4/4/21
3742	Stewart, Michael	MO	4/7/21
3743	Stick, Linda	NJ	4/8/21
3744	Stickney, Dana	MA	4/8/21
3745	Stiegmann, Mackenzie	FL	4/7/21
3746	Stillings, Deanna	MA	4/9/21
3747	Stills, Zack	CA	4/2/21
3748	Stjepanovic, Jennifer	OR	4/10/21
3749	StMary, Jeffrey	MS	4/11/21

3750	Stoba, Cathy	IL	4/3/21
3751	Stockdale, Ann	WA	4/13/21
3752	Stoecklein, Kim	FL	4/14/21
3753	Stoecklein, Kimberley	FL	4/12/21
3754	Stoffel, Sandra	OR	4/7/21
3755	Stolar, ArieH	WA	4/3/21
3756	Stone-Meyer, Virginia	MO	4/6/21
3757	Stone, Brenda	MN	4/14/21
3758	Stone, Charles	CO	4/1/21
3759	Stone, Jeff	OH	4/13/21
3760	Stone, Patricia Owens	CO	4/14/21
3761	Stoneback, Sharon	NJ	4/10/21
3762	Stoner, Cynthia	IL	4/3/21
3763	Stonum, Cynthia	MO	4/12/21
3764	Stooks, Marilyn	AZ	4/2/21
3765	Stowe, Patrick	WA	4/7/21
3766	Strand, Milaka	WA	4/3/21
3767	strausbaugh, lusy	MD	4/11/21
3768	Strong, Grace	MI	4/3/21
3769	Stroud, Margie	TX	4/3/21
3770	Struble, Carla	WI	4/6/21
3771	Struble, Dianne	NJ	4/12/21
3772	Stucky, Jyoti	DC	4/1/21
3773	Stucky, Jyoti	DC	4/1/21
3774	Studenroth, Karl	AR	4/3/21
3775	Stumpf, Michael	VA	4/11/21
3776	Styles, Ariel	IL	4/7/21
3777	Sullivan, Ann	NY	4/4/21
3778	Sullivan, Mike	MA	4/13/21
3779	Summers, Susan	TX	4/9/21
3780	Summers, Susan	TX	4/6/21
3781	Susnik, Robert	KS	4/3/21
3782	Suso, Alicia	NY	4/3/21
3783	Suso, Alicia	NY	4/8/21
3784	Sustare, Caroline	VA	4/12/21
3785	Svendsen, Julie	CA	4/8/21
3786	Svensson, Steve	IL	4/4/21
3787	Svensson, Steve	IL	4/5/21
3788	Swain, Michael	CO	4/3/21

3789	Swann, Lily	OR	4/5/21
3790	Swanson, Karen	WI	4/5/21
3791	Sweeney, Judy	NM	4/5/21
3792	Sweitzer, William	PA	4/13/21
3793	Swetland, Ed	DE	4/2/21
3794	Swift, Richard	CA	4/3/21
3795	Swindell, Lillian	NC	4/5/21
3796	Swoboda, Tammy	IN	4/3/21
3797	Symonds, Deb	IA	4/7/21
3798	Szabo, Kathleen	CA	4/6/21
3799	Szambelak, Sue	NJ	4/3/21
3800	szvoboda, gabor	IL	4/4/21
3801	Tack, Martha	AL	4/7/21
3802	Tait, Alese	CT	4/12/21
3803	Talbert, Michael	AR	4/3/21
3804	Talbot, Lori	NJ	4/7/21
3805	Talley, Judy	NV	4/6/21
3806	Tangney, John	OR	4/9/21
3807	Tanner, Nancy	RI	4/13/21
3808	Tanner, Rema	TN	4/4/21
3809	Tarallo, Christi	MA	4/5/21
3810	Tartaglia, Diane	FL	4/6/21
3811	Tatum, Ira	TN	4/4/21
3812	Tauber, Sherry	MD	4/4/21
3813	Taylor, Carla	OR	4/5/21
3814	Taylor, Crystal	IN	4/11/21
3815	Taylor, Darlene	WV	4/7/21
3816	Taylor, Elizabeth	WA	4/8/21
3817	Taylor, Jane	MA	4/4/21
3818	Taylor, Jennifer	OK	4/4/21
3819	Taylor, Rebecca	IN	4/6/21
3820	Taylor, Sandra	TX	4/6/21
3821	Tchelka, Annette	CT	4/2/21
3822	Teller, Jeff	TX	4/14/21
3823	tellerday, crystle	CT	4/10/21
3824	Temple, Edward and Gail	NY	4/7/21
3825	Temple, Sharon	OH	4/3/21
3826	Templeton, Helen	IN	4/13/21
3827	Ten Eyck, Kim	CO	4/5/21

3828	Terlazzo, John	PA	4/9/21
3829	Testin, Julia	IL	4/4/21
3830	Thakis, Phyllis	NM	4/6/21
3831	THANDI, HANNAH	AZ	4/10/21
3832	Thane, Nancy	KS	4/12/21
3833	Thayer, Russ	MT	4/10/21
3834	Theerman, Laura	MO	4/5/21
3835	Thero, Debbie	MI	4/3/21
3836	Thibodeau, Faith	ME	4/6/21
3837	Thiele, Sheila	MS	4/2/21
3838	Thiemann, Eva	OR	4/8/21
3839	Thinnes, Bill	IA	4/14/21
3840	Thom, Brittany	WI	4/11/21
3841	Thomas, Carrie	CA	4/4/21
3842	Thomas, Chuck	FL	4/3/21
3843	Thomas, Craig	CO	4/7/21
3844	Thomas, Jacqueline	IL	4/10/21
3845	Thomas, Jamie	FL	4/10/21
3846	Thomas, Jamie	FL	4/13/21
3847	Thomas, Karlene T	DC	4/8/21
3848	Thomas, Linda Garrish	NH	4/3/21
3849	Thompson lol, Kay	NE	4/8/21
3850	Thompson, Camille	NC	4/5/21
3851	thompson, carol	WA	4/2/21
3852	Thompson, Deborah	WV	4/11/21
3853	Thompson, RC	AL	4/9/21
3854	Thompson, Rick	UT	4/3/21
3855	Thorne, Jane	OK	3/31/21
3856	Thorne, Joan	NJ	4/6/21
3857	Thorstensen, Maureen	WA	4/13/21
3858	Thrasher, Carla	OK	4/3/21
3859	Thrasher, DorisMarie	WI	4/12/21
3860	thurman, john	OR	4/8/21
3861	thurman, susan	OR	4/8/21
3862	Tice, Laurel	CA	4/9/21
3863	TIETZ, CARRIE	NY	4/11/21
3864	Tilghman, Terrie	PA	4/13/21
3865	tillery, linda	CA	4/9/21
3866	Tilley, Emily	OH	3/31/21

3867	Timmer, Bailey	OH	4/1/21
3868	Tinch, John	TN	4/12/21
3869	Tingblad, Richard	MA	4/5/21
3870	Tinsley, Rita	TN	4/2/21
3871	tippens, r	MA	4/9/21
3872	tippens, Rebecca	MA	4/4/21
3873	tippett, joseph	NC	4/5/21
3874	Tipton, Bruce	WA	4/6/21
3875	Tirey, Heather	NV	3/31/21
3876	Tisch, Zuly	OH	4/4/21
3877	Toadvyn, Bonnie	NJ	4/14/21
3878	Tobias, Kimberly	KY	4/10/21
3879	Tocci, Carmine	MA	4/5/21
3880	Todd, Becky	FL	4/10/21
3881	Todd, Rhonda	TX	4/5/21
3882	Todd, Susan	MO	4/7/21
3883	Todhunter, Janis	NM	4/6/21
3884	Toelle, Sherry	IA	4/13/21
3885	Tollinger, Cindy	OH	4/3/21
3886	Tomaselli, susan	NY	4/6/21
3887	Tomek, Jamie	MO	4/3/21
3888	Tomson, Robert	WI	4/13/21
3889	Tomusiak, Carol	CT	4/13/21
3890	Torosian, Helen	VA	4/3/21
3891	Torpey, Ellen	OR	4/4/21
3892	Torrey Palermo, Lorna	OR	4/13/21
3893	Torson, Di	SD	4/10/21
3894	Tosh, Jean	PA	4/13/21
3895	Tostenson, Kimberly	MN	4/3/21
3896	Tostie, Branden	CA	4/6/21
3897	Townill, Linda	IL	4/9/21
3898	Tranquillo, Ruth	NH	4/5/21
3899	Trask, Tim	AZ	4/5/21
3900	Traughber, Bonny	TN	4/4/21
3901	Travers, L.j	FL	4/2/21
3902	Treece, Christina	AR	4/12/21
3903	Trescone, Thomas	WA	4/3/21
3904	Tresvik, Germaine	NY	4/2/21
3905	Treto, Manuel	KS	4/10/21

3906	Triggs, Lise	TN	4/5/21
3907	Triplett, Bruce and Penny	VA	4/4/21
3908	Tripp, Katherine	NC	4/10/21
3909	Trippe, Marilyn	SC	4/6/21
3910	Trowbridge, Justine	MI	4/5/21
3911	Truell, Michele	NV	4/11/21
3912	Trytten, Janice	OH	4/5/21
3913	Tsiamis, Eleni	VA	4/11/21
3914	Tufte, Carol	CA	4/2/21
3915	Tuncay, Sencer	WI	4/3/21
3916	Tuomisto, Randy	RI	4/4/21
3917	Turano, Michael	NJ	4/5/21
3918	Turco, Jill	PA	4/9/21
3919	Turner, Cheryl	FL	4/2/21
3920	Turner, Jeffrey	MA	4/5/21
3921	Turner, Kelly	NV	4/10/21
3922	Turner, Kristina	NM	4/9/21
3923	Turner, Lisa	WI	4/13/21
3924	Turner, Stephanie	FL	3/30/21
3925	Tuttle, Tim	NY	4/10/21
3926	Twait, Rini	CO	4/14/21
3927	Tym, Alice	TN	4/11/21
3928	Tyree, Sylvia	KY	4/3/21
3929	Udell, Nancy	NY	4/8/21
3930	Ulvaeus, Linda	CA	4/13/21
3931	Underwood, Dennis	WA	4/3/21
3932	Unruh, Julie	KS	4/13/21
3933	urbanski, Bob	NC	4/7/21
3934	Uriarte, Ray	CA	4/3/21
3935	Urquhart-Myers, Thomas	FL	4/6/21
3936	Usher, Kristin	FL	4/6/21
3937	Utan, Kathryn	VA	4/5/21
3938	Utz, Glenna	MO	4/5/21
3939	Vaccaro, Terry	NJ	4/7/21
3940	Vaccaro, Terry	NJ	4/9/21
3941	vagvala, Balakrishna	CO	4/1/21
3942	Vairo, Pasquale	CT	4/3/21
3943	Valandra, Thomas	SD	4/4/21
3944	Valastro, Cecile	OR	4/7/21

3945	Valencia, Suzanne	FL	4/10/21
3946	Vallero, Daniel	AZ	4/11/21
3947	Valone, Dorothy	FL	4/4/21
3948	VanAssche, Terese	WA	4/9/21
3949	VanderBeek, Gerry	CO	4/2/21
3950	VanderHoeven, Nakisha	CA	4/3/21
3951	VanderWall, H J	FL	4/3/21
3952	VanDerzee, Susan	CT	4/9/21
3953	VanDurmen, Shirley	CA	4/3/21
3954	Vanecek, Rhonda	NV	4/13/21
3955	VanEtten, Margot	NY	4/3/21
3956	Vannoy, Alan	NE	4/3/21
3957	VanTassel, Donna	CO	4/5/21
3958	Vanya, Rene	TX	4/5/21
3959	Varhol, Barbara	KS	4/3/21
3960	Varin, Lynn	VT	4/3/21
3961	Varin, Lynn	VT	4/7/21
3962	Varnell, Micky	PA	4/13/21
3963	Varner, Nancy	MD	4/3/21
3964	Varnum, Jane	NH	4/6/21
3965	Vars, Sandra	CA	4/2/21
3966	Vasey, Joan	AZ	4/6/21
3967	Vasquez, Mary	CA	4/12/21
3968	Vassallo, June	NY	4/3/21
3969	Vaughan, Stephen	AZ	4/9/21
3970	Vautrain, Adele	MA	4/3/21
3971	Vazquez, Ivette	NY	4/7/21
3972	Veatch, Debi	OR	4/9/21
3973	Vennerbeck, Clarissa	AR	3/30/21
3974	Venskowski, V	MA	4/3/21
3975	Verdin, Christine	MD	4/11/21
3976	Vergara, Violet	FL	4/11/21
3977	Vesper, Rita	WA	4/12/21
3978	Vezzetti, Elena	NJ	4/9/21
3979	Vieira, Jane	MA	4/10/21
3980	Vilchinsky, Keri	NC	4/9/21
3981	villalon, wesly	CA	4/9/21
3982	Villamizar, Herman	NY	4/3/21
3983	Villanueva, Charles	MO	4/10/21

3984	Villarreal, Jan	IL	4/5/21
3985	Villarreal, Ronald	TX	4/7/21
3986	Villeneuve, Michele	TN	4/4/21
3987	Villodas, Abigail	AZ	4/2/21
3988	Villodas, Abigail	AZ	4/4/21
3989	vineski, patricia	NY	4/4/21
3990	viney, james	UT	4/3/21
3991	Vineyard, Kayla	MI	4/7/21
3992	Vineyard, Logan	IN	4/7/21
3993	Vinson, Jean	OR	4/10/21
3994	Virbickas, Allee	NJ	4/5/21
3995	Vogt, Judy	IL	4/3/21
3996	Vogt, Kathleen	MI	4/4/21
3997	volkmann, Heiko	TN	4/4/21
3998	Vomund, Karin	IL	4/10/21
3999	von Fleckenstein, Fritz	DC	4/10/21
4000	von Mazo, Gabrielle	NM	4/13/21
4001	VonBraun-Bond, Isaiah	AZ	4/14/21
4002	Vos, Noah	NC	4/10/21
4003	Vos, Walter	OR	4/3/21
4004	Vos, Walter	OR	4/6/21
4005	Vrancart, Charlotte	NJ	4/3/21
4006	Vrzal, Phyllis	MN	4/13/21
4007	Vukelic, Karrie	IL	4/12/21
4008	Waczkowski, Connie	NY	4/3/21
4009	Wade, Michelle	TN	3/31/21
4010	wadsworth, melissa	WA	4/8/21
4011	Waggoner, Robert	WA	4/10/21
4012	Wagner, Joanna	CA	4/5/21
4013	Wagner, Kimberly	CO	4/4/21
4014	Waite, Betty	NY	4/3/21
4015	Waite, Cindy	CO	4/7/21
4016	Wakefield, Sharon	IL	4/3/21
4017	Walano, Evelyn	IL	4/3/21
4018	Walden, Don	NJ	4/7/21
4019	Walden, Monica	TX	4/5/21
4020	Walker, Annette	AZ	4/6/21
4021	Walker, Billie	AR	4/9/21
4022	Walker, Brian	CT	4/2/21

4023	Walker, Eleanor	CA	4/8/21
4024	Walker, Jackie	MI	4/2/21
4025	Walker, Kathy	MO	4/8/21
4026	Walker, Lauren	KS	4/4/21
4027	Walker, Sandra	NJ	4/11/21
4028	Walker, Sara	SC	4/9/21
4029	Walker, Sara	SC	4/7/21
4030	Walkowski, Jill	OH	4/11/21
4031	Wall, Alexander	MN	4/10/21
4032	wall, beverly	IN	4/10/21
4033	Wallace, Guy	NY	4/14/21
4034	Wallace, Michele	CA	4/5/21
4035	Wallace, Richard	MI	4/10/21
4036	Wallace, Sarah m	CA	4/3/21
4037	Wallace, Terese	CO	3/31/21
4038	Wallon Haynes, Linda	OR	4/5/21
4039	Walser, Timothy	OK	4/5/21
4040	Walsh, John	FL	4/4/21
4041	Walsh, Laural	NY	4/4/21
4042	Walsh, Laural	NY	4/13/21
4043	Walsh, Mary Ann	VA	4/10/21
4044	Walsh, Michael	CA	4/3/21
4045	Walsh, PAtricia	UT	4/12/21
4046	Walsh, Susan	OR	4/11/21
4047	Walstrum, Joseph	MD	4/9/21
4048	Walter, Crystal	KS	4/3/21
4049	Walters, Carol	GA	4/13/21
4050	Walters, Joanne	OR	4/13/21
4051	WALTMAN, Hilde	FL	4/13/21
4052	WALTMAN, Karen	FL	4/11/21
4053	Wander, Brenda	FL	4/13/21
4054	Ward, Mary	OH	4/13/21
4055	Wardell, Tom	PA	4/3/21
4056	Warlick, Cindy	NC	4/3/21
4057	Warman-Szvoboda, Gaerin	IL	4/4/21
4058	Warren, Anna	GA	4/5/21
4059	Warren, Sabrina	WA	4/12/21
4060	Washburn, Patsy	UT	4/6/21
4061	Wasser, Patricia	MN	4/8/21

4062	Watabe, Rosemary	AK	4/7/21
4063	Waterman, Glenna	MA	4/2/21
4064	Watkins, Ryan	PA	4/7/21
4065	Watkins, Ryan	PA	4/14/21
4066	Watrous, Georgia	MA	4/4/21
4067	Watson, Cheryl	TX	4/5/21
4068	watson, Chris	SC	4/7/21
4069	Watters, Linda	FL	4/5/21
4070	Watts, Barbara	KY	4/14/21
4071	Watts, Elizabeth	DE	4/5/21
4072	Watts, George	GA	4/6/21
4073	Wayand, Gina	NY	4/14/21
4074	Weaver, Debra	MO	4/3/21
4075	Weaver, Matt	OH	4/12/21
4076	Weaver, Robert	GA	4/4/21
4077	Webb, Alex	MA	4/6/21
4078	Webber, Lee	FL	4/9/21
4079	WEBER-SLEDGE, HELGA	AL	4/6/21
4080	Weber, Peggy	VA	4/3/21
4081	Webster, Sandy	IL	4/3/21
4082	Weeks, Lynn	KS	4/10/21
4083	Ween, Bee	CA	4/3/21
4084	Weesner, Katherine	MN	4/3/21
4085	Wehling, Bruce	MN	4/14/21
4086	Weidner, Beth	GA	4/13/21
4087	Weinelt, Peter	AZ	4/2/21
4088	weinstein, steven	MA	4/3/21
4089	Weir, Deanna	NE	4/3/21
4090	Weisbecker, Ellen	NC	4/6/21
4091	Weiss, Steve	CA	4/9/21
4092	Welch, Elizabeth	AZ	4/8/21
4093	Welch, Ginny	TX	4/3/21
4094	Welch, Kathleen	NV	4/3/21
4095	Welch, Loralie	WA	4/10/21
4096	Welch, Susan	IL	4/13/21
4097	Welch, Timothy	IL	4/5/21
4098	Welker, Pam	NC	4/9/21
4099	Wells, Jayne	NJ	4/14/21
4100	Wells, Susan	UT	4/4/21

4101	Wells, Terri	NY	4/13/21
4102	welsch, vickie	MO	4/8/21
4103	Welsford, Susan	MI	4/3/21
4104	Welsh, Barbara	MO	4/6/21
4105	Welsh, Sarah	MI	4/7/21
4106	Wemhoff, Gregory	WA	4/3/21
4107	Wenckus, Patricia	OH	4/13/21
4108	Wende, Paula	OR	4/2/21
4109	Wendtland, Mary	WI	4/4/21
4110	Wendtland, Mary	WI	4/10/21
4111	Wennemark, Cynthia	TN	4/4/21
4112	Wenzel, Joseph	MN	4/3/21
4113	Wermuth, Lorraine	FL	4/5/21
4114	Werner, Jackie	FL	4/7/21
4115	Werner, Pat	NY	4/14/21
4116	Werner, Sharon	ME	4/4/21
4117	Wesche, Karen	TX	4/12/21
4118	Whaley, Barbara	FL	4/5/21
4119	Wheadon, Susan	MI	4/5/21
4120	Wheaton, Gary	CA	4/6/21
4121	Wheaton, Leslie G.	OR	4/9/21
4122	Wheaton, Merrijo	OR	4/9/21
4123	Wheeler, Ken	OR	4/4/21
4124	Whigham, Charles	VA	4/3/21
4125	Whitcher, Don	AZ	4/7/21
4126	White, Claudia	FL	4/5/21
4127	White, Debbie S	NM	4/11/21
4128	White, Jane	FL	4/11/21
4129	White, Jane	FL	4/4/21
4130	White, Lavenna	MN	4/14/21
4131	white, Leslie	TX	4/3/21
4132	White, Sandra	OH	4/2/21
4133	White, Sylvia	WA	4/5/21
4134	White, W Reid	NC	4/3/21
4135	Whitehair, Dianne	TX	4/12/21
4136	Whitehead, Arden	IL	4/1/21
4137	Whiteman, Donna	TX	4/4/21
4138	Whiting, Cynthia	NY	4/6/21
4139	Whitman, Ronni	NC	4/3/21

4140	Whitney, Judy	NM	4/7/21
4141	Whitton DVM, Doris	TN	4/13/21
4142	Wiechmann, Mark	NM	4/1/21
4143	Wiegand, Beverly	WA	4/7/21
4144	Wieland, Jeff	OR	4/6/21
4145	Wiggin, Deborah	NH	4/11/21
4146	Wiktor, Lisa	PA	4/10/21
4147	Wilcox, Bruce	CA	4/6/21
4148	Wilder, Diane	MA	4/11/21
4149	Wilder, Janis	ME	4/3/21
4150	Wildner, Andrea	FL	4/11/21
4151	Wilken, Jane	NM	4/10/21
4152	Wilkening, Karen	CA	4/8/21
4153	Wilkin, Sue	AZ	4/3/21
4154	Wilkin, Sue	AZ	4/3/21
4155	Wilkinson, Allison	MD	4/8/21
4156	Wilkinson, Colleen	PA	4/12/21
4157	Will, Diane	PA	4/2/21
4158	Will, Randy	CO	4/5/21
4159	Willhite, Duane	IA	4/9/21
4160	Williams, Alva	CA	4/8/21
4161	Williams, Catherine	MA	4/3/21
4162	Williams, Debbie	CA	4/3/21
4163	Williams, Deborah	KY	4/12/21
4164	Williams, Elaine	NY	4/11/21
4165	Williams, Heather	DE	4/3/21
4166	Williams, Mary	AZ	4/7/21
4167	Williams, Mary	AZ	4/14/21
4168	Williams, Patricia	NY	4/10/21
4169	Williams, Robert	MI	4/3/21
4170	Williams, Roger	TX	4/7/21
4171	Williams, Sherry	NC	4/5/21
4172	Williams, Todd	MD	4/14/21
4173	Williamslindgren, Suanne	ME	4/5/21
4174	Williamson, Cynthia	TX	4/8/21
4175	WILLIAMSON, DIRK	NJ	4/3/21
4176	Williamson, Joan	NY	4/13/21
4177	Williamson, Karen	OH	4/8/21
4178	Williamson, Maria	TX	4/13/21

4179	Willinger, Carol	SC	4/3/21
4180	Willingham, DeAnne	MT	4/9/21
4181	Willis, Nancy	OR	4/4/21
4182	willis, suesan	MN	4/7/21
4183	Wills, Patricia	WA	4/6/21
4184	Wills, Robert Wills	PA	4/6/21
4185	Wilmoth, Carole	TX	4/3/21
4186	Wilson, Daryl	FL	4/3/21
4187	Wilson, Dave	CA	4/9/21
4188	Wilson, David	AR	4/5/21
4189	Wilson, Debra	OK	4/4/21
4190	Wilson, Doug	ME	4/9/21
4191	Wilson, Ken	CA	4/2/21
4192	Wilson, Pat	IL	4/9/21
4193	Wilson, Patricia A	VA	4/4/21
4194	Wilson, Vicki	CO	4/4/21
4195	Wingerd, Mala	CA	4/11/21
4196	Winkler, Dana	NY	4/13/21
4197	WinterRose, Edward	NC	4/12/21
4198	Winters, Felisha	NY	4/3/21
4199	Wiorek, Catherine	IL	4/9/21
4200	Wiot, Gail	IL	4/6/21
4201	Wirth, Carol	FL	4/8/21
4202	Wise, Cherrie	CA	4/11/21
4203	Wise, Joseph	MS	4/4/21
4204	Wiseman, Linda	OR	4/2/21
4205	Wishnak, Len	SC	4/3/21
4206	Witt, Antonia	WA	4/4/21
4207	Wittersheim, Barbara	MI	4/6/21
4208	wolf, john	IA	4/4/21
4209	Wolf, Martha	CO	4/12/21
4210	Wolf, Rohana	IL	4/11/21
4211	Wolfe, Edward	WA	4/5/21
4212	Wollman-Simson, Andrew	WA	4/7/21
4213	Wollner, William	CA	4/9/21
4214	wolph, william	OH	4/9/21
4215	Wonder, Andrea	IA	4/4/21
4216	Wong, Patricia	OR	4/6/21
4217	Wood, Angela	WA	4/9/21

4218	Wood, Barbara	FL	4/9/21
4219	wood, ernest	OR	4/9/21
4220	Wood, Kristine	OR	4/3/21
4221	Wood, Megan	NY	4/3/21
4222	Wood, Michael	MA	4/4/21
4223	Wood, Mike	IN	4/13/21
4224	Woods, Amy	SD	4/7/21
4225	Woods, Laura	AZ	4/3/21
4226	Woods, Stephen	NY	4/5/21
4227	Woodward, Peggy	CO	4/3/21
4228	Wooldridge, Nicole	WA	4/10/21
4229	Woolridge, Virginia	MD	4/9/21
4230	Wormley, Terry	OR	4/2/21
4231	Wright Kaiser, Kay	IN	4/7/21
4232	Wright, Bruce	OR	4/4/21
4233	Wright, Cathy	WA	4/6/21
4234	Wright, Glenda	KY	4/4/21
4235	Wright, Liesl	KS	4/12/21
4236	Wright, Lorraine	ID	4/12/21
4237	Wright, Pamela	IN	4/5/21
4238	Wurts, Teresa	KY	4/5/21
4239	Wurzel, Laura	NC	4/5/21
4240	Wyckoff, Linda	PA	4/7/21
4241	Wyllie, Mary Ann	MI	4/12/21
4242	Wyman, Joe	TX	4/2/21
4243	Yaccino, Frank	PA	4/7/21
4244	Yachinich, Thomas	TX	4/3/21
4245	Yano, Sara	NY	4/5/21
4246	Yates, Grant	CO	4/10/21
4247	Yavorsky, Donna	NJ	4/5/21
4248	Yavorsky, Donna	NJ	4/3/21
4249	Ybarbo, Terri	TX	4/5/21
4250	Yench, Darice	WI	4/4/21
4251	Yermak, Iris Patty	DE	4/4/21
4252	Yingling, Audrey	MI	4/3/21
4253	yoho, angelica	MN	4/9/21
4254	Yontz, Mary	NC	4/7/21
4255	Young, Ben	IA	4/13/21
4256	YOUNG, CECILIA	IL	4/11/21

4257	Young, Denise	CO	4/13/21
4258	Young, James	KS	4/3/21
4259	Young, Joslynne	HI	4/6/21
4260	Young, Julia	TX	4/3/21
4261	Young, Marcella	MO	4/3/21
4262	Young, Margaret	CA	4/9/21
4263	Young, Shari	TX	4/9/21
4264	Young, Shawn	KS	4/3/21
4265	Young, Tom	OK	4/5/21
4266	Youngbullbear, Joel	SD	4/10/21
4267	Youtz, Charles	PA	4/3/21
4268	Zacks, Cindy	CA	4/2/21
4269	Zaharioudakis, Elizabeth	FL	4/3/21
4270	Zajac, Andrea	MI	4/4/21
4271	Zalesak, Margie	NC	4/5/21
4272	Zaninelli, Dolores	FL	4/4/21
4273	Zastrow, Sandra	MO	4/4/21
4274	Zavah, Rev. Barry Abraham	TX	4/6/21
4275	Zelasko, Sandy	CA	4/8/21
4276	Zeltner-Reitz, Lisa	NM	4/6/21
4277	Zettel, Thelma	WI	4/3/21
4278	Zezenia, sandy	ME	4/6/21
4279	Zickefoose, Debi	AZ	4/7/21
4280	Zielinski, Andrea	IL	4/4/21
4281	Ziese, Marci	MD	4/13/21
4282	Zinn, Andrea	NY	4/9/21
4283	Zisman, Michael	MI	4/5/21
4284	Zollicoffer, Candice	FL	4/9/21
4285	Zuckerman, Arlene	NY	4/11/21
4286	Zuleger, Eric	IN	4/12/21
4287	Zuniga, Abraham	TX	4/5/21
4288	Zwick, Elka	FL	4/9/21
4289	Zwicker, Marie Louise Morandi	ME	4/8/21
4290	Zy, Connie	FL	4/13/21

From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: FW: [EXTERNAL] Recommendations on the Interior Department's review of the federal onshore oil and gas program
Date: Thursday, April 15, 2021 9:28:05 AM
Attachments: [ECT sign-on letter FINAL.pdf](#)

This one went in the main email address but figured I'd flag because it's organized with high points!

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Alex Daue <alex_daue@twos.org>
Sent: Wednesday, April 14, 2021 12:15 PM
To: Energy Review <energyreview@ios.doi.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Alonso, Shantha R <shantha_alonso@ios.doi.gov>; Kelly, Katherine P <Kate_Kelly@ios.doi.gov>
Subject: [EXTERNAL] Recommendations on the Interior Department's review of the federal onshore oil and gas program

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Hello,

Please accept the attached comment letter on behalf of the organizations signed on to it. We appreciate the opportunity to comment.

Sincerely,

Alex Daue (he/him/his)
Assistant Director, Energy & Climate
The Wilderness Society | The Wilderness Society Action Fund
ph 720-647-9369
1660 Wynkoop St # 1150, Denver, CO 80202

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April 15, 2021

SUBMITTED VIA E-MAIL: energyreview@ios.doi.gov

The Honorable Deb Haaland
Secretary of the Interior
1849 C Street
Washington, D.C. 20240

Dear Secretary Haaland:

Thank you for the opportunity to provide recommendations on the Interior Department's review of the federal onshore oil and gas program. We wholeheartedly support this review, as the onshore program requires sweeping, top-to-bottom reform – to eliminate an entrenched, institutional preference for development, to elevate the role of conservation and other uses, and to create a more sustainable and predictable revenue stream for American taxpayers. Further, over the years, the Government Accountability Office, the Department of the Interior's Inspector General, and many others have repeatedly called-on the Interior Department (DOI) to undertake fundamental reforms to the onshore program.

At the outset, we wanted to encourage DOI to proceed as expeditiously as possible with the review process. Doing so will go a long way toward resolving whatever uncertainty has emerged since President Biden issued Executive Order 14008, and will also allow DOI to focus its time and energy on implementing reforms that are adopted through this review process. Accordingly, we believe that DOI should promptly initiate a programmatic environmental impact statement (EIS) process and rulemaking to revise BLM's oil and gas regulations. This should not be the sole vehicle for reforming the program, however, as DOI has existing and wide-ranging authority to make meaningful change outside of the rulemaking process (e.g., through policy guidance).

Turning to our substantive recommendations, we respectfully request that DOI consider taking the following actions, nearly all of which DOI has the authority to carry out administratively. We also encourage DOI to explore opportunities to codify reforms through changes to the Mineral Leasing Act (MLA) and other federal laws, including by working with members of Congress who are sponsoring oil and gas reform legislation.

¹ See, e.g., Fair Returns for Public Lands Act, 117th Cong. (2021) (strengthening the onshore program's fiscal framework, introduced by Sens. Rosen and Grassley); End Speculative Oil and Gas Leasing Act of 2021, S. 607, 117th Cong. (2021) (prohibiting leasing on low and no potential public lands, introduced by Sen. Cortez Masto); Restoring Community Input and Public Protections in Oil and Gas Leasing Act of 2021, H.R. 1503, 117th Cong. (2021) (reforming several aspects of the onshore program, introduced by Rep. Levin); Ending Taxpayer Welfare for Oil and Gas Companies Act, H.R. 1517, 117th Cong. (strengthening the onshore program's fiscal framework, introduced by Rep. Porter); Leasing Market Efficiency Act, S. 4223, 116th Cong. (2020) (ending noncompetitive leasing, introduced by Sen. Tester); Oil and Gas Bonding Reform and Orphaned Well Remediation Act, S. 4642, 116th Cong. (2020) (strengthening the onshore program's bonding framework and funding orphaned well clean-up, introduced by Sen. Bennet).

1. **Establish a new mandate for the onshore program:** BLM has traditionally administered the onshore program as if leasing and development were required.² However, federal courts have consistently ruled otherwise and held that oil and gas development is not the dominant use of public lands and must be weighed against other valid uses, including recreation, fish and wildlife conservation, and renewable energy development.³

Recommendation: DOI should establish a new mandate for the onshore program that affirmatively recognizes oil and gas leasing as a discretionary action that should be authorized only when consistent with multiple use and sustained yield principles.

2. **Guarantee robust public participation and tribal consultation:** Public participation and tribal consultation are essential and required components of the decision-making process for oil and gas activity on public lands. After the Trump Administration tried to make public participation optional for leasing decisions, a federal court ruled that “the public involvement requirements of FLPMA and NEPA cannot be set aside in the name of expediting oil and gas lease sales.”⁴

Recommendation: BLM should amend its oil and gas leasing regulations to require robust public participation and tribal consultation during the leasing and permitting process. BLM should look to IM 2010-117 for guidance; however, robust public participation and tribal consultation should be mandatory, not optional, for all leasing and permitting decisions.

3. **Limit the quantity and scope of competitive sales:** The MLA does not require quarterly/regular lease sales. This is clear from its text, which says that public lands “may be leased” and that DOI has broad authority to declare lands “ineligible” and “unavailable” for leasing.⁵

Recommendation: BLM should revise its oil and gas regulations to clarify that lease sales are not required and that it has broad authority to declare lands ineligible and unavailable for

² See, e.g., Testimony from Michael Nedd, Deputy Director, Operations, BLM, to the U.S. House Committee on Natural Resources, Subcommittee on Energy and Mineral Resources (Mar. 12, 2019) (leasing “required by the Mineral Leasing Act.”); Memorandum from DOI Inspector General, to Robert Abbey, Director, BLM 6 (Dec. 29, 2009) (“Kent Hoffman [Utah’s Deputy State Director for Lands and Minerals] and the BLM USO Natural Resource Specialist both commented that BLM is required by law to hold a quarterly lease sale.”), available at https://www.doi.gov/sites/doi.gov/files/BLM-Lease-Report_508.pdf.

³ See, e.g., *N.M. ex rel. Richardson v. BLM*, 565 F.3d 683, 710 (10th Cir. 2009) (“It is past doubt that the principle of multiple use does not require BLM to prioritize [oil and gas] development over other uses;”) *Nat’l Mining Ass’n v. Zinke*, 877 F.3d 845, 872 (9th Cir. 2017) (“Nor does [multiple use] preclude the agency from taking a cautious approach to assure preservation of natural and cultural resources.”).

⁴ *W. Watersheds Project v. Zinke*, 441 F. Supp. 3d 1042, 1076 (D. Idaho 2020).

⁵ 30 U.S.C. § 226(a), (b)(1)(A); see also *Udall v. Tallman*, 380 U.S. 1, 4 (1965) (“The Mineral Leasing Act . . . left the Secretary discretion to refuse to issue any lease at all on a given tract.”); *W. Energy Alliance v. Salazar*, 709 F.3d 1040, 1044 (10th Cir. 2013) (“The MLA, as amended by the Reform Act of 1987, continues to vest the Secretary with considerable discretion to determine which lands will be leased.”); *McDonald v. Clark*, 771 F.2d 460, 463 (10th Cir. 1985) (“It is clear that the Secretary has broad discretion in this area. While the statute gives the Secretary the authority to lease government lands under oil and gas leases, this power is discretionary rather than mandatory.”); *Bob Marshall Alliance v. Hodel*, 852 F.2d 1223, 1230 (9th Cir. 1988) (“We have held that the [MLA] ‘allows the Secretary to lease such lands, but does not require him to do so. . . . The Secretary has discretion to refuse to issue any lease at all on a given tract.’ Thus refusing to issue the Deep Creek [oil and gas] leases . . . would constitute a legitimate exercise of the discretion granted to the Interior Secretary under that statute.”).

leasing. It may also be advisable to obtain a Solicitor's Opinion on the MLA's quarterly sale provision and BLM's authority to declare lands ineligible and unavailable for leasing.

4. **Switch to a "formal" nomination process:** BLM has existing regulatory authority to employ a "formal" lease nominations process, which would allow BLM to strategically identify lands that are suitable for nomination.⁶ Under the "informal" nominations process, which has been used since passage of the Federal Onshore Oil and Gas Leasing Reform Act in 1987, anyone can anonymously nominate any parcel of public land for leasing. As a consequence, over 110 million acres of public lands were nominated between 2011 and 2020, a land mass larger than the State of California.⁷ Over the same period, just 11.4 million acres of leases received bids, underscoring the speculative nature of most lease nominations and the waste and inefficiency of the "informal" nominations process.⁸

Recommendation: BLM should consider using the "formal" nominations process set forth in its existing regulations. Further, BLM should revoke Instruction Memorandum (IM) 2014-004, which authorizes anonymous lease nominations, and issue a new policy that requires anyone nominating public lands for leasing to disclose their identity as well as the identities of third parties who they are representing.

5. **Develop and employ resource "screens:"** BLM does not routinely screen nominated leases against criteria that are designed to eliminate conflicts with other uses and resources and to maximize taxpayer returns. The Federal Land Policy and Management Act and the MLA both authorize the use of screens, including "to prevent unnecessary or undue degradation" and "for the safeguarding of the public welfare."⁹

Recommendation: BLM should amend its leasing regulations to require the adoption of nationwide and state-specific screens that should be employed to eliminate and reduce conflicts with other uses and resources. These screens should be reevaluated and revised on an ongoing basis, but should include a prohibition on leasing lands with low or no oil and gas potential.

6. **Ensure the public interest is served by noncompetitive leasing:** Noncompetitive leases are rarely developed – in fact, GAO recently found that just 1 percent of noncompetitive leases issued between 2003 and 2009 entered production.¹⁰ Even when undeveloped, these leases can and do burden other uses by limiting land use planning options and discouraging conservation designations.

Recommendation: BLM should amend its oil and gas regulations to require a "public interest" determination prior to issuing noncompetitive leases. This determination should

⁶ 43 C.F.R. § 3120.3-1.

⁷ BLM, Expressions of Interest By Calendar Year, available at <https://www.blm.gov/programs-energy-and-minerals-oil-and-gas-oil-and-gas-statistics>.

⁸ BLM, Acreage Offered at Competitive Lease Sale Auctions Since January 1, 2009, available at <https://www.blm.gov/programs-energy-and-minerals-oil-and-gas-oil-and-gas-statistics>.

⁹ 43 U.S.C. § 1732(b); 30 U.S.C. § 187.

¹⁰ GAO, Onshore Competitive and Noncompetitive Lease Revenues (Nov. 2020), available at <https://www.gao.gov/assets/gao-21-138.pdf>.

¹¹ The Wilderness Society, No Exit: Fixing the BLM's Indiscriminate Energy Leasing (June 2016), available at <https://www.wilderness.org/sites/default/files/media/file/Report-No%20Exit-Fixing%20BLM%20Leasing.pdf>.

inform whether applicants for noncompetitive leases are “responsible” and “qualified” under 30 U.S.C. § 226(c)(1), and should evaluate such factors as the applicant’s ability to undertake development and compliance history, including whether the applicant has a history of failing to make rental or other payments. BLM should also create and maintain a publicly-accessible portal for noncompetitive lease offers (pre- and post-sale), and provide the public with at least 30 days to review and comment on noncompetitive lease offers.

- 7. Strengthen the onshore program’s fiscal framework:** The onshore program’s fiscal framework is woefully outdated, does not guarantee a fair return to taxpayers, and fails to discourage speculators from hoarding idle, undeveloped leases. In fact, the onshore royalty rate of 12.5% has not changed in over 100 years, while rental rates and minimum lease bids are also decades-old. ² This has resulted in billions in lost revenues. ³ Further, because the program’s fiscal framework is so weak – rental rates, which are supposed to incentivize development, increase from just \$1.50/acre to \$2.00/acre after 5 years – speculators are able to stockpile hundreds of idle leases without ever putting them into production. ⁴

Recommendation: BLM should strengthen the onshore program’s fiscal framework by amending its oil and gas regulations to increase the royalty rate, rental rates, and minimum lease bids. In doing so, BLM should look to recent legislation from Senators Rosen and Grassley, as well as reports from CBO and GAO, for guidance. Also, BLM can likely increase rates – in particular, the royalty rate – on a lease-by-lease basis. Thus, BLM should issue a policy directive that requires the use of increased rates.

- 8. Strengthen the onshore program’s bonding and reclamation framework:** The existing regulatory framework for inactive and orphaned wells is completely inadequate, as it lets industry shift millions in clean-up costs to taxpayers and fails to protect public lands, waters, and nearby communities from the impacts of aging and abandoned infrastructure. According to GAO, BLM has collected just \$204 million in reclamation bonds from industry, ⁵ even though reclamation costs for all of the wells on federal lands could exceed \$6 billion. ⁶ GAO and DOI’s Inspector General have both repeatedly advised BLM to

¹² GAO, Raising Federal Rates Could Decrease Production on Federal Lands but Increase Federal Revenue (June 2017), available at <https://www.gao.gov/assets/gao-17-540.pdf>.

¹³ Taxpayers for Common Sense, Royally Losing: Higher Royalties on State and Offshore Oil and Gas Production Reap Billions More than Drilling on Federal Lands (Feb. 2020), available at <https://www.taxpayer.net/wp-content/uploads/2020/02/TCS-Royally-Losing-2020.pdf>.

¹⁴ Taxpayers for Common Sense, The Cost of Speculation in Federal Oil and Gas Leases (Oct. 2017) (identifying four characteristics of speculation), available at https://www.taxpayer.net/energy-natural-resources/locked-out-the-cost-of-speculation-in-federal-oil-and-gas-leases/#_ftn1; Center for American Progress, How Cheap Federal Leases Benefit Oil and Gas Companies (Aug. 2018), available at <https://www.americanprogress.org/issues/green/reports/2018/08/29/455138/cheap-federal-leases-benefit-oil-gas-companies/>.

¹⁵ GAO, Bureau of Land Management Should Address Risks from Insufficient Bonds to Reclaim Wells (Sept. 2019), available at <https://www.gao.gov/assets/gao-19-615.pdf>.

¹⁶ Center for Western Priorities, Reclaiming Oil and Gas Wells on Federal Lands: Estimate of Costs (Feb. 2018), available at <https://westernpriorities.org/wp-content/uploads/2018/02/Bonding-Report.pdf>; see also National Wildlife Federation & Public Lands Solutions, Inactive Oil & Gas Wells on Federal Lands & Minerals: Potential Costs and Conflicts (Mar. 2021) (identifying over \$1 billion in reclamation costs for 8,050 long-term inactive wells on federal lands), available at <https://publiclandsolutions.org/wp-content/uploads/2021/03/03-17-21-Inactive-Oil-and-Gas-Wells-on-Federal-Lands-and-Minerals-Report.pdf>.

strengthen its oversight of inactive and orphaned wells, including by increasing bond amounts to reflect the actual costs of reclamation.⁷

Recommendation: BLM should amend its oil and gas regulations to eliminate or minimize the use of blanket bonds and require that bonds be based on the full costs of plugging, abandonment, and reclamation. Further, BLM should issue new policies that increase oversight of inactive wells and limit the ability of operators to indefinitely delay final reclamation. Finally, BLM should work with Congress to obtain funds to clean-up orphaned wells and to authorize a user fee to cover additional reclamation costs, as recommended by GAO.

- 9. Limit participation by speculators and bad actors:** BLM has broad authority to limit participation in the leasing process to “responsible qualified” bidders and cannot issue leases to companies that are violating “reclamation requirements and other standards . . . for any prior lease. . . .”⁸ Yet, BLM does little to scrutinize the compliance records or development intentions/capabilities of participants in the oil and gas leasing process, which allows speculators and bad actors to freely obtain new leases.

Recommendation: BLM should amend its oil and gas regulations to establish criteria for determining “responsible qualified” bidders and to prohibit or limit participation by companies that violate reclamation and other environmental protection standards and fail to make rental and other required payments. Further, BLM should publicly post and regularly update the list of “Entities in Noncompliance with Reclamation Requirements of Section 17(g) of MLA,” which it is supposed to maintain under Handbook 3120-1 (Competitive Leases).⁹

- 10. Strengthen oversight of lease suspensions:** According to a recent GAO report, BLM is not providing “consistent and effective oversight” of lease suspensions.²⁰ As a result, there are hundreds of leases that have been suspended for over a decade and that are not generating any revenues for taxpayers. In many cases, the original basis for these suspensions has long since gone away. These suspended leases also inhibit multiple-use management by saddling public lands with long-term, idle leases.²

¹⁷ GAO, Bonding Requirements and BLM Expenditures to Reclaim Orphaned Wells (Jan. 2010), *available at* <https://www.gao.gov/assets/gao-10-245.pdf>; GAO, BLM Needs a Comprehensive Strategy to Better Manage Potential Oil and Gas Well Liability (Feb. 2011), *available at* <https://www.gao.gov/assets/gao-11-292.pdf>; DOI Office of the Inspector General, BLM Oil and Gas Bonding Procedures (Sept. 2012), *available at* <https://doioig.opengov.ibmcloud.com/sites/doioig.gov/files/BLM%20Oil%20and%20Gas%20Bonding%20Procedures.pdf>; DOI Office of the Inspector General, Bureau of Land Management’s Idle Well Program (Jan. 2018), *available at* https://www.doioig.gov/sites/doioig.gov/files/FinalEvaluation_BLMIdleWells_011718.pdf; GAO, Bureau of Land Management Needs to Improve Its Data and Oversight of Potential Liabilities (May 2018), *available at* <https://www.gao.gov/assets/gao-18-250.pdf>; GAO, Bureau of Land Management Should Address Risks from Insufficient Bonds to Reclaim Wells (Sept. 2019).

¹⁸ 30 U.S.C. § 226(b)(1)(A), (g).

¹⁹ BLM, H-3120-1 – Competitive Leases Appendix 4-1 (Feb. 2013), *available at* https://www.blm.gov/sites/blm.gov/files/uploads/Media_Library_BLM_Policy_h3120.pdf.

²⁰ GAO, BLM Could Improve Oversight of Lease Suspensions with Better Data and Monitoring Procedures (June 2018), *available at* <https://www.gao.gov/assets/gao-18-411.pdf>.

²¹ The Wilderness Society, Land Hoarders: How Stockpiling Leases is Costing Taxpayers (Dec. 2015), *available at* <https://www.gao.gov/assets/gao-18-411.pdf>.

Recommendation: BLM should amend its oil and gas regulations to require NEPA compliance and public participation prior to granting lease suspensions. Further, BLM should establish criteria to govern the evaluation of suspension applications, which should place the burden of justifying suspensions on applicants, particularly in cases where leases are nearing their expiration dates.

Conclusion

Thank you again for the opportunity to provide these recommendations. We look forward to engaging with DOI as this important process moves forward.

Sincerely,

Russell Kuhlman
Executive Director
Nevada Wildlife Federation

Ángel Peña
Executive Director
The Nuestra Tierra Conservation Project

Alison Gallensky
Principal Conservation Geographer
Rocky Mountain Wild

Jason Keith
Managing Director
Public Land Solutions

Sara Loflin
Executive Director
League of Oil and Gas Impacted Coloradans (LOGIC)

Kate Hoit
Western States Director
Vet Voice Foundation

Phil Francis
Chair
Coalition to Protect America's National Parks

Josh Ewing
Executive Director
Friends of Cedar Mesa

Marcia Westkott
Chair
Powder River Basin Resource Council

Guy Alsentzer
Executive Director
Upper Missouri Waterkeeper

Paul Reed
Preservation Archaeologist/Chaco Scholar
Archaeology Southwest

Bill Midcap
Senior Policy Advisor
Rocky Mountain Farmers Union

Suzanne O'Neill
Executive Director
Colorado Wildlife Federation

Jordan Smith
Executive Director
Climate Advocates Voces Unidas

Barbara Vasquez
Chair, Oil and Gas Team
Western Organization of Resource Councils

Mariana Del Valle Prieto Cervantes
Clean & Healthy Waters Advocate
GreenLatinos

John Rader
Conservation Advocate
Wyoming Outdoor Council

Emily Hornback
Director
Western Colorado Alliance

Mark Pearson
Executive Director
San Juan Citizens Alliance

Alec Underwood
Federal Conservation Campaigns Director
Montana Wildlife Federation

Camilla Simon
Executive Director
Hispanics Enjoying Camping, Hunting, and the Outdoors (HECHO)

Jon Goldstein
Director, Regulatory & Legislative Affairs

Environmental Defense Fund

Alex Taurel
Conservation Program Director
League of Conservation Voters

Maite Arce
President
Hispanic Access Foundation

Whitney Tawney
Executive Director
Montana Conservation Voters

Aubrey R. Bertram
Staff Attorney
Montana Wilderness Association

Jerry Otero
Legislative and Policy Director
Grand Canyon Trust

Danielle Murray
Senior Legal and Policy Director
Conservation Lands Foundation

Alex Daue
Assistant Director, Energy & Climate
The Wilderness Society

Mark Allison
Executive Director
New Mexico Wild

James Jimenez
Executive Director
New Mexico Voices for Children

Lucas Herndon
Energy and Policy Director
ProgressNow New Mexico

Paul Selberg
Executive Director
Nevada Conservation League and Education Fund

Jesse Deubel
Executive Director
New Mexico Wildlife Federation

Juli Slivka
Conservation Director
Wilderness Workshop

Leslie Robinson
Chair
Grand Valley Citizens Alliance

Meaghan Trowbridge
President
New Mexico Archeological Council

Luke Schafer
West Slope Director
Conservation Colorado

Joan Brown, osf
Executive Director
New Mexico Interfaith Power and Light

Anna Peterson
Executive Director
The Mountain Pact

From: [Feldgus, Steve](#)
To: [Rezaeero, Paniz](#)
Cc: [Sanchez, Alexandra L](#)
Subject: RE: [EXTERNAL] FW: Interior Department Outlines Next Steps in Fossil Fuels Program Review
Date: Tuesday, March 9, 2021 3:44:22 PM

Thanks, Paniz.

Alex, I'm just wondering about the 5 million acres leased offshore figure, since when I add up the lease sale data from the BOEM website I get 4.59M acres (including the Nov 2020 sale). Am I missing a sale?

Thanks,

--Steve

From: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Sent: Tuesday, March 9, 2021 2:53 PM
To: Feldgus, Steve <Steve.Feldgus@mail.house.gov>
Cc: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: RE: [EXTERNAL] FW: Interior Department Outlines Next Steps in Fossil Fuels Program Review

Directing you to Alex Sanchez who can see if she is able to get you that information.

Paniz Rezaeero
Deputy Director of Congressional Affairs - House
Department of the Interior
1849 C Street, NW
Washington, DC 20240
paniz_rezaeero@ios.doi.gov

NOTE: Every email I send or receive is subject to release under the Freedom of Information Act.

From: Feldgus, Steve <Steve.Feldgus@mail.house.gov>
Sent: Tuesday, March 9, 2021 2:49 PM
To: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Subject: RE: [EXTERNAL] FW: Interior Department Outlines Next Steps in Fossil Fuels Program Review

Thanks – could I get a breakdown on where that number came from?

From: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Sent: Tuesday, March 9, 2021 2:46 PM
To: Feldgus, Steve <Steve.Feldgus@mail.house.gov>

Subject: RE: [EXTERNAL] FW: Interior Department Outlines Next Steps in Fossil Fuels Program Review

The 5 million offshore is not rounded from what I am told.

Paniz Rezaeero
Deputy Director of Congressional Affairs - House
Department of the Interior
1849 C Street, NW
Washington, DC 20240
paniz_rezaeero@ios.doi.gov

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From: Feldgus, Steve <Steve.Feldgus@mail.house.gov>
Sent: Tuesday, March 9, 2021 12:00 PM
To: Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Subject: [EXTERNAL] FW: Interior Department Outlines Next Steps in Fossil Fuels Program Review

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Just wanted to check on the offshore stat in here – I get 4.59M acres, so is this a round up to 5?

From: U.S. Department of the Interior <info@updates.interior.gov>
Sent: Tuesday, March 9, 2021 11:03 AM
To: Feldgus, Steve <Steve.Feldgus@mail.house.gov>
Subject: Interior Department Outlines Next Steps in Fossil Fuels Program Review

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Interior Department Outlines Next Steps in Fossil Fuels Program Review

WASHINGTON – As part of the comprehensive review of the federal oil and gas program called for in Executive Order 14008, the Interior Department will host a virtual forum on Thursday, March 25th. The day-long forum will feature several panels to highlight perspectives from industry representatives, labor and environmental justice organizations, natural resource advocates, and other experts.

Fossil fuel extraction on public lands accounts for nearly a quarter of all U.S. greenhouse gas emissions. Multiple bills in Congress have been introduced in recent years to reform the program, including those to better ensure the public is not shut out of land management and leasing decisions; to address the mounting cleanup and remediation costs of orphan wells scattered across the country; and to provide a fair return to taxpayers for the use of their resources.

Over the last few years the oil and gas industry has stockpiled millions of acres of leases on public lands and waters. Onshore, of the more than 26 million acres under lease to the oil and gas industry, nearly 13.9 million (or 53%) of those acres are non-producing. Offshore, of the more than 12 million acres of public waters under lease, over 9.3 million (or 77%) of those acres are non-producing. Onshore and offshore, the oil and gas industry currently holds approximately 7,700 unused, approved drilling permits.

Yet in spite of these facts, the Trump administration offered for lease more than 25 million acres of public land onshore and more than 78 million acres offshore for oil, gas and mineral development. While only 5.6 million onshore acres were purchased and 5 million offshore, this result clearly indicates that it is time for the Interior Department to take steps to better manage our public lands.

“The federal oil and gas program is not serving the American public well. It’s time to take a close look at how to best manage our nation’s natural resources with current and future generations in mind,” said **Principal Deputy Assistant Secretary - Land and Minerals Management Laura Daniel-Davis**. “This forum will help inform the Department’s near-term actions to restore balance on America’s lands and waters and to put our public lands’ energy programs on a more sound and sustainable conservation, fiscal and climate footing.”

The information gathered at the forum, which will be livestreamed, will help inform an interim report from the Department that will be completed in early summer. The report will include initial findings on the state of the federal conventional energy programs, as well as outline next steps and recommendations for the Department and Congress to improve stewardship of public lands and waters, create jobs, and build a just and equitable energy future.

In addition to the forum, the Interior Department is conducting outreach to Members of Congress, Governors, Tribes, and other state and local elected leaders. Members of the public will be able to offer written comments to inform the interim report. Details on how to view the forum or submit comments will be forthcoming.

###

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· Washington DC 20240 · 202-208-3100



From: [Rezaeero, Paniz](#)
To: [Sanchez, Alexandra L](#); [Cherry, Tyler A](#)
Subject: RE: [EXTERNAL] FW: Interior Department Outlines Next Steps in Fossil Fuels Program Review
Date: Tuesday, March 9, 2021 2:38:41 PM

Unless y'all recommend differently, I will just tell Steve that that is the number provided to us by BOEM earlier this year for the EO launch. Knowing Steve he will have follow-up questions, in which case I can deter him to you Alex?

Paniz Rezaeero
Deputy Director of Congressional Affairs - House
Department of the Interior
1849 C Street, NW
Washington, DC 20240
paniz_rezaeero@ios.doi.gov

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From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Tuesday, March 9, 2021 2:37 PM
To: Cherry, Tyler A <tyler_cherry@ios.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Subject: RE: [EXTERNAL] FW: Interior Department Outlines Next Steps in Fossil Fuels Program Review

It doesn't appear to have been a round up on the press team's behalf. Below is what BOEM gave the team earlier this year for the EO launch.

Tyler, this was from a Jen Russo email, so she may be the best person to connect with if we need to do additional follow up!

Alex

During the Trump administration:

- More than 25 million acres were offered for lease to oil and gas and mineral development onshore, nearly 6 million (5,581,410) of which were purchased (confirmed by BLM)
- Since 2017 eight offshore lease sales were held, including seven in the Gulf of Mexico and one offshore Alaska
 - For each Gulf of Mexico sale, approximately 77 million acres were offered for each sale, of which 5 million total were purchased
 - For the Alaska lease sale, 1.09 million acres were offered, of which over 76,000 were purchased (confirmed by BOEM)

From: Sanchez, Alexandra L
Sent: Tuesday, March 9, 2021 2:07 PM
To: Cherry, Tyler A <tyler_cherry@ios.doi.gov>; Rezaeero, Paniz <paniz_rezaeero@ios.doi.gov>
Subject: RE: [EXTERNAL] FW: Interior Department Outlines Next Steps in Fossil Fuels Program Review

Looking into this and will get back to you!

From: Cherry, Tyler A <tyler_cherry@ios.doi.gov>
Sent: Tuesday, March 9, 2021 12:40 PM
To: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>
Cc: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: RE: [EXTERNAL] FW: Interior Department Outlines Next Steps in Fossil Fuels Program Review

I think + Alex for this?

Tyler Cherry
Press Secretary
Office of the Secretary
U.S. Department of the Interior
(c) 202-549-2988

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From: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>
Sent: Tuesday, March 9, 2021 12:33 PM
To: Cherry, Tyler A <tyler_cherry@ios.doi.gov>
Subject: FW: [EXTERNAL] FW: Interior Department Outlines Next Steps in Fossil Fuels Program Review

See question below.

Paniz Rezaeerod
Deputy Director of Congressional Affairs - House
Department of the Interior
1849 C Street, NW
Washington, DC 20240
paniz_rezaeerod@ios.doi.gov

NOTE: Every email I send or receive is subject to release under the Freedom of Information Act.

From: Feldgus, Steve <Steve.Feldgus@mail.house.gov>
Sent: Tuesday, March 9, 2021 12:00 PM
To: Rezaeerod, Paniz <paniz_rezaeerod@ios.doi.gov>
Subject: [EXTERNAL] FW: Interior Department Outlines Next Steps in Fossil Fuels Program Review

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From: U.S. Department of the Interior <info@updates.interior.gov>

Sent: Tuesday, March 9, 2021 11:03 AM

To: Feldgus, Steve <Steve.Feldgus@mail.house.gov>

Subject: Interior Department Outlines Next Steps in Fossil Fuels Program Review

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Date: Tuesday, March 9, 2021
Contact: Interior_Press@ios.doi.gov

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holds approximately 7,700 unused, approved drilling permits.

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From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: RE: [EXTERNAL] Following-up on Recent RFF Studies of Federal Leasing Ban
Date: Thursday, March 11, 2021 1:22:01 PM

Thank you! Will report back.

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Thursday, March 11, 2021 11:11 AM
To: Culver, Nada L <nada_culver@ios.doi.gov>
Cc: Diera, Alexx A <alex_x_diera@ios.doi.gov>
Subject: FW: [EXTERNAL] Following-up on Recent RFF Studies of Federal Leasing Ban

Testimony attached!

Alex

From: Michael, Jennifer <jmichael@rff.org>
Sent: Saturday, March 6, 2021 11:35 PM
To: Kelly, Katherine P <Kate_Kelly@ios.doi.gov>
Cc: Diera, Alexx A <adiera@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Prest, Brian <prest@rff.org>
Subject: RE: [EXTERNAL] Following-up on Recent RFF Studies of Federal Leasing Ban

Kate, (Alexx & Alex)

No worries. The testimony is attached. It is embargoed until the Committee releases it. In the meantime, if you have any questions, I'm happy to help set up time with Brian.

Thanks,
Jennifer.
202-215-4943

From: Kelly, Katherine P <Kate_Kelly@ios.doi.gov>
Sent: Saturday, March 6, 2021 2:31 PM
To: Michael, Jennifer <jmichael@rff.org>
Cc: Diera, Alexx A <adiera@blm.gov>; Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: RE: [EXTERNAL] Following-up on Recent RFF Studies of Federal Leasing Ban

Hi Jennifer – apologies for the delayed response here! Appreciate your offer here. I'm looping Alex and Alexx, who are working with senior staff to gather information on the federal leasing program to inform next steps. We'd welcome seeing the testimony, when it's available, and may be in touch with other questions.

Cheers,

Kate

From: Michael, Jennifer <jmichael@rff.org>

Sent: Friday, February 26, 2021 1:19 AM

To: Kelly, Katherine P <Kate_Kelly@ios.doi.gov>

Subject: [EXTERNAL] Following-up on Recent RFF Studies of Federal Leasing Ban

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear Kate,

I believe you and Amanda and Elizabeth received the below information as the transition team was transitioning. We just wanted to follow-up. Brian Prest, the RFF researcher who has conducted the research referenced below will be testifying at an upcoming House NR hearing (Steve's subcommittee) in March. Perhaps there are now folks in place that could be interested in a briefing or a quick chat prior to that. Happy to hear from you about what would be helpful to you and other relevant staff at this stage.

Thanks much,
Jennifer.

Jennifer Michael, Senior Advisor, Research Group, Resources for the Future

1616 P St NW, Suite 600 • Washington, DC 20036 • 202.215.4943 • jmichael@rff.org

NOTE SENT TO TRANSITION TEAM PRIOR:

Dear Liz,

It has come to our attention that recent research Resources for the Future (RFF) has conducted may be of interest to the Biden transition team as it considers changes to oil and gas leasing policy on federal land. We are reaching out to enable a conversation if you would like, and to answer any questions you may have. I can help to set up a call if that is helpful. My contact info is below.

The links to our recent publications and analysis can also be found below. In summary, to date we have published a paper and two shorter articles that provide summaries on the topic. In the paper, Brian Prest, RFF Fellow, (<https://www.rff.org/people/brian-c-prest/>) explores the effect specifically of a federal leasing ban, carbon adder, or royalty rate changes on oil & gas production, emissions, and federal royalty revenues. For a quick picture of the findings, you may refer to Figure 1 and Table 1 which show annual averages from 2020-2050. In addition, Brian has the raw annual values the can

be used to calculate the impacts on production, emissions, and revenues if there is interest. You can already see some of the annual patterns in Figure 2 of the paper and blog posts, among other figures.

With some additional analysis, RFF can present state-level breakdowns of the production and federal revenue numbers (important because ~half goes back to the respective states, at least for onshore wells). Essentially with our data set, Brian could do a back of the envelope disaggregation of the revenue numbers to the state level, but it would probably take a few days to make sure it is as accurate as possible. If this information and analysis would be helpful to you and your colleagues in determining policy outcomes, RFF would be able to conduct the analysis in a timely manner.

Again, we are reaching out to you to make you aware of the capability in regards to data and analysis RFF has in this area that could be applicable to your work right now. We are an independent, nonprofit research institution in Washington, DC. RFF's mission is to improve environmental, energy, and natural resource decisions through impartial economic research and policy engagement. Our organization is headed by former EIA Administrator Richard Newell. More about RFF can be found here for your reference (<https://www.rff.org/about/>). I am located in Washington, DC and available to help connect you to Brian at your convenience. I can be reached by cell at 202-215-4943 anytime.

Most sincerely,
Jennifer Michael

Jennifer Michael, Senior Advisor, Research Group, Resources for the Future

1616 P St NW, Suite 600 • Washington, DC 20036 • 202.215.4943 • jmichael@rff.org

SUMMARY OF RECENT RFF PUBLICATIONS ON LEASING ON FEDERAL LANDS & THEIR LINKS:

Brian's paper, "**Supply-Side Reforms to Oil and Gas Production on Federal Lands: Modeling the Implications for Climate Emissions, Revenues, and Production Shifts** -

An examination of three proposed policies to reform the federal oil and gas leasing program: increased royalty rates, carbon adders, and a ban on new leases on federal lands," can be found here:

<https://www.rff.org/publications/working-papers/supply-side-reforms-oil-and-gas-production-federal-lands/>

1. Note there's an infographic summarizing the results below the link to download the paper (at the above link).
2. A Blog post summarizing the paper is here: <https://www.resourcesmag.org/common-resources/economic-and-emissions-consequences-supply-side-reforms-oil-and-gas-production-federal-lands/>
3. Key numerical results are depicted in Figure 1 and contained in Table 1

Brian's article in RFF Resources Magazine discussing options for federal leasing policy can be found

here:

<https://www.resourcesmag.org/archives/policy-options-oil-and-gas-leasing-reform-federal-lands-and-waters/>

1. This article considers the case for the alternative policy of charging carbon adders for federal oil and gas leases, instead of a leasing ban, among other things.
2. Note that carbon adders were considered by the Obama admin for federal coal leases, and RFF has work on that as well if you are interested.

Brian also published an open critique of the American Petroleum Institute's study on the same topic which can be found here:

<https://www.resourcesmag.org/common-resources/examining-effects-federal-leasing-ban-drilling-industry-study/>

From: [Diera, Alexx A](#)
To: [Daniel-Davis, Laura E](#); [Kelly, Katherine P](#)
Cc: [Sanchez, Alexandra L](#)
Subject: Re: [EXTERNAL] Following-up on Recent RFF Studies of Federal Leasing Ban
Date: Friday, February 26, 2021 10:14:01 AM

Looping in Alex S here. Both of us are interested in learning more about RFF's analysis. Let us know how we can be helpful in proceeding.

Best,
Alexx

--

Alexx Diera (*she/her*)
Special Assistant
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From: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Sent: Friday, February 26, 2021 8:21 AM
To: Kelly, Katherine P <Kate_Kelly@ios.doi.gov>
Cc: Diera, Alexx A <alex_x_diera@ios.doi.gov>
Subject: Re: [EXTERNAL] Following-up on Recent RFF Studies of Federal Leasing Ban

Hi-

I'm pretty sure Alex S has this report and is reviewing it for the review. Alexx - can you confirm if she'd like to have a direct chat with the RFF folks? Thanks for sharing Kate - it may help Alex (and Alexx too if she wants to join) to get more specifically briefed.

Laura

From: Kelly, Katherine P <Kate_Kelly@ios.doi.gov>
Sent: Friday, February 26, 2021 6:37 AM
To: Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>
Cc: Diera, Alexx A <alex_x_diera@ios.doi.gov>
Subject: Fw: [EXTERNAL] Following-up on Recent RFF Studies of Federal Leasing Ban

Laura - let me know if you want to be looped! otherwise, I'll say 'thanks - we look forward to seeing their testimony'

From: Michael, Jennifer <jmichael@rff.org>

Sent: Friday, February 26, 2021 1:19 AM

To: Kelly, Katherine P <Kate_Kelly@ios.doi.gov>

Subject: [EXTERNAL] Following-up on Recent RFF Studies of Federal Leasing Ban

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Dear Kate,

I believe you and Amanda and Elizabeth received the below information as the transition team was transitioning. We just wanted to follow-up. Brian Prest, the RFF researcher who has conducted the research referenced below will be testifying at an upcoming House NR hearing (Steve's subcommittee) in March. Perhaps there are now folks in place that could be interested in a briefing or a quick chat prior to that. Happy to hear from you about what would be helpful to you and other relevant staff at this stage.

Thanks much,
Jennifer.

Jennifer Michael, Senior Advisor, Research Group, Resources for the Future

1616 P St NW, Suite 600 • Washington, DC 20036 • 202.215.4943 • jmichael@rff.org

NOTE SENT TO TRANSITION TEAM PRIOR:

Dear Liz,

It has come to our attention that recent research Resources for the Future (RFF) has conducted may be of interest to the Biden transition team as it considers changes to oil and gas leasing policy on federal land. We are reaching out to enable a conversation if you would like, and to answer any questions you may have. I can help to set up a call if that is helpful. My contact info is below.

The links to our recent publications and analysis can also be found below. In summary, to date we have published a paper and two shorter articles that provide summaries on the topic. In the paper, Brian Prest, RFF Fellow, (<https://www.rff.org/people/brian-c-prest/>) explores the effect specifically of a federal leasing ban, carbon adder, or royalty rate changes on oil & gas production, emissions, and federal royalty revenues. For a quick picture of the findings, you may refer to Figure 1 and Table 1 which show annual averages from 2020-2050. In addition, Brian has the raw annual values that can be used to calculate the impacts on production, emissions, and revenues if there is interest. You can already see some of the annual patterns in Figure 2 of the paper and blog posts, among other figures.

With some additional analysis, RFF can present state-level breakdowns of the production and federal revenue numbers (important because ~half goes back to the respective states, at least for onshore wells). Essentially with our data set, Brian could do a back of the envelope disaggregation of the revenue numbers to the state level, but it would probably take a few days to make sure it is as accurate as possible. If this information and analysis would be helpful to you and your colleagues in determining policy outcomes, RFF would be able to conduct the analysis in a timely manner.

Again, we are reaching out to you to make you aware of the capability in regards to data and analysis RFF has in this area that could be applicable to your work right now. We are an independent, nonprofit research institution in Washington, DC. RFF's mission is to improve environmental, energy, and natural resource decisions through impartial economic research and policy engagement. Our organization is headed by former EIA Administrator Richard Newell. More about RFF can be found here for your reference (<https://www.rff.org/about/>). I am located in Washington, DC and available to help connect you to Brian at your convenience. I can be reached by cell at 202-215-4943 anytime.

Most sincerely,
Jennifer Michael

Jennifer Michael, Senior Advisor, Research Group, Resources for the Future

1616 P St NW, Suite 600 • Washington, DC 20036 • 202.215.4943 • jmichael@rff.org

SUMMARY OF RECENT RFF PUBLICATIONS ON LEASING ON FEDERAL LANDS & THEIR LINKS:

Brian's paper, **"Supply-Side Reforms to Oil and Gas Production on Federal Lands: Modeling the Implications for Climate Emissions, Revenues, and Production Shifts -**

An examination of three proposed policies to reform the federal oil and gas leasing program: increased royalty rates, carbon adders, and a ban on new leases on federal lands," can be found here:

<https://www.rff.org/publications/working-papers/supply-side-reforms-oil-and-gas-production-federal-lands/>

1. Note there's an infographic summarizing the results below the link to download the paper (at the above link).
2. A Blog post summarizing the paper is here: <https://www.resourcesmag.org/common-resources/economic-and-emissions-consequences-supply-side-reforms-oil-and-gas-production-federal-lands/>
3. Key numerical results are depicted in Figure 1 and contained in Table 1

Brian's article in RFF Resources Magazine discussing options for federal leasing policy can be found here:

<https://www.resourcesmag.org/archives/policy-options-oil-and-gas-leasing-reform-federal-lands-and-waters/>

1. This article considers the case for the alternative policy of charging carbon adders for federal oil and gas leases, instead of a leasing ban, among other things.
2. Note that carbon adders were considered by the Obama admin for federal coal leases, and RFF has work on that as well if you are interested.

Brian also published an open critique of the American Petroleum Institute's study on the same topic which can be found here:

<https://www.resourcesmag.org/common-resources/examining-effects-federal-leasing-ban-drilling-industry-study/>

From: [Alexandra Sanchez](#)
To: [Sanchez, Alexandra L](#)
Subject: [EXTERNAL] Fwd: Coal Report
Date: Wednesday, February 24, 2021 3:33:38 PM
Attachments: [document_gw_02.pdf](#)

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----- Forwarded message -----

From: Alexandra Sanchez (b) (6)
Date: Wed, Feb 24, 2021 at 3:30 PM
Subject: Coal Report
To: Alexandra Sanchez (b) (6)



U.S. Department of the Interior
Bureau of Land Management
Washington Office

Volume 1
January 2017

Federal Coal Program

Programmatic Environmental Impact Statement - Scoping Report



Our Vision

To enhance the quality of life for all citizens through the balanced stewardship of America's public lands and resources.

Our Mission

To sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.

FEDERAL COAL PROGRAM PROGRAMMATIC EIS SCOPING REPORT

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- 4. SUMMARY OF COMMENTS RECEIVED**
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ACRONYMS AND ABBREVIATIONS

Full Phrase

AR5	IPCC 2013–2014 Fifth Assessment Report
BLM	Bureau of Land Management
BOEM	Bureau of Ocean Energy Management
Btu	British thermal units
CEA	Council of Economic Advisers
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent
PEIS	programmatic environmental impact statement
CPP	Clean Power Plan
DME	Office of Valuation Services, Division of Minerals Evaluation
EIA	Energy Information Administration
EIS	environmental impact statement
EPA	Environmental Protection Agency
FCLAA	Federal Coal Leasing Amendments Act of 1976
FLPMA	Federal Land Policy and Management Act of 1976
FMV	fair market value
GAO	Government Accountability Office
GW	gigawatts
INDC	US 2025 Intended Nationally Determined Contribution
IPM	Integrated Planning Model
LBA	lease-by-application
LCOE	levelized cost of electricity

MSHA	Mine Safety and Health Administration
NCA3	2014 National Climate Assessment, Climate Change Impacts in the United States
NEPA	National Environmental Policy Act of 1969
NO _x	nitrogen oxides
NRC	National Research Council
OIG	US Department of the Interior, Office of Inspector General
ONRR	Office of Natural Resource Revenue
OSMRE	Office of Surface Mining Reclamation and Enforcement
OVS	Office of Valuation Services
RA	regulatory authority
SMCRA	Surface Mining Control and Reclamation Act of 1977
SO	BLM State Office
SO ₂	sulfur dioxide
TWh	terawatt hours
UNFCCC	United Nations Framework Convention on Climate Change
USC	United States Code
USGS	US Geological Survey

Volume I

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EXECUTIVE SUMMARY

BACKGROUND

In addition to its responsibilities for managing 247 million acres of land and other resources, the Bureau of Land Management (BLM) is responsible for managing coal leasing on approximately 570 million acres where the coal mineral estate is owned by the Federal Government. The BLM manages these resources on behalf of their owners, the American people. This responsibility includes advancing the safe and responsible development of energy resources while promoting the conservation and protection of scientific, historic, and environmental values of our lands for generations to come.

The BLM currently administers 306 coal leases encompassing over 475,000 acres in 10 states, with an estimated 7.4 billion tons of recoverable coal. Over the last decade, BLM-administered leases have produced over 4 billion tons of coal, resulting in the collection of over \$10 billion in Federal revenue that is shared with the state from which the mineral was mined. The recoverable coal currently under lease is estimated to be enough to continue production at current levels for approximately 20 years.

In 2015, 42 percent of all coal produced in the United States came from publicly owned land, primarily in the Powder River Basin in Wyoming. Between 80 and 90 percent of the coal produced in the United States is used for electricity generation. In recent years there has been a consistent decline in coal-fired electricity generation and, consequently, a decline in coal production. Coal-fired electricity made up 50 percent of US generation in 2005 and by 2015 had declined to 33 percent. Coal production fell from 1.13 billion to less than 0.9 billion tons during this same time period.^{1,2} In 2015, US coal production

¹ US EIA. 2016. 2016 Annual Coal Report. November 3, 2016. Available at <http://www.eia.gov/coal/annual/>

² US EIA. 2012. Coal Rank and Minding Method, 1949-2011. September, 2012. Available at <https://www.eia.gov/coal/data.php#production>

experienced one of the steepest declines in history, and it is projected to decline by an additional 15 percent in 2016.³ Several major coal companies have instituted bankruptcy proceedings. Some of these companies have since emerged or are in the process of emerging from bankruptcy.

The last time the Federal coal program received a comprehensive review was in the mid-1980s, and most of the existing regulations were promulgated in the late 1970s and have been only slightly modified since that time. The direct, indirect, and cumulative impacts of the Federal coal program have not been fully analyzed under the National Environmental Policy Act (NEPA) in over thirty years. This has led to calls from a variety of sources for review of many facets of the program, including return to the American taxpayer, climate change considerations, resource protection mandates, and process efficiency.

The Secretary of the Interior is authorized to lease coal as she finds “appropriate and in the public interest” (30 United States Code [USC], Subsection 201[a][1]). Consideration of the implications of Federal coal leasing for climate change, as an extensively documented threat to the health and welfare of the American people, falls squarely within the factors to be considered in determining the public interest. Moreover, this consideration is critical in the development of land use plans where the Secretary must “weigh long-term benefits to the public against short-term benefits” (43 USC, Subsection 1712[c][7]). Such consideration is an important part of the Secretary’s responsibility under the Federal Land Policy and Management Act (FLPMA) to manage “the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people” (43 USC, Subsections 1701[a][7]; 1702[c]).

When resource extraction from public lands is determined to be appropriate, it is also incumbent upon the Department of the Interior to ensure that the public receives the appropriate compensation for the use of its resources. “No bid [on a coal lease tract] shall be accepted which is less than the fair market value, as determined by the Secretary, of the coal subject to the lease. Prior to his determination of the fair market value of the coal subject to the lease, the Secretary shall give opportunity for and consideration to public comments on the fair market value” (30 USC, Subsection 201[a][1]). This requirement to receive fair market value (FMV) places a floor on the monetary return the public must receive once the Secretary determines that it is appropriate and in the public interest to lease a coal tract. In other words, in determining where, when, and how to lease a coal tract, the Secretary must ensure that the sale of this public resource fairly compensates the public by receiving the highest price a willing seller would realize when leasing to a willing buyer—as would any party seek in selling resources in a commodity market.

³ US EIA. 2016. Short-Term Energy Outlook. December 2016. Available at http://www.eia.gov/outlooks/steo/pdf/steo_full.pdf

ISSUE IDENTIFICATION

In the spring of 2015, Secretary of the Interior Sally Jewell called for “an honest and open conversation about modernizing the Federal coal program.” The Department of the Interior subsequently held listening sessions around the country that summer. Hundreds of individuals attended the hearings in person. The Department heard from 289 individuals during the sessions and received over 94,000 written comments. Through these sessions, the areas of concern to a wide variety of interests became clearer.

As a result, in early 2016 Secretary Jewell issued Secretarial Order 3338 directing the BLM to prepare a Programmatic Environmental Impact Statement (PEIS) under the NEPA to identify and analyze potential leasing and management reforms for the Federal coal program. The PEIS provides the BLM with an efficient and effective tool to consider a wide range of reasonable reform alternatives, evaluate the impacts of those alternatives with a focus on cumulative effects, and provide meaningful opportunities for public engagement to inform future agency decision-making.

This scoping report is the first step in the process of reviewing these complex and interrelated issues. It will be followed by a Draft PEIS that will further analyze and refine the reform options presented here and identify a menu of draft alternatives. Following public comment on that Draft PEIS, a Final PEIS will be produced with a recommended roadmap for reforming the Federal coal program. The final report is expected to be completed in early 2019.

In the spring of 2016, the BLM published a Notice of Intent to prepare a programmatic environmental impact statement to review the Federal coal program and to conduct public scoping meetings. That notice initiated the formal public scoping process for the PEIS, calling for public information and comment. In particular, the Notice of Intent posed questions to the public on the following issues identified as areas of concern in the Secretarial Order:

- How, when, and where to lease
- Fair return
- Climate impacts
- Socioeconomic considerations
- Exports
- Energy needs

The Department of the Interior held six public meetings during the summer of 2016 in all regions of the country, including key areas of Federal coal production. These meetings were attended by about 2,000 people and were also either live-streamed or made available in audio. In addition to oral comments provided at the meetings, about 214,402 written comments (654

unique) were received during the comment period, as well as expert reports and analyses.

Invitations have been extended to 72 potential “Cooperating Agencies” as defined by the NEPA that would function as partners with the BLM in preparing the PEIS. The BLM also has reached out to all federally recognized tribes to determine their interest in formal consultation on the PEIS. An initial meeting with Cooperating Agencies was held on December 13, 2016, and consultation with interested tribes was initiated in the same month.

NATURE OF SCOPING REPORT

This report is the result of the BLM’s review and consideration of the materials and analyses received through the listening sessions, public scoping process, or otherwise available. Based on this review, it appears that modernization of the Federal coal program is warranted. While energy markets, communities, environmental conditions, and national priorities have changed dramatically, the program has remained fairly static in its administration over the last thirty years.

This modernization should focus on ensuring a fair return to Americans for the sale of their public coal resources; addressing the coal program’s impact on the challenge of climate change; and improving the structure and efficiency of the coal program in light of current market conditions, including impacts on communities.

In each of these areas additional analysis is necessary prior to the recommendation of specific policy choices, in order to provide a complete understanding of the likely impacts of various policies on energy markets, electricity prices, employment, and other critically important issues. These issues will be the focus areas of analysis for the PEIS going forward. However, it is possible at this stage in the process to identify the most promising policies for consideration. This report sets out these currently available policy ideas for addressing these important issues, and the additional data and technical work needed to decide specifically how to move forward. In addition, there are some simpler good government improvements that can be made without significant additional analysis which the scoping report outlines as well.

This report provides context for considering reform opportunities, and it presents preliminary reform options and an analytical framework that will form the basis for the PEIS. This report sets out reform options organized by policy objectives that align with the Secretarial Order, and it expands upon the reform options based on input received. This report also identifies reform options received during the scoping process that are not recommended for further analysis and sets out the reasons for those recommendations. The reform options that will be carried forward for further consideration by the BLM include:

Fair Return

- Increase royalty rate
- Implement FMV determination process changes (i.e., transparency and consistency)
- Limit the use and increase the transparency of royalty rate reductions
- Increase rental rate
- Raise minimum bonus bid
- Implement inter-tract or modified inter-tract bidding processes to increase competition among bidders
- Evaluate current performance bonding amounts; increase bonding levels as necessary
- Convene a royalty policy commission

Reduce/Account for Greenhouse Gas Emissions

- Account for carbon-based externalities through royalty rate increase or royalty adder
- Require compensatory mitigation for greenhouse gas emissions
- Lease per a carbon budget
- Create incentives for methane capture
- No new leasing, except for limited lease modifications

Improve Resource Protection and Management

- Improve application of unsuitability criteria; modify criteria as necessary
- Develop strategic leasing plans that address landscape scale issues, multiple use, and mitigation planning
- Account for additional coal-related externalities, such as public health and environmental impacts
- Strengthen lease applicant qualification requirements
- Apply environmental protections to existing leases
- Develop regional mitigation strategies for existing and new coal development to address public health and environmental impacts
- Develop best management practices for resource protection

Increase Lease Process Efficiency

- Develop strategic leasing plans that allow for tiering of future lease decisions
- Create a pre-application process

- Create a standardized lease application form and develop an electronic application platform
- Establish a single team to develop FMV estimates
- Work with other agencies to evaluate means for eliminating overlapping requirements and redundant processes
- Improve transparency in the leasing process

The BLM believes that there are a number of these options that represent more modest reforms that could be combined with almost any combined option package or future alternative, or implemented as standalone actions. These options represent beneficial program modernization activities and good government practices.

For fair return, these include FMV determination process changes aimed at transparency and consistency, limiting the use of royalty rate reductions and improving the transparency associated with the use of royalty rate reductions, rental rate adjustments to reflect inflation, minimum bonus bid adjustments to reflect inflation, and evaluation of current performance bonding amounts. For greenhouse gas emissions, this includes creating incentives for methane capture.

For resource protection and management, this includes strengthening requirements for companies bidding on leases, all of which would require coordination with the Office of Surface Mining Reclamation and Enforcement (OSMRE). These requirements include prohibiting leasing to self-bonded companies, ensuring sufficient financial resources, ensuring companies have not been cited for major violations of environmental regulations in connection with other operations, and verifying companies have been fulfilling reclamation obligations in connection with other operations. It also includes developing best management practices for resource protection and improving planning to avoid land use conflicts, such as through the modification and improved application of unsuitability criteria or through the development of strategic coal leasing plans.

For lease process efficiency, these include standardizing lease application forms, developing an electronic platform for the submission of applications, working with other agencies to evaluate means for eliminating redundant processes, and improving transparency.

At the Secretary's direction in connection with Order 3338, the BLM is in the process of developing guidance to implement several of these improvements. Additional reforms may be implemented prior to completion of the Final PEIS if further analysis supports taking action on a more expedited timeframe.

To demonstrate how the various options could be combined to develop alternatives in the PEIS, the report sets out three possible option combination packages. Because each option presents its own range of analytic issues and

because that complexity may be compounded by interactions among the reform options if they are implemented in combination, additional analysis is needed before these or other combinations of options can be included as alternatives for consideration in the PEIS. The Draft PEIS also will analyze a “no action” and a “no leasing” alternative.

Possible Option Combination Package #1

1. Fair Return

Increase the royalty rate to reflect the fair return for coal produced on Federal land. The BLM would identify the most appropriate metric and corresponding royalty rate for Federal coal, reflecting on analysis already conducted by other groups such as the Council of Economic Advisers (CEA).

2. Climate Change/Resource Protection

Require compensatory mitigation for Federal coal leases. The BLM would require lessees to carry out or fund activities that proportionally offset climate-related impacts, including through investment in a fund managed by an entity that takes on the liability to proportionally offset those greenhouse gas emissions and climate-related impacts. Contribution to the fund would be tied to the units of coal produced. Funds could be used for activities including, but not limited to, carbon offsets, carbon sequestration, climate adaptation, and community resilience.

3. Leasing Process

- a. *Develop strategic leasing plans and utilize modified inter-tract bidding on a \$/ton or \$/British thermal unit (Btu) basis.* Strategic leasing plans would be developed based on regular reviews of projected domestic coal demand (e.g., over a 5-year window) and the role of Federal coal resources in meeting domestic energy needs. These plans would set lease sales on a regular schedule to accommodate a modified inter-tract bidding system. The BLM would determine a maximum tonnage of coal or maximum number of Btus to be leased consistent with projected demands. Under a modified inter-tract leasing process, all interested companies would bid among themselves for the right to produce a specified quantity of coal in the location of their choice, assuming it is suitable for mining and consistent with the approved land use plan and strategic leasing plan. To the extent that auctions become more competitive through the use of modified inter-tract bidding, resulting in increased bonus bids, the need for a higher royalty rate could be revisited on a periodic basis.

- b. *Develop regional mitigation strategies.* Regional mitigation strategies would be developed by the BLM to identify and facilitate compensatory mitigation opportunities at the regional scale, allowing for pre-planning for, and advanced investment in, mitigation opportunities.
- 4. Community Assistance
 - a. *Explore use of compensatory mitigation funds to invest in affected communities experiencing reduced coal production.* The BLM would seek to use compensatory mitigation funds to invest in economic diversification and workforce development efforts.
 - b. *Direct a portion of Federal coal revenues to community assistance.* The BLM would seek to secure Congressional authorization to direct a portion of increased Federal coal revenues toward investments in impacted communities that support economic diversification, job training, mine reclamation, and other community priorities.

Possible Option Combination Package #2

1. Fair Return

Increase the royalty rate to reflect the fair return for coal produced on Federal land. The BLM would identify the most appropriate metric and corresponding royalty rate for Federal coal, reflecting on analysis already conducted by other groups. Because a carbon-based royalty adder, as described under 2, could be instituted in combination with or independent of a potential royalty rate increase based on fair return principles, the BLM will analyze the effects of such changes both individually and cumulatively.

2. Climate Change/Resource Protection

Apply a royalty adder to account for carbon-based environmental and societal costs of coal production and use (\$/ton of coal). A royalty adder would tie climate costs directly to production/consumption. As a price mechanism, a royalty adder would provide price certainty to mining operators and downstream purchasers. A royalty adder would apply only to new and renewed leases and, therefore, would be necessarily phased in over time. The BLM would conduct analysis to identify the most appropriate royalty adder taking into account downstream regulations and substitution effects, and reflecting on analysis already completed by other groups. The BLM would also assess the net impact on revenues from such changes, including any potential reduction in bonus bids and production.

3. Leasing Process

Develop strategic leasing plans and utilize modified inter-tract bidding on a \$/ton or \$/Btu basis. Strategic leasing plans would be developed based on regular reviews of projected Federal coal demand (e.g., over a 5-year window) and could serve a variety of purposes that meet a number of policy objectives, including addressing resource management concerns at a landscape level and helping to streamline future leasing actions. These plans would set lease sales on a regular schedule to accommodate a modified inter-tract bidding system. The BLM would determine a maximum tonnage of coal or maximum number of Btus to be leased consistent with projected demands. Under a modified inter-tract leasing process, all interested companies would bid among themselves for the right to produce a specified quantity of coal in the location of their choice, assuming it is suitable for mining and consistent with the approved land use plan and strategic leasing plan. To the extent that auctions become more competitive through the use of modified inter-tract bidding, resulting in increased bonus bids, the need for a higher royalty rate could be revisited on a periodic basis.

4. Community Assistance

- a. *Direct a portion of Federal coal revenues to community assistance.* The BLM would seek to secure Congressional authorization to direct a portion of increased Federal coal revenues toward investments in impacted communities that support economic diversification, job training, mine reclamation, and other community priorities.
- b. *The states' portion of increased revenues would be available to invest in impacted communities experiencing reduced coal production.* The additional revenues generated by a royalty rate adder would be split with states consistent with current law and could be used by states to support economic diversification efforts in communities and related activities.

Possible Option Combination Package #3

I. Fair Return

Increase the royalty rate to reflect the fair return for coal produced on Federal land. The BLM would identify the most appropriate metric and corresponding royalty rate for Federal coal, reflecting on analysis already conducted by other groups.

2. Climate Change/Resource Protection

- a. *Periodically evaluate and ensure that coal production and associated life-cycle emissions are consistent with the need to reduce net domestic greenhouse gas emissions 80 percent below 2005 levels by 2050.* This

tracks to a straight-line reduction from the US 2025 Intended Nationally Determined Contribution (INDC),⁴ and it is also consistent with the long-term pathway set forth in the US Mid-Century Strategy for Deep Decarbonization.⁵ The BLM would limit the amount of Federal coal leased at a given time based on a carbon budget. The Federal coal leasing levels would be premised on a carbon budget that is commensurate with Federal coal's appropriate contribution to meeting economy-wide greenhouse gas emission reduction targets. In other words, the total amount of coal offered and made accessible under Federal leases would contain lifecycle carbon dioxide (CO₂) emission levels that are less than or equal to the anticipated emissions from Federal coal under an INDC strategy.⁶ The BLM would also need to evaluate the effectiveness of applying INDC-based limits to Federal coal leasing if and when no similar limitations are applied to substitute non-Federal energy sources to address concerns over emissions shifting to non-Federal coal sources. This potential shifting to non-Federal coal sources could reduce the environmental benefit of such limits (i.e., due to emissions leakage).

- b. *Develop strategic leasing plans.* Strategic leasing plans would incorporate the carbon budget and set lease sales on a regular schedule to accommodate a modified bidding system (see 3a below). These strategic plans could help meet a variety of policy objectives, including addressing resource management concerns at a landscape level and helping to streamline future leasing actions.

3. Leasing Process

Use modified inter-tract bidding on a \$/ton or \$/Btu basis. The BLM would determine a maximum tonnage of coal or carbon or maximum number of Btus to be leased consistent with the defined carbon budget. Under a modified inter-tract leasing process, all interested companies would bid among themselves for the right to produce a specified quantity of coal in the location of their choice, assuming it is suitable for mining and consistent with the approved land use plan and strategic leasing plan. To the extent that auctions become more competitive through the use of modified inter-tract

⁴ Actions described by the United States under the UNFCCC in December 2015 to achieve the long-term goals of the Paris Agreement: to hold the increase in global average temperature to well below 2°C, to pursue efforts to limit the increase to 1.5°C, and to achieve net zero emissions in the second half of this century.

⁵ The White House. 2016. US Mid-Century Strategy for Deep Decarbonization. November 2016. Available at https://www.whitehouse.gov/sites/default/files/docs/mid_century_strategy_report-final.pdf

⁶ One way to implement this approach would be for the BLM to use an economy-wide model to estimate least cost compliance strategies for meeting INDCs. The BLM could use the model output to derive anticipated Federal coal consumption levels over a 20-year period, and then use that level, in conjunction with reserves already under lease, as a limit on the amount of reserves that are leased.

bidding, resulting in increased bonus bids, the need for a higher royalty rate could be revisited on a periodic basis.

4. Community Assistance

Direct a portion of Federal coal revenues to investments in communities experiencing economic impacts from reduced coal production. The BLM would seek to secure Congressional authorization to direct a portion of increased Federal coal revenues toward investments in communities that support economic diversification, job training, mine reclamation, and other community priorities.

No Action Alternative

Under the no action alternative, the Federal coal program would continue to be administered in the manner in which it is administered currently. Leasing would be conducted through lease-by-applications (LBAs). The current means of determining FMV, royalty rate reductions, minimum bonus bids, and rental rates would remain unchanged. The no action alternative would not address concerns raised by numerous parties about the Federal coal program, including concerns raised by the Government Accountability Office (GAO), the Department of the Interior's Office of Inspector General (OIG), members of Congress, interested stakeholders, and the public.

No Leasing Alternative

Under a no leasing alternative, the BLM would issue no new leases for Federal coal, except for lease modifications within the defined acreage limitations (960 acres or less⁷). Existing coal already under lease would not be impacted. Administration of existing leases would remain unchanged, including existing royalty rates and rental rates. The BLM may also consider combining the no new leasing alternative with other reform options aimed at modernizing the administration of existing leases as part of separate reform packages or alternatives.

These options and option combination packages are based on the best judgment brought to bear based on the comments received and with the data at hand. The development of the PEIS will involve detailed analysis of these options and option combination packages. Of particular relevance will be analyzing effects on energy markets, the energy economy, communities, and the environment. As additional data becomes available during preparation of the PEIS, these options and option combination packages may be revised.

With this in mind, the key areas of analysis for the PEIS, many of which were identified as priorities by the Secretarial Order, include: return to the taxpayer, climate impacts/greenhouse gas emissions, socioeconomic considerations, energy needs (including coal production and exports, as well as substitution effects), energy prices,

⁷As defined in section 432 of the Energy Policy Act of 2005.

other environmental impacts (e.g., water quality and wildlife), and health impacts. The BLM will use the best available science to support its analyses in the PEIS and employ sophisticated power sector modeling to determine the potential outcomes of options and option combination packages. In conducting this analysis, the BLM will also rely on Cooperating Agency expertise and the thoughtful work completed and underway by stakeholders and the public.

This report is intended to provide an educated starting point for the work on the PEIS, and a path forward for continuing to involve and tap the expertise of the public who care about and know about these public lands and resources.

CHAPTER I

INTRODUCTION

The Bureau of Land Management (BLM) has undertaken scoping as part of its comprehensive review of the Federal coal program and has prepared this scoping report consistent with National Environmental Policy Act of 1969 (NEPA) requirements at Title 40 of the Code of Federal Regulations (CFR), Subpart 1501.7. Scoping is the process by which the BLM solicits internal and external input on the issues, impacts, and potential alternatives that will be addressed in an environmental impact statement (EIS), as well as the extent to which those issues and impacts should be analyzed in the NEPA document.

The objectives of this scoping report are to:

1. Provide an overview of the scoping process for the BLM's Coal Programmatic Environmental Impact Statement (PEIS)
2. Provide a summary of the comments received through the scoping process
3. Provide baseline information regarding the Federal coal program and establish the context in which the BLM will consider potential reform options
4. Present preliminary reform options for the Federal coal program that the BLM will carry forward for further analysis and that may form the basis for the alternatives in the PEIS.
5. Present a preliminary analytical framework for the PEIS

The scoping report is organized into the following chapters:

Chapter 2. Background—Provides background information on the BLM's development of the PEIS, including listening sessions held in 2015, Secretarial Order 3338, and the Notice of Intent.

Chapter 3. Public Involvement and Public Scoping Process—Describes the scoping process undertaken for the PEIS.

Chapter 4. Summary of Comments Received—Provides summaries of the comments received through the scoping process.

Chapter 5. Federal Coal Leasing Program—Describes the Federal coal program and provides baseline information intended to provide context for the BLM's consideration of potential program reform options. This chapter includes: authorities, other Federal agency roles and responsibilities, historical information, state of the coal industry information, coal leasing and production data, market projections for coal, greenhouse gas emissions, socioeconomic considerations, and an overview of the Federal coal leasing process.

Chapter 6. Programmatic Environmental Impact Statement—Provides the BLM's preliminary synthesis of information provided through the scoping process, which will provide the foundation for the Draft PEIS. This chapter includes: a purpose and need statement, preliminary reform options that meet identified policy objectives to be carried forward for further consideration by the BLM, a rationale for dismissing some options from further consideration, a framework for developing program reform alternatives, issues for analysis, an analytical approach, analytical considerations, and a schedule for completion of the PEIS.

CHAPTER 2

BACKGROUND

2.1 INTRODUCTION

The activities that the BLM conducted prior to the initiation of the official NEPA process are described in this chapter.

2.2 LISTENING SESSIONS

On March 17, 2015, Secretary Jewell called for “an honest and open conversation about modernizing the Federal coal program.” As previously described, the last time the Federal coal program underwent comprehensive review was in the mid-1980s, and market conditions, infrastructure development, scientific understanding, and national priorities have changed considerably since that time. The Secretary’s call was also motivated by concerns raised by numerous parties about the Federal coal program, including concerns raised by the Government Accountability Office (GAO)⁸, the Department’s Office of Inspector General (OIG)⁹, members of Congress, interested stakeholders, and the public. The concerns raised by the GAO and OIG centered on whether taxpayers are receiving fair market value (FMV) for leasing Federal coal on public lands. Other commenters raised concerns that the current Federal leasing structure lacks transparency and competition, while also raising questions regarding current market conditions for the coal industry generally and related implications for Federal resources. Stakeholders also questioned whether the leasing program results in over-supply of a commodity that has significant environmental and health impacts, including impacts on global climate change.

⁸ GAO. 2013. Coal Leasing: BLM Could Enhance Appraisal Process, More Explicitly Consider Coal Exports, and Provide More Public Information. GAO 14-140. December 2013. Available at <http://www.gao.gov/products/GAO-14-140>.

⁹ OIG. 2013. Coal Management Program, US Department of the Interior, Report No. CR-EV-BLM-0001-2012. June 2013. Available at <https://www.doi.gov/sites/doi.gov/files/CR-EV-BLM-0001-2012Public.pdf>

In response to the Secretary's call for a conversation to address these concerns, the BLM held five listening sessions regarding the Federal coal program in the summer of 2015. These listening sessions offered the public the opportunity to comment on how the BLM can best carry out its responsibility to ensure that taxpayers receive a fair return for leasing the coal resources managed by the BLM on their behalf. The details of the public listening sessions are provided below in **Table 2-1**. In total, 1,068 individuals attended the listening sessions, and all of the listening sessions were live-streamed. The BLM heard oral comments from 289 individuals during the sessions.

Table 2-1
Listening Sessions

Location	Venue	Date	Number of Attendees
Washington, DC	South Main Interior Building 1951 Constitution Ave. NW	July 29, 2015	114
Billings, Montana	BLM Montana/Dakotas State Office 5001 Southgate Drive	August 11, 2015	365
Gillette, Wyoming	Campbell County Library 2101 South 4-J Road	August 13, 2015	308
Golden, Colorado	Marriott Denver West 1717 Denver West Boulevard	August 18, 2015	161
Farmington, New Mexico	Courtyard Marriott 560 Scott Avenue	August 20, 2015	120
Total			1,068

In coordination with the listening sessions, the BLM collected written input on reform of the Federal coal program. In total, 94,045 submissions were received before the comment period closed on September 17, 2015, as reflected in **Table 2-2**, below. The oral and written comments reflected several recurring themes. First, numerous stakeholders expressed concern that American taxpayers are not receiving a fair return for the leasing of public coal resources. Second, many stakeholders expressed concern that the Federal coal program conflicts with the Administration's climate policy and the country's national climate goals, making it more difficult to achieve those goals. Third, there were numerous and varying concerns raised about the structure of the Federal coal program in light of current market conditions, including how implementation of the Federal leasing program affects current and future coal markets, coal-dependent communities and companies, and the reclamation of mined lands.

Table 2-2
Listening Session Submissions

Type of Written Comment	Number of Submissions	Percent of Total
Form letters from all sources (12 groups)*	92,846	98.7
Written comments submitted at the listening session meetings	1,001	1.1
Other written comments	198	0.2
Total written comments	94,045	100

* Form letter campaigns were initiated by 12 different organizations

2.3 SECRETARIAL ORDER

In response to the broad range of issues raised over the course of the past few years and through the listening sessions, on January 15, 2016, the Secretary of the Interior issued Order No. 3338. The Order directs the BLM to carry out the following:

- 1) A formal, comprehensive review of the Federal coal program through a discretionary programmatic EIS under NEPA;
- 2) A pause on significant new coal leasing decisions on public lands while the programmatic review is underway, with limited, enumerated exemptions and exclusions;
- 3) A series of good government reforms to improve transparency and program administration, including the establishment of a public database to account for the carbon emissions from fossil fuels on public lands by the US Geological Survey (USGS).

The Order states:

“Given the broad range of issues raised over the course of the past year (and beyond) and the lack of any recent analysis of the Federal coal program as a whole, a more comprehensive, programmatic review is in order, building on the BLM’s public listening sessions[.]

...

[T]he purpose of the P[rogrammatic] EIS is to identify, evaluate, and potentially recommend reforms to the Federal coal program. This review will enable the Department to consider how to modernize the program to allow for the continued development of Federal coal resources while addressing the substantive issues raised by the public, other stakeholders, and the Department’s own review of the comments it has received.

...

The PEIS will provide a vehicle for the Department to undertake a comprehensive review of the program and consider whether and how the program may be improved and modernized to foster the orderly development of BLM administered coal on Federal lands in a manner that gives proper consideration to the impact of that development on important stewardship values, while also ensuring a fair return to the American public.”

The Order directs the Director of the BLM to expeditiously initiate the NEPA scoping process by inviting Federal, state, and local agencies; Indian tribes; and the public to help identify the environmental issues and reasonable alternatives to be examined in the PEIS. Upon completion of the scoping process, the Director of the BLM is required to provide a scoping report to the Secretary of the Interior along with a proposed schedule for the completion of the PEIS.

2.4 NOTICE OF INTENT

On March 30, 2016, in accordance with NEPA, the BLM published a Notice of Intent to prepare a programmatic environmental impact statement to review the Federal coal program and to conduct public scoping meetings¹⁰ in the *Federal Register* announcing its intent to prepare a PEIS to review the Federal coal program and beginning the formal scoping period. The Notice of Intent, included as **Appendix A**, announced the city and states of the planned public scoping meetings, stated that specific dates and locations would be announced at least 15 days in advance of each meeting, and listed various methods of commenting.

The Notice of Intent provided background on the Federal coal program, a preliminary set of issues that were expected to be addressed in the PEIS, and potential modifications to the Federal coal program suggested by stakeholders during the listening sessions that could be considered in the PEIS. While the full set of issues to be assessed in the PEIS would be defined through the public scoping process, the Notice of Intent included the following preliminary set of issues:

- How, when, and where to lease
- Fair return
- Climate impacts
- Other impacts
- Socioeconomic considerations

¹⁰ BLM. 2016. Notice of Intent to Prepare a Programmatic Environmental Impact Statement to Review the Federal Coal Program and to Conduct Public Scoping Meetings. *Federal Register* 81(61):17720. March 30, 2016. Available at <https://www.gpo.gov/fdsys/pkg/FR-2016-03-30/pdf/2016-07138.pdf>

- Exports
- Energy needs

These issues were originally identified in the Secretarial Order but expanded to include additional topics and details raised in the listening sessions.

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CHAPTER 3

PUBLIC INVOLVEMENT AND PUBLIC SCOPING PROCESS

3.1 INTRODUCTION

Public involvement entails “the opportunity for participation by affected citizens in rulemaking, decision making, and planning with respect to the public lands, including public meetings or hearings...or advisory mechanisms, or other such procedures as may be necessary to provide public comment in a particular instance” (Federal Land Policy and Management Act (FLPMA), Section 103(d), 43 USC 1702(d)). Council on Environmental Quality (CEQ) regulations and BLM land use planning regulations both provide for specific points of public involvement in the NEPA processes to address local, regional, and national interests (40 CFR 1506.6; 43 CFR Subpart 1610). Guidance for implementing public involvement can be found in the BLM NEPA Handbook H-1790-1¹¹ Public involvement requirements of both NEPA and the FLPMA will be satisfied through this PEIS process.

Scoping is an early and open process for determining the issues to be addressed and identifying the significant issues related to a proposed action (40 CFR 1501.7). Information collected during scoping may also be used to develop the alternatives to be addressed in a NEPA document. The process has two components: internal scoping and external scoping.

The National Environmental Policy Act requires that there be an early and open process for determining the scope of the issues to be addressed by a study.

Internal scoping is the use of the BLM and Cooperating Agency staff to help determine what needs to be analyzed in a NEPA document conducted through

¹¹ BLM. 2008. Handbook H-1790-1—BLM National Environmental Policy Act. Washington, DC. January 2008.

an interdisciplinary process. External scoping is a public process designed to reach beyond the BLM. External scoping involves notification and opportunities for feedback from other agencies, organizations, tribes, local governments, and the public. Its aim is to identify the concerns of high importance to the public. Internal and external scoping help ensure the following:

- That issues are identified early and are properly studied
- That issues of no concern do not consume time and effort
- That the proposed action and alternatives are balanced, thorough, and implementable

The BLM follows the public involvement requirements documented in CEQ regulations implementing NEPA (40 CFR 1501.7 (scoping) and 1506.6 (public involvement)). The BLM also follows public involvement requirements described in the Department of the Interior regulations implementing NEPA (43 CFR, Part 46).

The BLM solicits comments from relevant agencies and the public, organizes and analyzes all comments received, and then distills them to identify issues that will be addressed during the NEPA process. These issues help define the scope of analysis for the EIS and are used to develop alternatives to the proposed action.

A Notice of Intent, an official legal notice published in the Federal Register, announces that a Federal agency is beginning the preparation of an EIS and often includes information about the public scoping process.

3.2 PUBLIC SCOPING

The formal public scoping period began on March 30, 2016, with the publication of a Notice of Intent in the *Federal Register* (see **Chapter 3**, Notice of Intent, included as **Appendix A**).

The Notice of Intent provided an overview of the project and advertised six public scoping meetings. The BLM advertised the scoping meeting locations and times on the project website and through local media, including press releases and newspaper advertisements. A sample newspaper advertisement is included in **Appendix B**, Scoping Materials.

3.3 SUMMARY OF SCOPING MEETINGS

The BLM hosted six public scoping meetings to provide the public with opportunities to learn about the project and the NEPA process and to offer comments. The Notice of Intent announced that the BLM would hold public scoping meetings at locations across the

1,943 individuals attended scoping meetings held in 6 locations throughout the US from May through June 2016.

country. The actual dates, meeting locations and times, and instructions for providing comments were announced via a press release (see **Appendix B**) and the project website: <https://www.blm.gov/programs/energy-and-minerals/coal/coal-peis>. The details of the public scoping meetings are provided in **Table 3-1**, below.

Table 3-1
Public Scoping Meetings

Location	Venue	Date	Live-streamed?	Number of Attendees
Casper, Wyoming	Casper Events Center One Events Drive	May 17, 2016	Yes	268
Salt Lake City, Utah	Salt Palace Convention Center 90 South West Temple	May 19, 2016	No (audio only)	550
Knoxville, Tennessee	Tennessee Theatre 604 South Gay Street	May 26, 2016	No (audio only)	115
Seattle, Washington	Sheraton Seattle Downtown 1400 6th Avenue	June 21, 2016	Yes	309
Grand Junction, Colorado	Avalon Theatre 645 Main Street	June 23, 2016	No (audio only)	354
Pittsburgh, Pennsylvania	Pittsburgh Convention Center 1000 Fort Duquesne Boulevard	June 28, 2016	Yes	47
Total				1,943

Note: Meetings were from 8 a.m. to 4 p.m., except for Casper, which was 8:30 a.m. to 4 p.m., and Pittsburgh, which was 11 a.m. to 7 p.m.

Each meeting began with a two-hour sign-in and speaker sign-up period. During this time, attendees had the opportunity to sign into the meeting and register their contact information for the mailing list. Attendees could also sign up for two-minute speaking slots by getting a speaker card (see **Appendix B**). Speaker cards were numbered sequentially so that attendees would speak in the order that they arrived.

Scoping Meetings included a PowerPoint Presentation with background information on the Federal coal program and an opportunity for public comment on a first-come, first-served basis.

After the registration period, the BLM's contractor, Environmental Management and Planning Solutions (EMPSi), provided welcoming remarks, including an explanation of the meeting format. This was followed by a PowerPoint

presentation given by the BLM (see **Appendix B**). The presentation included background information on the Federal coal program, explained the issues that the PEIS will consider, and provided specific topics for which the BLM is seeking public input. In addition, background information on the reform of the Federal coal program (including a Questions and Answers sheet and Secretarial Order 3338) was provided in handouts (see **Appendix B**).

At the conclusion of the presentation, EMPSi opened the meeting to public comments. Attendees who wished to speak were offered the opportunity according to the number on their speaker cards; these were given out sequentially, on a first-come, first-served basis, determined by sign-in order. Once all speakers with speaker cards had spoken, the BLM offered the opportunity for anyone else to speak. Meetings ended when there were no more attendees who wished to speak.

As noted in **Table 3-2**, below, the meetings in Casper, Seattle, and Pittsburgh were live-streamed. The meetings in Salt Lake City, Knoxville, and Grand Junction were available for listening via a phone conference line. Information on how to access these meetings was made available to the public on the project website.

Table 3-2
Remote Access of Public Scoping Meetings

Location	Live-stream Attendees
Casper, Wyoming	1,102
Seattle, Washington	420
Pittsburgh, Pennsylvania	147
Location	Audio Attendee (number of phone lines)
Salt Lake City, Utah	214
Grand Junction, Colorado	24
Knoxville, Tennessee	93

3.4 TRIBAL CONSULTATION

The United States has a unique legal relationship with American Indian tribal governments as set forth in the Constitution of the United States, treaties, Executive Orders (e.g., Executive Order 13175), federal statutes, federal policy, and tribal requirements, which establish the interaction that must take place between federal and tribal governments. An important basis for this relationship is the trust responsibility of the United States to protect tribal sovereignty, self-determination, tribal lands, tribal assets and resources, and treaty and other federally recognized and reserved rights. Additionally, tribal consultation is required by the National Historic Preservation Act (54 USC 300101, et seq.). Tribal consultation is undertaken by the BLM to identify the cultural values,

religious beliefs, traditional practices, and legal rights of Native American people, which could be affected by the BLM's actions on Federal lands.

Given the national focus of the PEIS and potential for decisions made through the PEIS to impact resources and values of Tribes across the United States, the BLM sent letters to all federally recognized tribes asking if they wanted to consult with the BLM on the PEIS. The BLM sent Tribal consultation invitation letters on October 3, 2016, to 212 tribal entities (see **Table 3-3**) and initiated tribal consultation with interested tribes in December 2016.

Table 3-3
Tribal Consultation Invitees

Tribal Invitee	State
Absentee Shawnee Tribe	OK
Alabama Quassarte Tribal Town	TX
Alabama-Coushatta Tribe	TX
All Indian Pueblo Council	NM
Apache Tribe of Oklahoma	OK
Arctic Slope Regional Corporation	AK
Assiniboine Sioux Tribe	MT
Atqasuk Corporation	AK
Atqasuk Village	AK
Blackfeet Tribal Business Council	MT
Blue Lake Rancheria	CA
Bureau of Indian Affairs	MT
Caddo Nation	OK
Canoncito Navajo Band, Tohajiilee Chapter	NM
Catawa Indian Nation	SC
Cherokee Nation	OK
Cheyenne River Sioux Tribe	SD
Cheyenne-Arapaho Tribes	OK
Chickasaw Nation	OK
Chippewa Cree Tribe	MT
Choctaw Nation of Oklahoma	TX
Citizen Potawatomi Nation	OK
City of Anaktuvuk Pass	AK
City of Atqasuk	AK
City of Barrow	AK
City of Kaktovik	AK
City of Nuiqsut	AK
City of Point Hope	AK
City of Wainwright	AK
Colorado River Indian Tribes	AZ
Comanche Nation	OK
Confederated Salish and Kootenai Tribes	MT
Confederated Tribes of the Gosute Reservation	UT
Cook Inlet Region, Inc.	AK

Table 3-3
Tribal Consultation Invitees

Tribal Invitee	State
Crow Creek Sioux Tribe	SD
Crow Tribe	MT
Cully Corporation, Inc.	AK
Delaware Nation	OK
Delaware Tribe of Indians	OK
Eastern Band of Cherokee Indians	NC
Eastern Shawnee Tribe	MO
Euchee Tribe of Indians	OK
Five Sandoval Indian Pueblos	NM
Flandreau Santee Sioux Tribe	SD
Fort Belknap Indian Community	MT
Fort Mohave Tribe	CA
Fort Peck Tribes	MT
Fort Sill Apache Tribe of Oklahoma	OK
Gila River Indian Community Council	AZ
Hopi Tribal Council	AZ
Inupiat Community of the Arctic Slope	AK
Iowa Tribe of Kansas and Nebraska	KS
Iowa Tribe of Oklahoma	OK
Jena Band Choctow Indians	LA
Jicarilla Apache Nation	NM
Kaktovik Inupiat Corporation	AK
Kansas Kickapoo Tribe	KS
Kaw Nation	OK
Kialegee Tribal Town	OK
Kickapoo Traditional Tribe of Texas	TX
Kickapoo Tribe of Oklahoma	OK
Kiowa Tribe of Oklahoma	OK
Kuukpik Corporation	AK
Little Shell Tribe of Chippewa Indians	MT
Lower Brule Sioux Tribe	SD
Lower Sioux Indian Community	MN
Mescalero Apache Tribe	NM
Miami Nation	OK
Mississippi Band of Choctaw Indians	MS
Modoc Tribe	OK
Morongo Band Mission Indians	CA
Muscogee (Creek) Nation	OK
Naqragmiut Tribal Council	AK
Native Village of Barrow Inupiat Traditional Government	AK
Native Village of Kaktovik	AK
Native Village of Nuiqsut	AK
Native Village of Point Hope	AK
Native Village of Point Lay	AK
Navajo Nation	AZ

Table 3-3
Tribal Consultation Invitees

Tribal Invitee	State
Navajo Nation Council	AZ
Navajo Nation Division of Natural Resources	AZ
Navajo Nation Oil and Gas Company	AZ
Navajo Nation, Aneth Chapter	UT
Navajo Nation, Mexican Water Chapter	AZ
Navajo Nation, Oljato Chapter	UT
Navajo Nation, Red Mesa Chapter	UT
Navajo Nation, Teecnospos Chapter	AZ
Navajo Nation, Alamo Chapter	NM
Navajo Nation, Baahaali Chapter	NM
Navajo Nation, Baca/Prewitt Chapter	NM
Navajo Nation, Becenti Chapter	NM
Navajo Nation, Beclabito Chapter	NM
Navajo Nation, Burnham Chapter	NM
Navajo Nation, Casamero Lake Chapter	NM
Navajo Nation, Chichiltah Chapter	NM
Navajo Nation, Churchrock Chapter	NM
Navajo Nation, Counselor Chapter	NM
Navajo Nation, Coyote Canyon Chapter	NM
Navajo Nation, Crownpoint Chapter	NM
Navajo Nation, Crystal Chapter	NM
Navajo Nation, Gadii ahi/To'Koi Chapter	NM
Navajo Nation, Hogback Chapter	NM
Navajo Nation, Huerfano Chapter	NM
Navajo Nation, Iyanbito Chapter	NM
Navajo Nation, Lake Valley Chapter	NM
Navajo Nation, Little Water Chapter	NM
Navajo Nation, Manuelito Chapter	NM
Navajo Nation, Mariano Lake Chapter	NM
Navajo Nation, Mexican Springs Chapter	NM
Navajo Nation, Minerals Department	AZ
Navajo Nation, Nageezi Chapter	NM
Navajo Nation, Nahodishgish Chapter	NM
Navajo Nation, Naschitti Chapter	NM
Navajo Nation, Nenahnezad Chapter	NM
Navajo Nation, Newcomb Chapter	NM
Navajo Nation, Ojo Encino Chapter	NM
Navajo Nation, Pinedale Chapter	NM
Navajo Nation, Pueblo Pintado Chapter	NM
Navajo Nation, Ramah Chapter	NM
Navajo Nation, Red Lake #18 Chapter	NM
Navajo Nation, Red Rock Chapter	NM
Navajo Nation, Rock Springs Chapter	NM
Navajo Nation, San Juan Chapter	NM
Navajo Nation, Sanostee Chapter	NM

Table 3-3
Tribal Consultation Invitees

Tribal Invitee	State
Navajo Nation, Sheepsprings Chapter	NM
Navajo Nation, Shiprock Chapter	NM
Navajo Nation, Smith Lake Chapter	NM
Navajo Nation, Standing Rock Chapter	NM
Navajo Nation, Thoreau Chapter	NM
Navajo Nation, Toadlena/Two Grey Hills Chapter	NM
Navajo Nation, Tohatchi Chapter	NM
Navajo Nation, Torreon Chapter	NM
Navajo Nation, Tsayatoh Chapter	NM
Navajo Nation, Twin Lakes Chapter	NM
Navajo Nation, Upper Fruitland Chapter	NM
Navajo Nation, Whitehorse Lake Chapter	NM
Navajo Nation, Whiterock Chapter	NM
Navajo Utah Commission	UT
National Council of American Indians (NCAI)	Washington, DC
Nez Perce Tribe	ID
North Slope Borough	AK
Northern Arapahoe Nation	WY
Northern Cheyenne Tribe	MT
Nunamiut Corporation, Inc.	AK
Oglala Sioux Tribe	SD
Ohkay Owingeh	NM
Olgoonik Corporation	AK
Osage Nation	OK
Otoe-Missouria Tribe	OK
Ottawa Tribe	OK
Pala Band Mission Indians	CA
Pamunkey Tribe	VA
Pawnee Nation of Oklahoma	OK
Peoria Tribe of Indians	OK
Poarch Band of Creek Indians	AL
Ponca Nation	OK
Prairie Band Potawatomi Nation	KS
Pueblo of Acoma	NM
Pueblo of Cochiti	NM
Pueblo of Isleta	NM
Pueblo of Jemez	NM
Pueblo of Laguna	NM
Pueblo of Nambe	NM
Pueblo of Picuris	NM
Pueblo of Pojoaque	NM
Pueblo of San Felipe	NM
Pueblo of San Ildefonso	NM
Pueblo of Sandia	NM
Pueblo of Santa Ana	NM

Table 3-3
Tribal Consultation Invitees

Tribal Invitee	State
Pueblo of Santa Clara	NM
Pueblo of Santo Domingo	NM
Pueblo of Taos	NM
Pueblo of Tesuque	NM
Pueblo of Zia	NM
Pueblo of Zuni	NM
Pyramid Lake Paiute Tribe	NV
Quapaw Tribe	OK
Quechan Tribe	AZ
Rosebud Sioux Tribe of Indians	SD
Sac & Fox Nation of Missouri in Kansas & Nebraska	KS
Sac and Fox Tribe	OK
Salt River-Pima Maricopa Indian Community	AZ
San Carlos Apache Tribe	AZ
Santee Sioux Tribe of Nebraska	NE
Seminole Nation	OK
Seminole Tribe of Florida	FL
Seneca-Cayuga Tribe	OK
Shawnee Tribe	OK
Shoshone Bannock Tribes	ID
Shoshone Tribe of Wind River Indian Reservation	WY
Sisseton-Wahpeton Oyate Tribes	SD
Soboba Band Mission Indians	CA
Southern Ute Tribe	CO
Spirit Lake Sioux Nation	ND
Standing Rock Sioux Tribe	ND
Thlopthlocco Tribal Town	OK
Three Affiliated Tribes: Mandan, Hidatsa, and Arikara Nation	ND
Tikigak Corporation	AK
Tohono O'Odham Nation of Arizona	AZ
Tonkawa Tribe	OK
Turtle Mountain Band of Chippewa	ND
Ukpeagvik Inupiat Corporation	AK
United Keetoowah Band of Cherokees	OK
Ute Indian Tribe	UT
Ute Mountain Ute	CO
Wainwright Traditional Council	AK
White Mesa Ute Administration	UT
White Mountain Apache Tribe	AZ
Wichita & Affiliated Tribes	OK
Wyandotte Nation	OK
Yankton Sioux Tribe Bus. & Claims Committee	SD
Ysleta del Sur Pueblo	TX
Total number of Tribal invitations: 212	

3.5 COOPERATING AGENCIES

The Cooperating Agency role derives from NEPA, which calls on Federal, state, and local governments to cooperate with the goal of achieving “productive harmony” between humans and their environment (42 USC, Sections 4321-4347). The CEQ regulations that implement NEPA authorize the lead Federal agency to invite State, local, and tribal governments, as well as other Federal agencies, to serve as Cooperating Agencies in the preparation of environmental impacts statements (40 CFR, Subparts 1501.5, 1501.6).

The Cooperating Agency relationship is distinctive, moving beyond consultation to engage officials and staff of other agencies and levels of government in working partnerships. The Cooperating Agencies share skills and resources to help shape the BLM environmental analyses to better reflect the policies, needs, and conditions of their jurisdictions and the citizens they represent. The benefits of enhanced collaboration among agencies in preparing NEPA analyses are as follows:

- Disclosing relevant information early in the analytical process
- Applying available technical expertise and staff support
- Avoiding duplication with other Federal, state, tribal, and local procedures
- Establishing a mechanism for addressing intergovernmental issues

State agencies, local governments, tribal governments, and other Federal agencies may serve as Cooperating Agencies. Cooperating Agency eligibility is defined as any Federal agency other than a lead agency that has jurisdiction by law or special expertise with respect to any environmental impact. A state or local agency with similar qualifications may be a Cooperating Agency. When the effects are on a reservation, an Indian tribe may by agreement with the lead agency become a Cooperating Agency (40 CFR, Subpart 1508.5).

“Jurisdiction by law” means agency authority to approve, veto, or finance all or part of the proposal (40 CFR, Subpart 1508.15). “Special expertise” means statutory responsibility, agency mission, or related program experience (40 CFR, Subpart 1508.26).

In accordance with 40 CFR, Subpart 1501.6, the BLM requested participation of Cooperating Agencies in the preparation of the PEIS. This included Federal agencies with jurisdiction by law or special expertise. In addition, the BLM invited state government representation from those states and counties where active coal leases exist. The BLM invited a total of 72 agencies that were eligible for Cooperating Agency status. The BLM requested a response by October 26, 2016. **Table 3-4** lists the Federal, state and local agencies that were invited as Cooperating Agencies.

**Table 3-4
Cooperating Agency Invitees**

Federal Invitees
Fish and Wildlife Service
Office of Surface Mining Reclamation and Enforcement
Bureau of Ocean Energy Management
Environmental Protection Agency
US Forest Service
Bureau of Indian Affairs
Office of Valuation Services
Energy Information Administration
Office of Natural Resources Revenue
National Park Service
US Geological Survey
<i>Total invitations sent to Federal entities: 11</i>
State Invitees
Alabama
Arkansas
Colorado
Kentucky
Montana
North Dakota
New Mexico
Ohio
Oklahoma
Utah
Washington
West Virginia
Wyoming
<i>Total invitations sent to state entities: 13</i>
County Invitees
Jefferson County, Alabama
Tuscaloosa County, Alabama
Walker County, Alabama
Scott County, Arkansas
Sebastian County, Arkansas
Delta County, Colorado
Garfield County, Colorado
Gunnison County, Colorado
Las Animas County, Colorado
Moffat County, Colorado
Rio Blanco County, Colorado
Routt County, Colorado
Clay County, Kentucky
Floyd County, Kentucky
Leslie County, Kentucky
Big Horn County, Montana
Fallon County, Montana
Musselshell County, Montana

**Table 3-4
Cooperating Agency Invitees**

Richland County, Montana
Rosebud County, Montana
McLean County, North Dakota
Mercer County, North Dakota
Williams County, North Dakota
McKinley County, New Mexico
San Juan County, New Mexico
Morgan County, Ohio
Perry County, Ohio
Haskell County, Oklahoma
Latimer County, Oklahoma
Le Flore County, Oklahoma
Carbon County, Utah
Emery County, Utah
Kane County, Utah
Salt Lake County, Utah
Sanpete County, Utah
Sevier County, Utah
Lewis County, Washington
Wayne County, West Virginia
Campbell County, Wyoming
Carbon County, Wyoming
Converse County, Wyoming
Lincoln County, Wyoming
Sweetwater County, Wyoming
Uinta County, Wyoming
Total invitations sent to county entities: 48
Total invitations sent: 72

In accordance with the Department of the Interior regulations implementing NEPA, the BLM must consider any request by an eligible government entity to participate as a Cooperating Agency (43 CFR, Subpart 46.225[c]). The request must be evaluated against Cooperating Agency eligibility criteria—jurisdiction by law or special expertise. Note that Campbell County, Wyoming, and the State of Wyoming requested to be Cooperating Agencies in their scoping comment letters; these groups were also included on the invitation list.

All designated Cooperating Agencies will sign memoranda of understanding with the BLM. The BLM held an initial meeting with Cooperating Agencies in December 2016.

3.6 FUTURE PUBLIC INVOLVEMENT ACTIVITIES

Future public involvement for this NEPA effort includes public review and comment on the Draft PEIS and public review of the Final PEIS. The BLM will continue to conduct public outreach via newsletters, news releases, the project website, and other media throughout the PEIS process.

CHAPTER 4

SUMMARY OF COMMENTS RECEIVED

4.1 COMMENT ANALYSIS PROCESS

All written submissions postmarked or received on or before September 15, 2016, are documented in this scoping summary report. Submissions received after this date are not incorporated in this report, but these and any other comments received throughout the PEIS process will be considered in the development of the PEIS and alternatives formulation, as appropriate.

Written comments were collected via the following methods:

- Project e-mail account at BLM_WO_Coal_Program_PEIS_Comments@blm.gov
- E-mail account at blm_wo_coal_comments@blm.gov
- US Postal Service
- Delivered in person at public scoping meetings or to the Washington, DC office of BLM

The most common format used for submissions was e-mail. A list of commenters is provided in **Appendix C**, List of Commenters.

The public could also provide verbal comments at the scoping meetings, which were documented by a court reporter. A transcript of all verbal comments was provided for each meeting, and these comments were also considered in the comment analysis process.

The BLM screened each written submission to determine if it was a form letter or a unique submission. Form letters are typically created by an organization and then circulated to individuals for submittal to the BLM. Unique submissions are those with distinct, unique text and not part of a form letter. The BLM worked

with representatives from organizations initiating form letter campaigns to ensure that all copies of form letters were received.

A copy of all unique submissions and a representative copy of each form letter were made available for public review on the project website on September 29, 2016.

All unique submissions were assigned a submission tracking identifier and commenter information, and submission text was entered into a comment analysis database. The text of each unique submission was then reviewed to determine if it contained substantive comments. Although all comments received through the scoping process have been considered by the BLM, substantive comments are defined in the BLM NEPA Handbook (Section 6.9.2.1) as comments that do one or more of the following:

- Raise issues that the BLM has not considered or reinforce issues that the BLM has already identified
- Present data or information that can be used when developing alternatives
- Present reasonable alternatives or reform options
- Present data or information that the BLM can use when it considers the impacts of the alternatives
- Raise concerns using reasoning; they may include concerns regarding public land resources, BLM-administered lands, or mineral estate in the project area

In accordance with the BLM NEPA Handbook (Section 6.9.2.1), comments that are not considered substantive include:

- Those in favor of or against an action without any reasoning, such as “I don’t like _____,” without providing any rationale
- Those without justification or supporting data, such as “allow more development”
- Those that provide background supporting information not directly related to the action

All substantive comments were categorized according to issue topic categories, as detailed below. Details for unique submissions are included below, in **Section 4.2**, Summary of Unique Submissions, followed by information on form letters and petitions received in **Section 4.3**, Form Letter Summary.

The BLM received 1,118 unique submissions via email, mail, and at public meetings.

Information from these comments, including key issues, data, and other information from the public, was queried to prepare this scoping summary report.

4.2 SUMMARY OF UNIQUE SUBMISSIONS

The BLM received 1,118 unique submissions out of 214,866 total submissions. **Table 4-1** and **Figure 4-1**, below, show the submission methods for the unique submissions. Of the 1,118 unique submissions, most were comments offered verbally at the public meetings (41.5 percent of total submissions), followed by comments submitted by e-mail (37.9 percent of total submissions). When multiple copies of a submission were received from different sources (e.g., submitted via e-mail and mail) only the original copy was included in the totals.

Table 4-1
Submissions by Methods of Submittal

Submission Method	Count	Percent of Total
E-mail	424	37.9
Mail	47	4.2
Paper copy submitted at a public meeting	183	16.4
Public meeting transcript	464	41.5
Total Submissions	1,118	100

Note: Includes unique submissions only

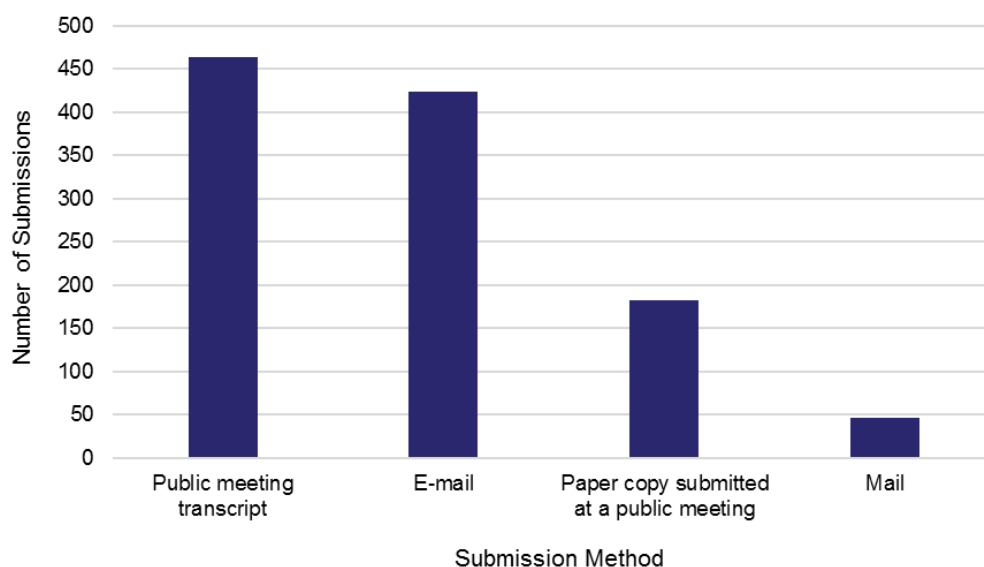


Figure 4-1. Submissions by Methods of Submittal Count

Figure 4-2 and **Table 4-2**, below, show the affiliation for each submission. Most submissions (68.5 percent) were provided by individuals, followed by organizations (nonprofit and citizen's groups; 18.0 percent). Letters received via mail or e-mail were considered to represent an organization, government, or other group when commenters signed them using official titles from these groups. (Note that speakers at the public scoping meeting often cited affiliation with organizations or other groups, and their comments were therefore classified as representing these groups. The BLM recognizes that these commenters may not be official representatives of these groups, so submissions from organizations may be over-represented.) **Appendix C**, List of Commenters, includes the organization affiliation, if provided, by commenters. The 1,118 unique submissions were submitted by 1,239 commenters.¹²

Table 4-3 and **Figure 4-3**, below, show the location of commenters by state for unique submissions; 309 commenters (25.5 percent) did not provide state location information. Most of these commenters submitted their comments by e-mail and, therefore, did not have location information associated with their entry. Of the commenters who did provide location information, most were from Washington (15.0 percent), followed by Colorado (12.6 percent). The largest numbers of commenters were from those locations where public meetings were held and very well attended, with the exception of the state of Montana.

Table 4-2
Submissions by Affiliation

Affiliation	Count	Percent of Total
Anonymous	1	0.1
Elected official	20	1.8
Federal government	8	0.7
Individual	766	68.5
Local government	34	3.0
Organization (nonprofit or citizens groups)	201	18.0
Private industry	57	5.1
State government	21	1.9
Trade group	7	0.6
Tribal government	3	0.3
Total Submissions	1,118	100

Note: Includes unique submissions only

¹² There are more commenters than submissions because some submissions had multiple commenters associated with them.

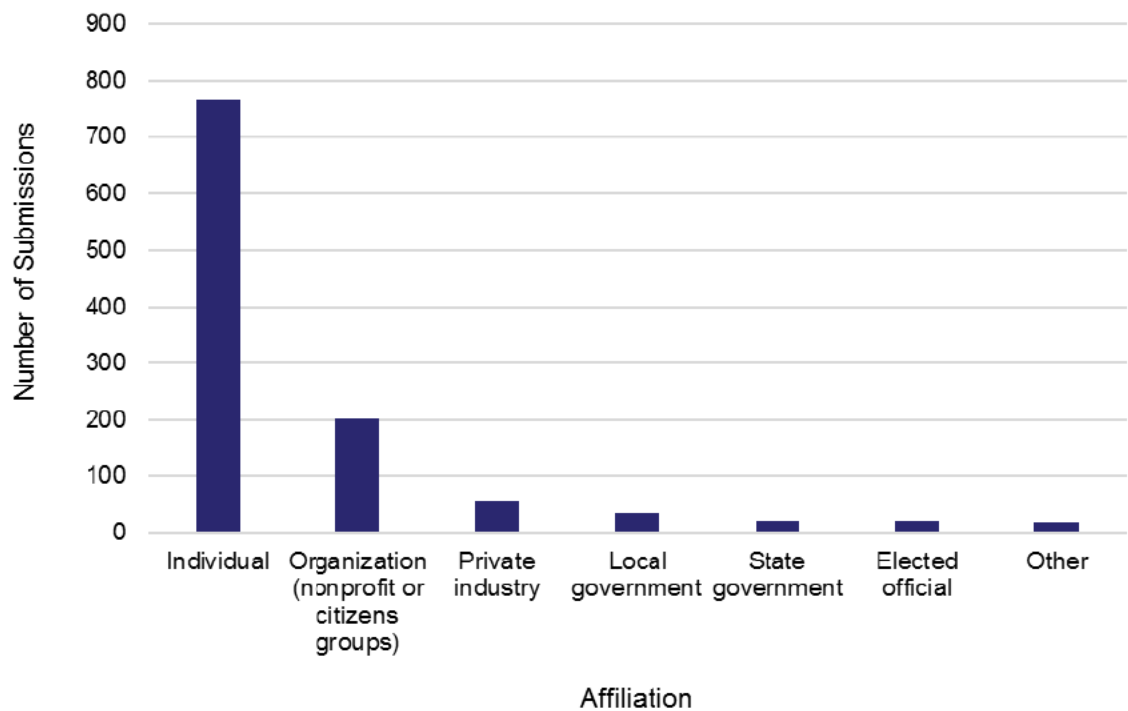


Figure 4-2. Submissions by Affiliation

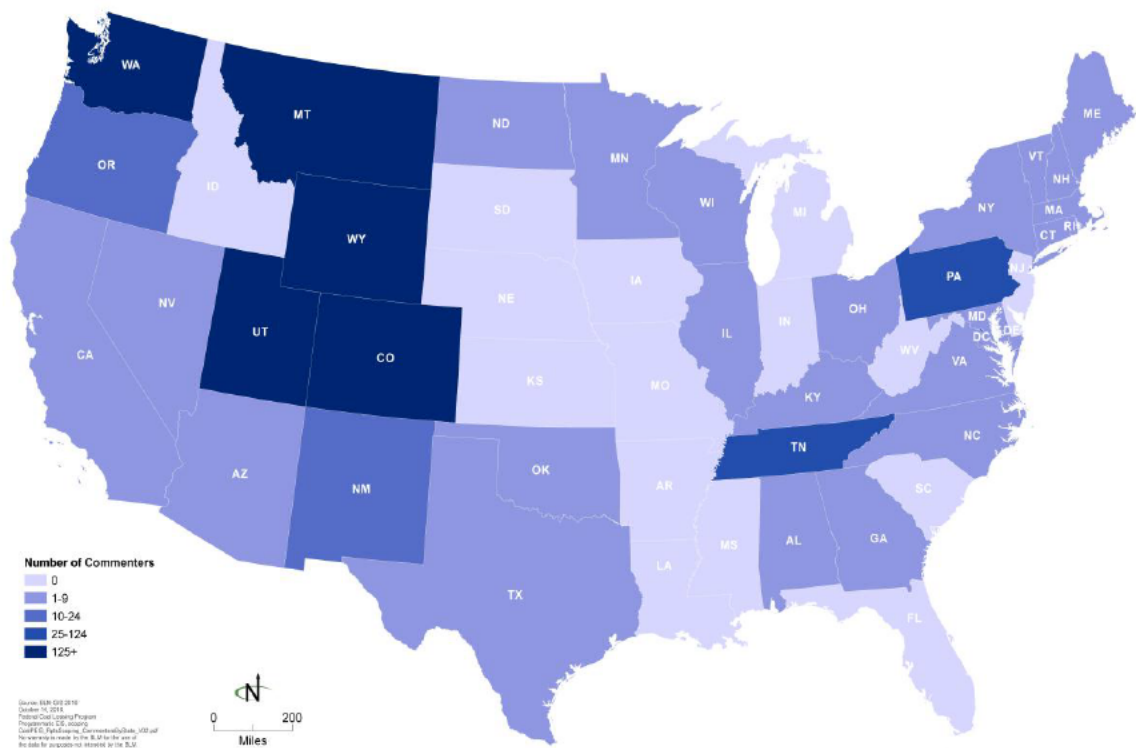


Figure 4-3. Commenters by Geographic Area

Table 4-3
Commenters by Geographic Area

Location	Number of Commenters	Percentage of Total Commenters
Alabama	6	0.5
Arizona	3	0.2
California	7	0.6
Colorado	156	12.6
Connecticut	1	0.1
Georgia	1	0.1
Illinois	3	0.2
Kentucky	9	0.7
Maine	1	0.1
Maryland	2	0.2
Massachusetts	1	0.1
Minnesota	1	0.1
Montana	147	11.9
Nevada	2	0.1
New Hampshire	1	0.1
New Mexico	10	0.8
New York	7	0.6
North Carolina	2	0.2
North Dakota	4	0.3
Ohio	2	0.2
Oklahoma	1	0.1
Oregon	17	1.4
Pennsylvania	25	2.0
Rhode Island	1	0.1
Tennessee	38	3.1
Texas	4	0.3
Utah	131	10.6
Vermont	1	0.1
Virginia	7	0.6
Washington	182	14.7
Washington, DC	16	1.3
West Virginia	1	0.1
Wisconsin	2	0.2
Wyoming	138	11.1
No state information provided	309	25.0
Total Commenters	1,239	100

Note: Includes unique submissions only. Some submissions had more than one commenter.

4.3 FORM LETTER SUMMARY

In addition to unique submissions, organizations submitted form letters. In total, the BLM received 213,748 form letter submissions from 19 form letter campaigns; details of the form letter submissions are shown in **Table 4-4**, below.

The BLM received over 213,000 copies of form letters in 19 form letter campaigns

A representative example of each form letter was entered into the comment analysis database and substantive comments were categorized as described for unique submissions. Letters that represented slight variations of the form letter without significant additional information were treated as form letters. When additional substantive comments were added to the form letter, these letters were entered into the comment-tracking database as a form letter with added text. The additional substantive comments were categorized according to issue topic categories, as described for unique submissions.

Table 4-4
Form Letter Submissions

Initiating Organization	Number of Submissions
American Coalition for Clean Coal Electricity	1,416
Care 2 Petitions	24,102
Center for Biological Diversity	14,104
Count on Coal MT	675
EarthJustice	36,907
Friends of the Earth and Friends of the Earth Action	9,816
Grand Junction meeting -North Fork Valley Letter	43
Keep Electricity Affordable.org	499
National Wildlife Federation	12,538
NextGen Climate Change	1,552
Physicians for Social Responsibility	1,351
The Sierra Club	98,603
The Wilderness Society	10,518
Unknown- maximize returns on Federal coal	27
Unknown- concerns with increased royalty rates	9
Unknown- reconsider the increase in royalty rates	19
Western Organization of Resource Councils	366
Western Values Project	713
WildEarth Guardians	490
Total submissions	213,748

Note: The initiating organizations were identified for all but 3 of the form letters. For letters where no organization was identified, a description of the main letter content is included above.

Petitions were also submitted to the BLM. A petition is a letter typically circulated by an organization and then signed by multiple individuals. In total, the BLM received 91,567 signatures from five petition campaigns; details of petition submissions are included in **Table 4-5**, below. For submissions where an initiating organization was identified, this organization is included. In two instances, no organization was identified; these entries are marked as “unknown.”

Table 4-5
Petition Submissions

Initiating Organization	Number of Signatures
Care2 Petition	2,369
The Climate Reality Project	41,987
The Sierra Club	43,559
Unknown	286
Unknown	3,366
Total submissions	91,567

4.4 SUMMARY OF COMMENTS

The BLM classified all substantive comments under an identified issue category (note some comments were categorized into more than one issue category) and also tagged comments if they contained references or data or a policy option for consideration. In total, 459 comments contained a reference or data and 130 contained a policy option.

In total, 459 comments contained a reference or data, 130 contained a policy option, and 3,199 related to an issue category.

The BLM identified 33 issue categories relevant to the reform of the Federal coal program. Issue categories were developed based on topics identified in the Notice of Intent and traditional BLM resource topics. The issue categories can be found in **Table 4-6**, below.

Table 4-6 and **Figure 4-4**, Comments by Issues Category, below, show the number and percentage of comments received by issue category. The BLM categorized 3,199 comments in total. The largest number of comments (14.6 percent) was assigned to the fair return/coal revenue category. Other significant categories included socioeconomics (14.0 percent), climate change (8.6 percent), and general comments on coal (8.7 percent). **Section 4.6**, Comment Summaries, provides a detailed analysis of the comments received for each issue category.

Table 4-6
Comments by Issue Category

Issue Category	Number of Comments	Percentage of Issue Comments
1. NEPA process		
1.1 Scoping meeting	23	0.7
1.2 Cooperating Agency relationship	11	0.3
1.3 Range of alternatives	59	1.8
1.4 Other general	151	4.7
2. Air quality	52	1.6
3. Climate change	276	8.6
4. Carbon/greenhouse gas emissions		
4.1 Social cost of carbon	125	3.9
4.2 Carbon capture	16	0.5
4.3 Life cycle emissions	27	0.8
4.4 National carbon reduction goals	109	3.4
5. Coal program topics		
5.1 General comment on coal	278	8.7
5.2 Coal land use planning decisions	33	1.0
5.3 Coal leasing pause	104	3.3
5.4 Specific coal lease application	17	0.5
5.5 Coal leasing process	205	6.4
5.6 Coal bonding	75	2.3
5.7 Fair return/coal revenues	466	14.6
5.8 Coal exports	72	2.3
5.9 Coal reclamation	107	3.3
5.10 Coal mitigation	35	1.1
5.11 Coal transportation/rights-of-way	17	0.5
5.12 Methane capture	11	0.3
5.13 Surface owner rights	12	0.4
6. Environmental justice	18	0.6
7. Public health and safety	124	3.9
8. Socioeconomics	449	14.0
9. Tribal interests and concerns	18	0.6
10. State's interests and concerns	15	0.5
11. Visual resources	2	0.1
12. Water resources	40	1.3
13. Biological resources	91	2.8
14. Other resource impacts	33	1.0
15. Renewable Energy	128	4.0
Total Comments	3,199	100

Note: Some comments were coded in more than one category.

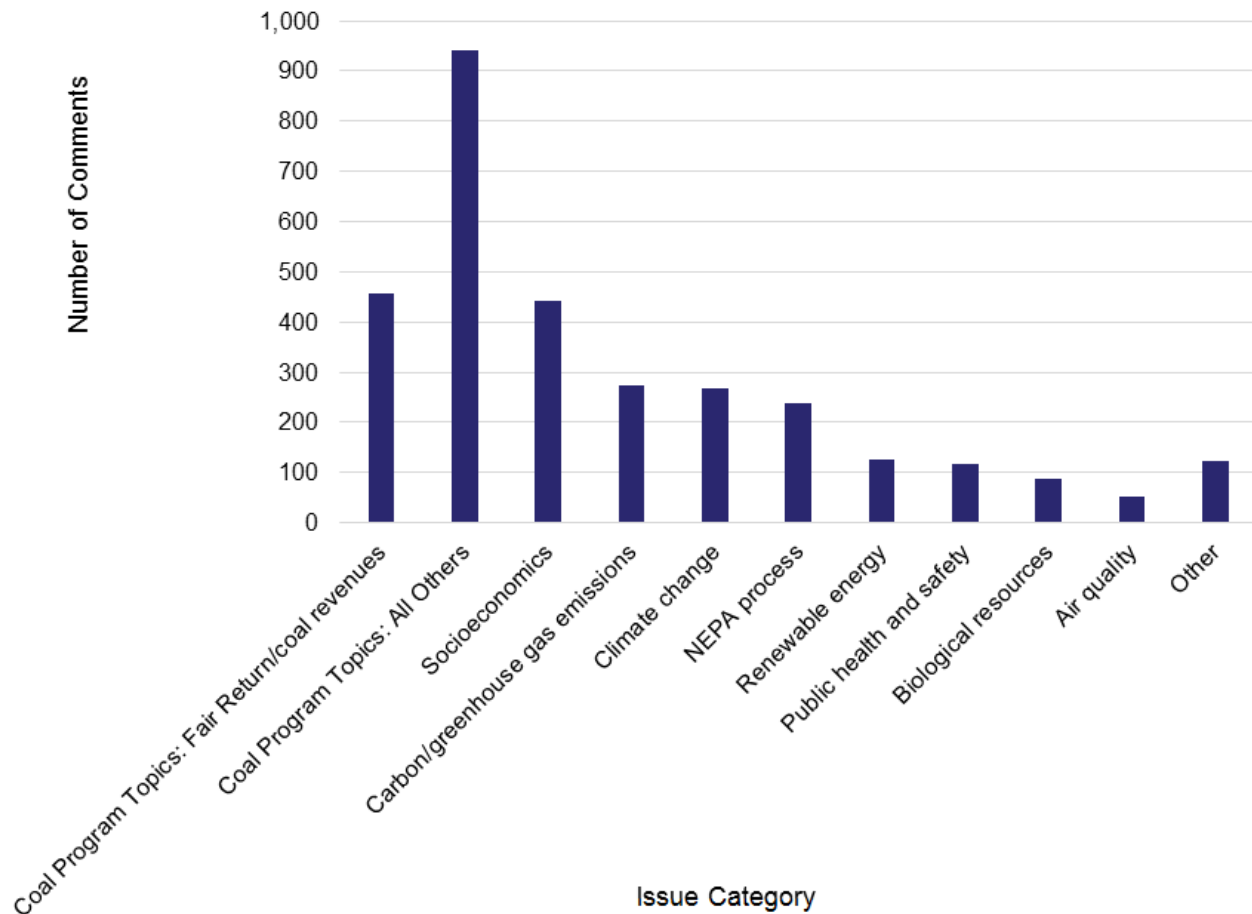


Figure 4-4. Comments by Issues Category

4.5 ISSUES TO BE ADDRESSED PER THE NOTICE OF INTENT

As noted in **Section 2.4**, the Notice of Intent identified issues likely to be addressed in the PEIS. A cross-walk¹³ of issue codes and issue topics identified in the Notice of Intent is included in **Table 4-7**. Comments related to the procedural requirements of the NEPA process did not correspond directly with the Notice of Intent issue topics and are not included here. Some comment issues fell within more than one Notice of Intent issue topic.

¹³ Table showing the relationship between two other tables.

Table 4-7
Issue Cross-Walk

Notice of Intent Issue	Comment Issue Category
How, when, and where to lease	5.2. Coal Land Use Planning Decisions, 5.4. Specific Coal Lease Applications, 5.5. Coal Leasing Process, 5.6. Coal Bonding, 5.9. Coal Reclamation, 5.13. Surface Owner Rights
Fair return	4.1. Social Cost of Carbon, 5.5. Coal Leasing Process, 5.7. Fair Return/Coal Revenues
Climate impacts	3. Climate Change, 4.1. Social Cost of Carbon, 4.2. Carbon Capture, 4.3. Life Cycle Emissions, 4.4. National Carbon Reduction Goals, 5.12. Methane Capture
Other impacts	2. Air Quality, 5.11. Coal Transportation, 7. Public Health and Safety, 9. Tribal Interests and Native American Religious Concerns, 10. State's Interests and Concerns, 11. Visual Resources, 12. Water Resources, 13. Biological Resources, 15. Other Resource Impacts
Socioeconomic Considerations	4.1. Social Cost of Carbon, 6. Environmental Justice, 8. Socioeconomics
Exports	5.8 Coal Exports
Energy needs	5.1. General Comments on Coal, 5.3. Coal Leasing Pause, 15. Renewable Energy

4.6 COMMENT SUMMARIES

The following sections include a summary of the comments received organized by comment type and issue category. A complete listing of comments can be found in **Appendix D**, Comments by Issue Category.

4.6.1 Data and References

The BLM received approximately 449 comments that included data for consideration or citations to references for review. In addition, many commenters attached reference materials, white papers, or other data to their submissions for review. The BLM has considered this information in the development of this Scoping Report and will conduct an in-depth review of this information as part of the development of the PEIS, as relevant. To aid review of this material, the agency has compiled an annotated bibliography, providing an overview of the recommended literature and other documents (see **Appendix E**, Annotated Bibliography).

4.6.2 Policy Options

Approximately 130 comments suggested options for updating or revising Federal coal leasing and permitting policies. Many commenters suggested options for ensuring a fair return to taxpayers from Federal coal leasing. Examples of these options included updating the process and factors for the BLM's determinations of FMV, increasing or decreasing the royalty rate, updating the process and factors for setting bonus bid amounts, and changing the BLM's leasing process to increase competition. Additional comments suggested options for updating the Federal coal program to help achieve US

carbon emission reduction goals. Options suggested to meet this objective included quantifying greenhouse gas emissions and the social cost of carbon, limiting the amount of Federal coal leased according to a carbon budget, using Federal revenues to incentivize clean energy technologies, and requiring mitigation of climate impacts. Some commenters advocated for increasing coal exports, while others suggested that exporting Federal coal should not be allowed.

Other commenters suggested options for improving protection and management of public lands in the coal program, such as updating the coal unsuitability criteria, increasing mitigation requirements, strengthening bonding requirements, and increasing reclamation requirements. Some commenters submitted options for facilitating the economic transition of communities currently dependent on Federal coal development. These options included ideas for allocating Federal funding to support programs like community services, career re-training, and miner pensions. Some commenters suggested that the BLM end the coal leasing program altogether, while others suggested streamlining the leasing program to maximize leasing.

Table 6-1, Options Proposed for Analysis by Policy Objective, outlines the reform options that the BLM is proposing to carry forward for analysis in the PEIS and use as the basis for alternatives development. The options are organized by the policy objectives described in the Need for Federal Action in **Section 6.1.1**. Some options suggested by commenters are not proposed to be carried forward for analysis in the PEIS. **Chapter 5** explains the BLM's rationale for eliminating these options from further consideration.

4.6.3 Issue 1 NEPA Process

Scoping Process

Commenters expressed concern over the locations of the scoping meetings. They stated that meetings should be held in states and communities where coal mining occurs. Specifically, additional meetings were requested in Wyoming and Montana. Some commenters also felt that meetings should be held in areas likely to feel the impacts of climate change. In addition, some commenters stated that the "first-come, first-served" system used at meetings did not allow everyone an opportunity to speak.

Cooperating Agency Relationship

Commenters stressed the importance of including local governments and other Department of the Interior agencies as cooperators during the NEPA process. Specifically, Campbell County, Wyoming, and the State of Wyoming requested Cooperating Agency status.

Range of Alternatives

Commenters suggested many different alternatives and their elements to consider during the PEIS process. Some suggestions included no new Federal

coal leasing, reduction in royalty rates, greenhouse gas mitigation and reduction, new leasing framework, a no action alternative, a transition to renewable energy, and consideration of the social cost of carbon in royalty rates.

One commenter stated that the BLM should consider a true range of alternatives, rather than setting up alternatives at extreme ends of the spectrum. Another commenter stated that a no action alternative would be inconsistent with current climate change policy and that it should be rejected.

NEPA Process—Other General

Commenters expressed concern over the purpose and need for the BLM's reform of the Federal coal program. Some stated that rationale for program review is unfounded and current regulations are adequate, and the BLM has denied reasons for review in the past. Other commenters stated that the PEIS is appropriate and that the program is due for a reform.

Commenters noted the following specific concerns:

- Evaluation of the coal program at a landscape level is redundant, because federally mined coal already includes NEPA at multiple stages.
- In recently completed reviews, the Inspector General of the Department of the Interior and the GAO had only modest recommendations to improve the coal management program, and there were not enough to suggest a PEIS.
- The BLM does not have the authority to reform the Federal coal program, because other laws and agencies have set the regulations. Specifically, commenters argued that the Mineral Leasing Act requires that coal should be mined for maximum economic recovery, that the BLM does not have the authority to adjust mineral royalty rates, and that fees or taxes that apply to the sale of coal into export markets violate the Export Clause of the Mineral Leasing Act.

Commenters also noted a concern that interim actions undertaken by the DOI might prejudice the ultimate decision. Additional immediate measures for transparency were recommended. In addition, the commenters requested that the BLM pause consideration of any pending or new royalty rate reduction requests or approval of any coal lease or mining plan that would lead to underground mining activities requiring degasification systems, until completion of the PEIS.

Commenters had the following suggestions when conducting the NEPA analysis:

- Ensure sufficient cumulative impacts analysis, including a discussion of oil and gas development and state and private coal development. Review recommendations for approaching substitution impact.
- Limit the PEIS to a 3-year process to avoid delays, and ensure that the scoping report is released by the end of 2016.
- Consider recently finalized regulations and decisions and their impacts on coal mining (e.g., Clean Water Act Rule, Clean Power Plant (CPP), land use plan amendments for greater-sage grouse protection).
- Provide transparency throughout the NEPA process.
- Prepare comprehensive GIS and maps of coal resources and other key data, and make this information available for public review.
- Design a PEIS that could be tiered to and help facilitate a more streamlined leasing process and include specific guidelines on the NEPA process for obtaining a lease.
- Prepare a Reasonably Foreseeable Development Scenario.
- Quantify all coal impacts.
- Involve the Office of Surface Mining Reclamation and Enforcement (OSMRE) and other relevant state and Federal agencies in the NEPA process.

4.6.4 Issue 2 Air Quality

Commenters stated concern for the impacts that coal mining, burning, and transport can have on air quality, including an increase of pollutants and particulate matter in the air. This would result in poor air quality and unsafe conditions, such as soot, smog, and acid rain due to decreased air quality. Commenters also noted that the secondary impacts of poor air quality, including impacts on visibility, impacts on oceans and aquatic life, and impacts on public health. Some commenters also noted that the combustion of coal exports in other countries impacts North American air quality.

Some commenters suggested that the Clean Air Act (CAA) and other regulations have hurt the coal mining industry and require precisely blended coal to account for natural variations in different coal sources. One commenter stated that many mines do not meet the standards set by the Clean Air Act.

4.6.5 Issue 3 Climate Change

Commenters expressed concern about the contribution that coal mining and coal use have on climate change and stated that most coal must stay unmined if we are to avoid the worst effects of climate change. Commenters stated that burning coal extracted from public lands represents a significant contribution to greenhouse gas emissions and climate change.

Commenters also expressed concerns about specific direct, indirect, and cumulative impacts related to climate change, including the following:

- Water supply shortages
- More intense severe weather events
- More frequent and intense wildfire
- Impacts on human health
- Impacts on other uses of public lands
- Rising sea levels
- Shorter season for snow sports and reduced snowpack and ice formation
- Ocean acidification and impact on the fishing industry
- Heat waves
- Changing plant and wildlife habitat and ranges
- Invasive species outbreaks
- Extended ranges of disease carriers, like mosquitos and ticks

One commenter stated that climate damages from coal are 5 to 6 times greater than the value of coal, and that more coal has already been leased than is possible to burn without exceeding carbon budgets to meet climate objectives. One commenter suggested modeling climate impacts by alternative and their effect on royalty revenue, coal prices, energy markets, and energy substitution effects. Some commenters stated that climate change should not be considered during the PEIS process, due to the following reasons:

- Human-caused climate change has not been proven and cannot be accurately predicted.
- Climate change is already covered under NEPA and the existing leasing process.
- Coal's impact on climate change is offset by the protection that coal allows humans through affordable heating and cooling, sturdy buildings, and drought protection.

Commenters suggested that the PEIS should evaluate all fossil fuels and their relation to climate change taking into consideration both upstream and downstream greenhouse gas emissions, and that mitigation strategies for climate change should be employed. One commenter stressed the importance of an alternative that balances climate considerations with future energy demands. Commenters stated that the idea of a perfect substitution (replacement of Federal coal with coal from other sources) is not supported by recent findings and that the BLM should not use that assumption in climate change analysis.

4.6.6 Issue 4 Carbon/Greenhouse Gas Emissions

Issue 4.1 Social Cost of Carbon

Commenters stated that the social cost of carbon should be evaluated when reforming the Federal coal program, suggesting the following:

- The social costs of carbon should be built into coal royalties to reflect the true cost of climate change.
- Social costs should be used to quantify climate impacts of alternatives.
- Annual climate costs of the Federal coal program far outweigh benefits of fossil fuel production.
- A large increase in rates would result in a great benefit to climate and more revenue.
- The cost of coal would be much higher, if accounting for the social cost of carbon.
- Renewable energy is cheaper than coal, when considering the social cost of carbon.

Commenters also noted that there is a recent court decision supporting the use of the social cost of carbon. Commenters also provided specific direction for including the social cost of carbon, recommended models for social cost of carbon analysis, and alternative measures of quantifying carbon cost and other externalities.

Other commenters stated opposition to imposing a social cost of carbon for the following reasons:

- A carbon change large enough to dramatically curtail Federal coal production could be in violation of the dual mandate to balance environmental goals with Federal revenue generation.
- The social cost of carbon estimates are unrealistically high and technically unsound.
- The BLM does not have the authority to impose a social cost of carbon.
- Imposing the social cost of carbon would have limited effectiveness due to substitution to non-Federal coals or other fossil fuels and due to lack of pass through to end user.
- The social cost of carbon has not undergone notice-and-comment rulemaking.
- Imposing a carbon fee would be double regulation/taxing.

- Imposing a social cost of carbon on producers would increase electricity prices.
- Implementing the social cost of carbon may not be successful, due to lack of competition. If Federal coal auctions are not competitive, firms may lower bids to offset the social cost of carbon.

Issue 4.2 Carbon Capture

Commenters stated the following regarding carbon capture related to the PEIS:

- Greenhouse gas emissions associated with coal use can be negated with flue-steam capture.
- Money applied to renewable energy subsidies should be invested in developing carbon capture.
- Storage and carbon capture technology is necessary in order to meet climate goals.

Commenters also noted concerns over the lack of Federal aid in developing carbon capture technology. They cited specific states and coal industries that have examples of efficient power plants and sequestration technology.

Issue 4.3 Life-Cycle Emissions

Commenters stated that the PEIS should analyze greenhouse gas emissions and associated impacts from all stages of coal mining and usage. Specifically, consequential life-cycle analysis methods were recommended over attributional life-cycle analysis methods. Other commenters stated that the BLM's review of the Federal coal program is not the appropriate time to analyze life-cycle emissions, since the BLM cannot determine how the coal will be used, and life-cycle analysis studies are inadequate.

Issue 4.4 National Carbon Reduction Goals

Commenters expressed concern regarding how the Federal coal program will align with the Administration's greenhouse gas reduction goals reflected in the Paris Agreement and the CPP. Specifically commenters focused on whether continued levels of US coal production was consistent with the Paris Climate Agreement and the commitment to stay under 2 degrees Celsius of warming, and questioned whether coal exports undermine the commitment to end reliance on coal by 2020.

Commenters also cited studies, suggesting that new Federal coal leasing at any significant level is inconsistent with climate goals. Commenters suggested creating a "carbon budget" to help meet emissions reduction goals and implementing a carbon adder for upstream emissions to help meet climate commitments. Commenters also stated that not combusting coal is critical to meeting climate goals and that the BLM should finalize the coal mine methane rule-making, because of the potent impact methane has on climate change.

4.6.7 Issue 5 Coal Issue Topics

Issue 5.1 General Comment on Coal

General comments on coal fell under two main categories: commenters who requested a complete cessation of new leases, a reduction in coal mining, or increased regulation of coal mining on Federal lands and those who favored limited modifications to the coal program, continued coal mining, or expansion of coal mining on Federal lands.

Commenters requesting a reduction in mining provided the following rationales and opinions:

- The Federal coal program has not been modified in many years and is due for a reform.
- There is reduced demand for coal due to market and policy conditions and mining on Federal lands needs to be phased out.
- The environmental impacts of coal outweigh the beneficial uses.
- Coal mining contributes to climate change and greenhouse gas emissions.
- A sufficient amount of coal is already leased.

Some commenters also noted the importance of analyzing the impacts from all stages of the coal life. One person noted that current leases should be rescinded. Another person stated that it is better to continue mining on current operations than to start new operations, because new mines and disturbance will have a greater impact.

Commenters who favored maintaining or expanding Federal coal mining provided the following rationales and opinions:

- Coal is a low cost energy source and is necessary to provide reliable and affordable electricity.
- Investments should be made in clean coal technology over alternative energy sources.
- Companies will turn to mining on private lands if Federal lands cannot be mined.
- Studies prepared for Federal coal mining provides valuable information about other natural resources.
- The coal industry is already over regulated.
- Coal demand is cyclical, so recent studies of coal demand may not be representative.
- The US has “cleaner” coal than other countries.

- The low cost energy derived from coal improves the quality of life and allows other industries to be competitive.

Issue 5.2 Coal Land Use Planning Decisions

Commenters stated that, when making coal land use planning decisions, the BLM should consider other land uses on public lands and lands with environmentally sensitive or special habitat value. Commenters requested that the BLM review and revise unsuitability criteria, implement unsuitability screening criteria at the land use planning level, and document the screening process. Specific areas suggested as unsuitable for leasing were those where the hydrological balance cannot be restored to pre-mining conditions and areas where coal development should be avoided due to high conflicts with wildlife, fisheries, water, air, and protected lands.

Issue 5.3 Coal Leasing Pause

Some commenters expressed support for the coal leasing pause, stating that it should be extended or made permanent and reasoned that a sufficient amount of coal has already been leased. Other commenters stated opposition to the coal leasing pause. They stated that it should be removed because it negatively impacts the economy, violates other laws, and is an attempt by the administration to stop coal mining. They said that pending leases already include a lengthy NEPA evaluation and should not be subject to the moratorium.

In addition, some commenters stated that the BLM has underestimated the time lag that would be produced by a moratorium. They requested that there be a guarantee that the moratorium would not go beyond the stated 3 years. Others stated that the assumption that a 20-year supply of coal is already under lease, as noted in Order 3338, is based on faulty information.

Issue 5.4 Specific Coal Lease Applications

Commenters stated concern over both the environmental impacts of leasing and the economic impacts of delays for specific coal lease applications, including at the following: Alton Mine, Bull Mountain Mine, Greens Hollow Coal tract (SUFCO Mine), and the Williams Draw tract (Lila Canyon Mine). Commenters also stated that analysis for one recently leased mine, the Narley Mine No. 3 mine, was inadequate. In addition, commenters provided input on particular coal mining regions. They stated that coal from the North Fork Valley produces less pollution and should be selectively mined and that the Powder River Basin should be recertified as a coal producing region.

Issue 5.5 Coal Leasing Process

Many commenters stated concerns for the current leasing process. Some stated that the leasing process takes too long and should be streamlined to remove redundancy and unnecessary barriers to development. Other commenters suggested specific changes to the leasing process in order to limit environmental impacts and to ensure a fair and transparent leasing process. Commenters suggested the following changes:

- Discontinue the lease-by-application (LBA) approach, because it does not encourage competitive bids.
- Provide more public notification of pending lease applications, minimum bids, and other leasing decisions.
- Examine leasing at the coal reserve level and reinstate coal producing regions in which regional planning takes into account market conditions and environmental impacts.
- Expand coordination with adjacent Federal landowners before leasing.
- Increase competition among coal companies for Federal coal leases.
- Lease only to companies that demonstrate they are resilient to expected market fluctuation.
- Make companies pay upfront at the time of lease for reclamation and evaluate unmet reclamation obligations before making additional leases.
- Incorporate elements from the Solar PEIS and Oil and Gas Master Leasing Plans into the coal leasing process, such as analyzing appropriate areas to lease on a regional scale.
- Cap coal tonnage or British thermal units and accept bids only until this cap is met.
- Focus lease offerings near existing tracts to limit additional disturbance.
- Wait for adequate market demand and set minimum bid prices.
- Consider lease prices reflecting the opportunity value involved in purchasing an option to mine a public resource in the future, when coal prices may recover from current lows.
- Apply maximum economic recovery standards and prepare a reasonably foreseeable development scenario.

Other commenters said that the current leasing system is sufficient and stated the following:

- The BLM should not exclude operators with greater than 10 years of reserves due to the length of the leasing process and other permitting.
- The BLM should retain the industry-nominated systems, as industry representatives are informed about future market needs.
- Note that conducting lease sales at set times in the past (such as quarterly) did not attract sufficient bids.

- Consider delaying collection of bonus bids until mining begins on the leases and allow a royalty credit for the capital costs to establish a mining operation to increase competition for bids.
- Leave the determination of where to lease to the field office at the local planning level.
- The BLM should acknowledge that bidding by adjacent mine operators is economically logical, due to reduced capital costs and that it does not represent a noncompetitive process.
- The BLM should acknowledge that it has the ability to adjust the lease nomination to ensure adequate competition.
- The BLM should acknowledge that the LBA process and leases with one bid are fair, because the government sets a minimum price.

Issue 5.6 Coal Bonding

Commenters expressed concern over the amount of outstanding self-bonded reclamation liability and the self-bonding process in relation to Federal coal leasing, stating that it does not protect taxpayers and allows many companies to avoid reclamation.

Other commenters stated that changes to the self-bonding and reclamation regulations are in conflict with Surface Mining Control and Reclamation Act (SMCRA), and another suggested that the BLM does not have the authority to interfere with the States' ability to regulate surface coal mining and reclamation operations or to apply its discretionary authority over the bonding of such operations. In addition, one commenter stated that the leasing moratorium will impact the bonding of reclamation liability by reducing companies' revenue.

Commenters recommended the following specific changes to coal bonding:

- Eliminate self-bonding.
- Suspend approval of self-bonding for companies filing for bankruptcy.
- Charge a set amount for cost-recovery, based on the type of mine and application at the time of leasing.
- Require coal companies to put down a large deposit at the time of leasing.
- Impose full-cost bonding.
- Hold companies liable for failure to meet reclamation requirements.
- Require companies to purchase insurance to cover reclamation costs.

- Do not permit new leases for companies until all of their mines have been reclaimed.
- Work with the OSMRE to strengthen self-bonding regulations.

Issue 5.7 Fair Return/Coal Revenues

Commenters expressed concern over the current royalty rates and return to taxpayers. Many commenters stated that royalty rates should be raised, because coal companies are not paying a fair return to taxpayers and exploiting loopholes to undervalue coal. Commenters noted that current rates have been in place for 30 years, and it is time for a review. Some commenters stated that Federal coal sales represent nearly 41 percent of the total domestic production, which artificially lowers market prices, further reducing the amount of royalties received. Commenters also supported specific changes to royalty rates, including the following:

- Increase transparency and public input when determining market values.
- Use royalty rates for coal that match rates for offshore oil and gas.
- Assess royalties on the net delivery price of coal.
- Impose a cap on transportation deductions.
- Develop a comprehensive, coal-specific, costs test analysis tool that would quantify and monetize the full range of damages caused by coal and the true avoided cost value of renewables when used to replace coal.
- Factor in life-cycle and external costs.
- Consider using the social cost of carbon.
- Ban companies from selling coal to subsidiaries to depress rates (captive transactions).

Other commenters stated that there is no rationale to support raising royalty rates and that royalty rates should be decreased. Their concern over raising royalty rates were for the following reasons:

- Many companies currently pay a significant share of revenues in the form in royalties, taxes, and fees.
- The coal market is declining, and companies are already facing economic pressure.
- There is no empirical evidence to support the notion that increasing Federal coal royalty rates will increase Federal coal revenues.
- Coal companies already pay fair rates that benefit many local communities in a struggling economy.

- Coal exports are not a valid basis for reevaluating valuation regulations or royalty rates.
- Higher rates will render many Federal coal operations uneconomic.
- Higher rates will shift emphasis to use of private coal and thereby reduce royalties collected.
- Higher royalty rates will decrease production and return.
- Higher royalty rates will increase the costs of electricity due to companies transferring increased costs to consumers.

Commenters stressed the importance of considering all components of return when evaluating fair return numbers. One commenter stated that wind and solar subsidies should be considered with determining coal rates, and another suggested conducting a full cost-benefit analysis.

Other comments recommended that the BLM reinstate the Royalty Policy Committee and that the Department of the Interior eliminate the current FMV criteria and replace it with a new partnership model between government agencies and private industry.

Issue 5.8 Coal Exports

Commenters stated support for Federal coal exports for the following reasons: the BLM would benefit from exporting coal and allowing for a greater return, exports are a lucrative market, exports would help other countries meet their energy needs, and countries would find other coal sources if they were not supplied with US coal. One commenter suggested that the government should assist coal producers in accessing international markets.

Other commenters stated opposition for coal exports for the following reasons:

- Burning coal for domestic use, as opposed to exporting it for foreign use, is cleaner and more efficient.
- Coal exports will discourage other countries from investing in renewable energy sources.
- Exporting federally subsidized coal artificially drives down the price of coal in the global market.
- The United States should not mine public lands to supply other countries with coal.
- It is only the BLM's objective to sell Federal coal to aid in meeting the nation's energy needs.
- Burning coal overseas will still impact domestic air quality and undermine climate policy.

Commenters suggested that impacts related to coal transportation must be evaluated when considering exports, additional fees should be imposed for Federal coal that is shipped out of the United States, and the United States should look at how other federally owned minerals are valued and apply that standard to coal.

Commenters also stated that the PEIS must fully analyze and assess the reasonably foreseeable impacts of coal exports that may occur as a result of future coal management.

One commenter stated that exports need to be considered in market demands, while others stated that exports are so low that even aggressive expansion would have no effect on Federal coal production.

Issue 5.9 Coal Reclamation

Commenters stated concern over the coal mine reclamation process, citing the following issues:

- Many mines on Federal lands have still not been reclaimed.
- Reclamation standards are elusive.
- Mining companies get by with no reclamation, due to self-bonding.
- It takes many years for mine reclamation to reach original flora and fauna conditions.
- Reclaimed lands are often susceptible to invasive or nonnative species.

Commenters also suggested the following:

- There should be no new leasing until existing mines are reclaimed and comply with environmental standards.
- A company's history with reclamation should be considered when determining new leases.
- Coal companies should be held responsible for reclamation responsibilities.
- Reclamation planning should begin at the time of the lease.
- Coal companies should be required to put up adequate funds for reclamation.
- Mine reclamation should be as contemporaneous as possible.
- Mine workers should be trained in restoring public lands.
- Reclamation standards should be revised.

Other commenters stated that claims that mining companies do not reclaim lands are unfounded and that reclaimed lands are often more productive and can support multiple uses, such as livestock grazing and wildlife habitat. One commenter stated that the BLM does not have the authority to monitor reclamation.

Issue 5.10 Coal Mitigation

Commenters stated support for identifying and analyzing mitigation strategies in the Draft PEIS, specifically suggesting that a new mitigation protocol be developed, compensatory mitigation be implemented, mitigation measures be applied to existing leases, greenhouse gas offset acquisition be required by lessees, and a mitigation fund from coal lease payments be established.

One commenter suggested that the existing climate is a finite resource, so mitigation measures to combat climate change are necessary under the Presidential Memorandum Mitigating Impacts from Natural Resource Development. Another commenter stated support for protecting essential habitat areas and waterways before relying on mitigation measures. One commenter questioned whether any mitigation can offset environmental impacts from coal mining and development.

Issue 5.11 Coal Transportation

Commenters expressed concern for the impacts that transportation of coal can have on air quality, water resources, biological resources, visual resources, public health, noise, quality of life, and traffic in local communities. Commenters specifically stated concern for coal dust from trains and long traffic jams at train crossings.

Commenters request that the PEIS provide a detailed analysis and assessment of how Federal coal is transported from mines to the source of consumption and provide the public with information and analysis on what the impacts of this transport are likely to be.

Issue 5.12 Methane Capture

Commenters stated that the PEIS should incorporate reduction strategies for mitigating methane emissions. One commenter stated that there should be a pause on production from mines that require a degasification system to vent methane, and others suggested that the BLM should move forward with the Mine Methane Waste Rule. A few commenters also noted that methane hydrates are a potential energy source.

Issue 5.13 Surface Owner Rights

Commenters stated that the PEIS should incorporate protections for surface owners, including addressing the uncertainty of future mining beneath private land and consideration of surface landowners in split-estate transactions.

4.6.8 Issue 6 Environmental Justice

Some commenters stated that low-income populations will be disproportionately affected by the loss of jobs and the increase in electricity prices as result of Federal coal reform. Others stated that low-income populations, the elderly, children, and communities of color would be disproportionately subjected to adverse environmental, health, and economic impacts from coal mining, downstream activities, and climate change effects.

4.6.9 Issue 7 Public Health and Safety

Commenters stated that coal miners suffer health impacts, including respiratory diseases, increased incidence of cancer, and traumatic injury resulting from unsafe mine conditions. In addition, commenters cited concern for the impacts on public health and safety for those who live or work near coal extraction sites, including exposures to toxic pollutants in air and water, such as selenium, benzene, mercury, and arsenic.

Commenters noted that additional, more widespread impacts on human health, including increased risk of respiratory disease, heart disease, and neurological disorders, occur from coal-fired power plant emissions and from health effects related to warming temperatures and climate change. Some commenters also noted that increased health risks are present for children, pregnant women, and senior citizens. Commenters suggested that coal companies should be held accountable for external costs and poor health effects related to mining and stated that all steps of the coal life cycle are harmful to human health.

4.6.10 Issue 8 Socioeconomics

Many commenters noted the positive economic impacts that coal mining has had on their communities, including employment, income, and tax and royalty revenue. Commenters also discussed the public projects and services funded by coal revenues.

Conversely, one commenter stated that coal communities are some of the poorest in the nation, and another suggested that Federal coal subsidies unfairly disadvantage coal producers and result in decreased economic contributions. Another commenter stated that federally leased coal mining is less labor intensive than private coal mining and creates fewer jobs.

Commenters stated that Federal coal reforms, such as increased royalty rates, could result in potential bankruptcies for coal companies and socioeconomic impacts, including the following:

- Direct loss of jobs and income in the coal mining industry
- Loss of secondary jobs supported by the industry and employee spending in coal mining communities

- Increased electricity prices, due to higher costs of less reliable alternative energy sources and the subsequent impact of less disposable income to spend elsewhere
- Loss of social benefits that come with providing affordable and reliable power to other industries at all hours (e.g., healthcare and the military)
- Jobs shifting to other countries when domestic coal is no longer competitive

Some commenters also noted that declining coal production would result in disproportionate economic impacts on rural communities.

Other commenters stated that climate change and environmental degradation resulting from coal mining affects certain industries, such as tourism and recreation. Others suggested that coal mining increases health care costs and associated decreases in workforce productivity and that traffic, noise, and pollution impact the quality of life for coal mining communities. Some commenters suggested that transitioning to renewable energy sources now would result in cheaper electricity rates and decreased costs from environmental and health impacts in the long term and would allow for economic diversification in coal mining communities.

Many commenters also recommended that assistance be available to help coal miners transition to other jobs and ensure a just transition of coal-dependent communities to a renewable energy future. One commenter warned that impacts on small businesses must be adequately analyzed to comply with the Regulatory Flexibility Act and the Small Business Regulatory Enforcement Fairness Act.

4.6.11 Issue 9 Tribal Interests and Native American Concerns

Commenters expressed concern for the impacts that coal mining has on tribal interests and suggested the following be considered during the PEIS process:

- Coal mining impacts on climate change and non-industrialized nations
- Requirements for consulting with tribes
- Environmental impacts on tribal lands
- Limits on coal transportation over tribal land
- Restrictions on mining, in view of religious or cultural sites
- Impacts on fishing rights and tribal traditions

Other commenters expressed concern for the impacts that changes in coal regulation would have on tribal funding from coal mining and stated that it

would further impede coal mining. One commenter stated that this would be an infringement on tribal sovereignty.

4.6.12 Issue 10 State's Interests and Concerns

Commenters had suggestions related to state involvement during Federal coal reform, including transferring public lands to the states, involving state officials in policy discussions, considering impacts on state resources and local governments, and revisiting Federal/state lease profit split agreements and setting "appropriate use" parameters. One commenter stated that is important to consider the unique situations in individual states as part of the PEIS process (e.g., amount of coal mined, number of jobs, revenue, etc.).

4.6.13 Issue 11 Visual Resources

Commenters expressed concern for the impact that coal mining has on visual resources and stated distaste for the scarred landscape.

4.6.14 Issue 12 Water Resources

Commenters stated concern for water resource impacts, including the following:

- Contamination of surface and underground water sources and related concerns about contaminated domestic water supplies and impacts on wildlife
- Depletion of groundwater sources and impacts on other land uses
- Failure to properly reclaim the mined area, leading to failed water restoration and the associated water resource risks resulting from climate change, such as drought, flooding, and acidification

One commenter suggested that coal mining does not have an impact on water quality, due to National Pollution Discharge Elimination System permitting procedures in place.

4.6.15 Issue 13 Biological Resources

Commenters stated concern for biological resource impacts, including the following:

- Habitat fragmentation
- Impacts from river sedimentation
- Disturbance of vegetation and wildlife habitats and susceptibility of mined areas to invasive species
- Dangerous metals and compounds impacts on wildlife
- Construction and transportation impacts on wildlife

Many commenters also noted concerns with impacts on aquatic and avian wildlife caused by climate change, including habitat loss and ocean acidification. Conversely, some commenters stated that wildlife coexists with mining operations and often thrives on reclaimed mine lands.

One commenter stated that the BLM is required to initiate consultation with the Fish and Wildlife Service and the National Marine Fisheries Service at the PEIS level.

4.6.16 Issue 14 Other Resource Impacts

Commenters stated that the analysis should be at multiple scales and should consider impacts on additional resources and resource uses, such as night skies, geological risks like subsidence, other land uses, such as agriculture, and wilderness characteristics. Some commenters stated that reclaimed coal mines have a beneficial impact on grazing, and others noted impacts on adjacent lands, including National Parks, such as Bryce Canyon.

4.6.17 Issue 15 Renewable Energy

Commenters stated support for investing in renewable energy programs over coal mining operations, due to the decreased environmental impact and efforts to mitigate climate change. They suggested implementing programs to help coal miners transition to renewable energy jobs. Commenters also stated that there is enough coal currently under lease to last through a transition to renewable energy.

Other commenters expressed opposition to renewable energy, stating that solar and wind farms have visual impacts, kill wildlife, and still require mining, because they need rare earth minerals. Commenters also stated that solar and wind energy cannot be supported in the eastern the United States, due to lack of available space; also, it is not an economically feasible, reliable, or consistent energy source. In particular, commenters stated that government subsidies are required to make renewable energy competitive with fossil fuels and that these forms of energy result in reduced tax and royalty contributions. One commenter suggested embracing microgrids instead of large grid interconnections.

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CHAPTER 5

FEDERAL COAL LEASING PROGRAM

The following chapter describes the Federal coal program and provides baseline information intended to provide context for the consideration of program reform opportunities. This chapter includes: authorities, other Federal agency roles and responsibilities, historical information, state of the coal industry information, coal leasing and production data, market projections for coal, greenhouse gas emissions, socioeconomic considerations, and an overview of the Federal coal leasing process. It is important to note that Secretarial Order 3338 specifically stated that the Order does not apply to the coal program on Indian lands, as that program is distinct from the BLM's program and is subject to the unique trust relationship between the United States and federally recognized Indian tribes and government-to-government consultation requirements, nor does it apply to any action of the Office of Surface Mining Reclamation and Enforcement or the Office of Natural Resources Revenue.

5.1 AUTHORITIES

The Mineral Leasing Act of 1920, as amended (30 USC 181 et seq.), authorizes and governs leasing of public lands for developing deposits of coal, oil, natural gas, and other minerals. The Mineral Leasing Act gives the BLM responsibility for managing coal leasing on approximately 570 million acres of mineral estate that is owned by the Federal government, where coal development is permissible. Depending on the location, the surface estate of these lands is managed by the BLM, United States Forest Service, private landowners, state landowners, or other Federal agencies. Regulations that govern the BLM's coal leasing program may be found in Parts 3000 and 3400 of Title 43 of the CFR. As described below, other Federal and state agencies are responsible for regulating the environmental effects of coal mining, issuing permits to operators, collecting fees from the development of Federal coal, mine reclamation, and ensuring the health and safety of mine operations.

The Federal Coal Leasing Amendments Act (FCLAA) of 1976, as amended, (P.L. 94-377; 90 Stat. 1083–1092) updated sections of the Mineral Leasing Act, focusing on issues related to FMV and speculation. The FCLAA repealed the noncompetitive preference right leasing system for coal and required all new leases to be sold in a competitive bidding process. The FCLAA banned the BLM from accepting any bid less than the estimated FMV of the lease. It tightened diligent development and continuous operation requirements, and made enforcement of these provisions nondiscretionary. The FCLAA also established the principle of Maximum Economic Recovery, and facilitated the consolidation of leases into logical mining units for maximum economic recovery. To help with recovery of less accessible coal, the law authorized the BLM to make carefully justified and controlled modifications to a company's royalty rate or lease terms.

The FLPMA (43 USC 1701 et seq.) establishes the broad framework under which BLM manages public lands today. FLPMA established a unified, comprehensive, and systematic approach to managing and preserving public lands in a way that protects "the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values." It established the principles of land use planning to guide the BLM in making its land management decisions. This framework required Federal land managers to balance conflicting demands on the land: productivity, environmental values, recreational opportunities, and economic return. FLPMA also required that the BLM ensure receipt of FMV in return for private extraction of public resources, and tasked the agency with considering likely future land uses, environmental concerns, and the protection of lands with wilderness characteristics when making long-term management decisions.

The SMCRA of 1977 (30 USC 1201 et seq.) is the primary Federal law that regulates the environmental effects of coal mining in the United States. SMCRA essentially created two programs: one for reclaiming pre-SMCRA abandoned mine lands and the other for regulating active coal mines. Title IV of SMCRA established the Abandoned Mine Reclamation Fund, supported by a fee on every ton of coal produced, to reclaim mine lands abandoned before the passage of SMCRA. Title V of SMCRA sets minimum performance standards for environmental protection and public health and safety that apply to surface coal mining and reclamation operations, surface effects of underground coal mining operations, and surface coal mining in special areas or in special circumstances (such as steep slope mining). A person who proposes to conduct surface coal mining and reclamation operations (which include surface effects of underground mining by definition) must apply for and receive a permit, which incorporate provisions of SMCRA and regulations (or the state equivalent), and must post performance bonds to cover the costs of reclamation.

In general, SMCRA establishes a program of cooperative federalism that allows a state or tribal regulatory authority (RA) to assume primary jurisdiction

(primacy) over the regulation of surface coal mining and reclamation operations within its borders once its regulatory program has been approved by the Secretary of the Interior. SMCRA requires that a state or tribal program demonstrate that the state's or tribe's rules and regulations are consistent with regulations issued by the Secretary pursuant to SMCRA. The OSMRE is responsible for ensuring that SMCRA is being enforced directly in Federal program states and tribes and through oversight of primacy states and tribes in order to ensure that each state and tribal RA is enforcing its counterparts to the Federal regulations.

The Energy Policy Act of 2005 (PL 109–58, 119 Stat. 594-1143) included five sections related to the Federal coal program, which involved increasing the cumulative acreage allowed for coal lease modifications, establishing a new mechanism to extend a logical mining unit beyond 40 years, providing new bonding provisions for payment of the remaining balance of a deferred bonus bid, changing the requirements for advance royalty payments, and changing the timing for development plan submission. Draft BLM regulations have been developed to implement those sections but have not yet been finalized (78 FR 49080-103, August 12, 2013). The BLM issued the following interim guidance documents to implement the Energy Policy Act of 2005:

- Advance royalty guidance (Energy Policy Act of 2005 Section 434) is provided in BLM-WO-IM-2006-127.¹⁴
- Deferred bonus bids guidance (Energy Policy Act of 2005 Section 436) is provided in BLM-WO-IM-2006-045.¹⁵
- Guidance regarding increased acreage for lease modification (Energy Policy Act of 2005 Section 432), which increased the limitation for lease modifications from 160 acres to 960 acres, is provided in BLM-WO-IM-2006-004.¹⁶

5.2 OTHER FEDERAL AGENCY ROLES AND RESPONSIBILITIES

The OSMRE within the Department of the Interior is responsible for carrying out the requirements of SMCRA in cooperation with states and tribes. OSMRE ensures that coal mines are operated in a manner that protects citizens and the

¹⁴BLM. 2006. Instruction Memorandum No. 2006-127 Interim Guidance for Implementation of the Energy Policy Act of 2005 for Federal Coal Lease Advance Royalty. March 24, 2006. Washington, DC. Available at https://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2006/im_2006-127__.print.html

¹⁵BLM. 2005. Instruction Memorandum No. 2006-045. Interim Guidance for Implementation of The Energy Policy Act of 2005 [P.L. 109-58] for Federal Coal Lease, Deferred Bonus Bonds. November 25 2005. Washington, DC. Available at https://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2006/im_2006-045__.print.html

¹⁶BLM. 2005. Instruction Memorandum No. 2006-004. Interim Guidance for Implementation of the Energy Policy Act of 2005 [P.L. 109-58] for Federal Coal Leasing. Washington, DC. September 30, 2016. https://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2006/im_2006-004__.html

environment during mining and assures that the land is restored following mining. The OSMRE and the approved State RAs oversee the issuance of mine permits and reclamation bonding. SMCRA provides, however, that approval of mining plans under the Mineral Leasing Act cannot be delegated to the State RAs (30 USC 1273(c)). As a result, OSMRE is responsible for making a recommendation to the Secretary as to whether to approve, disapprove, or approve with conditions a mining plan or mining plan modification (30 CFR part 746). As part of this process, OSMRE notifies the BLM of any mine permit application on Federal lands and provides an opportunity for the BLM's input before it makes a recommendation to the Assistant Secretary of the Interior, Land and Minerals Management. SMCRA also requires OSMRE to work to mitigate the effects of past mining by pursuing reclamation of pre-SMCRA abandoned coal mines. However, despite remarkable achievements in reclamation of many abandoned coal mine sites that existed prior to the enactment of SMCRA, there remain more than \$4 billion worth of high priority health and safety coal-related abandoned sites in OSMRE's Abandoned Mine Land Inventory System (e-AMLIS) to be reclaimed.

The Office of Natural Resource Revenue (ONRR) within the Department of the Interior manages and ensures full payment of revenues owed for the development of the nation's energy and natural resources on the Outer Continental Shelf and onshore Federal and Indian lands. The ONRR collects, accounts for, and verifies natural resource and energy revenues due to states, American Indians, and the US Treasury, which includes product valuation. The ONRR coordinates with other Department of the Interior entities, including the BLM, Bureau of Indian Affairs, and Bureau of Ocean Energy Management (BOEM) to support the Department's management of oil, gas, coal, and other natural resources. The BLM works closely with the ONRR to ensure that the coal lessees are reporting coal production, sales, and inventory, which serve as the basis for revenue collection. The ONRR will notify the BLM if revenues are not being paid, and the BLM will enforce the terms and conditions of the lease, which may result in lease cancellation procedures.

The Mine Safety and Health Administration (MSHA) within the Department of Labor is delegated the responsibility of enforcing the Federal Mine Safety and Health Act of 1977, as amended, (30 USC 801 et seq.) and the Mine Improvement and New Emergency Response Act of 2006 (P.L. 109-236; 120 Stat. 493-505). MSHA works to prevent death, illness, and injury from mining and to promote safe and healthful workplaces for US miners. The agency develops and enforces safety and health rules for all US mines, and it provides technical, educational, and other types of assistance to mine operators. MSHA works cooperatively with industry, labor, and other Federal and state agencies to improve safety and health conditions for all miners in the United States. The BLM coordinates closely with MSHA in approval of the Resource Recovery and Protection Plans (R2P2) for each lease to assure the R2P2 are consistent with MSHA safety requirements and approved safety plans.

Other surface management agencies participate in the Federal coal leasing process. As previously stated, the Mineral Leasing Act gives the BLM responsibility for managing coal leasing on the mineral estate that is owned by the Federal Government. Depending on the location, the surface estate of these lands could be managed by the BLM, United States Forest Service, private landowners, state landowners, or other Federal agencies. The BLM is required to receive consent or concurrence from the appropriate surface management agency before issuing a lease or approving an exploration plan (43 CFR, Subparts 3425.3[b], 3482.2[a][1]). This occurs most frequently with coal reserves underlying National Forest System lands. In these cases, the BLM is required to apply any stipulations provided by the Forest Service to a lease or reject the lease application if the Forest Service does not give its consent.

5.3 HISTORICAL PERSPECTIVE

Prior to passage of the Mineral Leasing Act of 1920, the Coal Lands Acts of 1864 and 1873 provided for the public auction of lands containing coal for private ownership and extraction. The passage of the Mineral Leasing Act took place in the context of a larger national debate about public land management. Until that point, Federal land policy had consistently been aimed at encouraging economic development of natural resources. Homesteading, railroad grants, state land grants, forestry programs, and the patenting process all sought to stimulate settlement, especially in more sparsely populated western lands. By the early 20th century, however, an opposing philosophy of managed development asserted that the public deserved compensation for private profit made on Federal land. The Mineral Leasing Act was the first in a series of laws that sought to balance development with revenue collection and management of leasing scale and location by the Federal government.

In 1920, the Mineral Leasing Act consolidated management of Federal coal resources with oil, natural gas, and certain other minerals and established a system of managed leasing of minerals on Federal lands. This allowed the government and tribes to retain control of public and tribal minerals and property while still encouraging development of the mineral resources they contained. This new program established the expectation that the public should be compensated for minerals mined on public land, and granted the Federal government control over the location and scale of that mining. It introduced the concepts of setting leasing levels, competitive bidding, and production royalties. The Mineral Leasing Act, along with amendments to the Act, forms the basis of the current Federal coal program.

From the passage of the Mineral Leasing Act to the early 1960s, low demand led to very little Federal coal leasing. The coal that was produced was typically in small quantities for railroad or local use, reflecting the absence of any large-scale demand for western coal. The 1960s saw an uptick in Federal coal leasing as interest in western coal began to increase. While from 1920 to 1960 Federal coal leasing averaged slightly more than 4 leases per year, the 1960s averaged 31

leases issued per year. However, many of these leases were speculative. By 1973, over 70 percent of the Federal coal leases ever issued had not produced any coal.

Public opposition to new hydroelectric dams and nuclear power that occurred in the 1960s combined with the formation of the Organization of the Petroleum Exporting Countries (OPEC) spurred increases in oil and gas prices, which positioned coal as the principal power plant fuel in the United States. Additionally, the passage of the CAA of 1970 created new incentives for cleaner burning, low-sulfur western coal. Utilizing this low-sulfur coal allowed coal-fired power plants to attain the standards set forth in the CAA of 1970 without the need to install costly flue-gas desulfurization units. The shift to western coal also spurred the construction and operation of a number of mine mouth power plants (i.e., power plants built on site at the coal mine) in part due to the cost benefits of shipping electricity through power lines compared with shipping coal by rail.

The interest in the vast reserves of western Federal coal brought new scrutiny to the management of the resource. As noted above, many leases in the west were being held in speculation and had not produced any coal. Concerns regarding speculation and nonproductive leases, as well as a lack of a clear regulatory framework, motivated the Department of the Interior to place a moratorium on Federal coal leasing in May 1971. Congress passed both FCLAA in 1976 and SMCRA in 1977. These two acts fundamentally changed the authorizing framework for the Federal coal program, thus requiring a programmatic review of the Federal coal leasing program to establish a new implementing regulatory structure. In 1979, the BLM published the Final Programmatic Environmental Statement Federal Coal Management Program.¹⁷ The final rulemaking was published on July 19, 1979 (44 Fed. Reg. 42584). The results of this effort provided the framework for a largely revised coal leasing program, including guidance for the administration of existing leases, the processing of Preference Right Lease Applications, and the review of Federal lands to determine unsuitability for certain types of mining. The new final regulations established standards and procedures for determining when, where, and how to lease Federal coal (principally through competitive sales under a regional leasing program) and implemented FCLAA, as well as those aspects of SMCRA that were under the BLM's authority. As a result of these reforms, the moratorium was lifted in January of 1981.

The Powder River Basin of Wyoming held its first regional coal lease sale under the new program in 1982. However, irregularities with the sale led to questions as to whether the BLM had realized a FMV for the leases. These concerns prompted Congress to create the Commission on Fair Market Value Policy for

¹⁷ The 1979 programmatic review document was titled "Programmatic Environmental Statement." The subsequent supplement used the more modern terminology "Programmatic Environmental Impact Statement."

Federal Coal Leasing (known as the Linowes Commission) chaired by economist David F. Linowes, who had recently chaired Congress's Commission on the Fiscal Accountability of the Nation's Resources. Congress instituted another leasing moratorium during the Linowes Commission's review, which concluded 90 days after the publication of the Commission's report in February 1984.¹⁸ The report provided 36 recommended changes to the Federal coal leasing program, some of which were gradually implemented over the next several years, while others were not. A key recommendation of the Linowes Commission was that "[t]he government should establish and announce in a timely fashion a coal leasing schedule to promote predictability and stability of federal leasing actions. In doing so, the government should have the flexibility to change the timing of lease sales and the quantity of coal offered based on its assessment of market conditions." The BLM published a Supplement to the Final Programmatic EIS of 1979 in October 1985 in response to these recommendations.

As a result of the Commission's report, the Department of the Interior revised the coal regulations to incorporate a two-tiered leasing structure. In certified coal producing regions where exploration and new mining was occurring, the BLM, through the Regional Coal Teams, would select tracts for lease sale. In areas outside of coal producing regions, mining companies would apply for specific tracts of lands to be leased (i.e., LBA), generally adjacent to their existing mines, also known as maintenance leasing. Notwithstanding this initial effort to inject competition into the lease sale process by planning in advance what resources were offered for sale in a region, the changes were short lived. Between 1987 and 1990, all six coal producing regions were "decertified" by the BLM, which cited considerations such as weak current and projected coal market conditions, the level of leasing interest in Federal coal and new mine development, public input, and views expressed by the Regional Coal Teams and the affected governors.¹⁹ This had the effect of replacing the competitive regional leasing process with the LBA process.²⁰ Today, there are no regional

¹⁸ The coal leasing moratorium was not lifted upon publication of the Commission's report. Interior Secretary William P. Clark extended the suspension of coal leasing (with exceptions for emergency leasing and processing preference right lease applications, among other things) while the Interior completed its comprehensive review of the program. This review included proposed modifications to be made by the Department in response to the Linowes Commission, as well as other reports. Secretary Clark announced on August 30, 1984, that the Department of the Interior would prepare an EIS supplement to the 1979 Final Environmental Statement for the Federal Coal Management Program. The Department issued the Record of Decision for the PEIS supplement in January 1986, in the form of a Secretarial Issue Document. This document recommended continuation of the leasing program with modifications. In conjunction with those modifications, Secretary Donald Hodel lifted the leasing moratorium in 1987.

¹⁹ BLM Handbook, H-3420-1, *Competitive Coal Leasing*, allows a lead state director to request decertification of a designated coal production region if this is the course recommended by the Regional Coal Team. A proposal to decertify a designated coal production region must be announced in the *Federal Register* (H-3420-1, Rel. 3-325).

²⁰ BLM. 1999. Public Participation in Coal Leasing. Final Rule. *Federal Register* Vol 52. Pp. 239-240. September 28, 1999. Available at <https://www.blm.gov/nhp/news/regulatory/3400-3420/3400-20f.pdf>

lease sales, and all new leasing is done through either the LBA process or lease modifications.

The Federal coal program remained relatively unchanged throughout the 1990s and 2000s. During that time, the Powder River Basin became the primary area of Federal coal leasing and production, and Federal coal commanded a much larger share of national coal production. The Federal coal program was last reviewed in 2013 by the Department of the Interior OIG and the GAO in two separate audits.^{21,22} The OIG and GAO focused their specific recommendations on improving existing agency procedures (such as how to conduct FMV appraisals), however, both reviews made clear that Federal coal lease sales continue to suffer from a fundamental lack of competition under the LBA process. While BLM LBA sales are conducted through a competitive bidding process, the GAO noted that in fact, of the 107 tracts leased from 1990 to 2012, “sales for 96 (about 90 percent) involved a single bidder...which was generally the company that submitted the lease application. More than 90 percent of the lease applications BLM received were for maintenance tracts used to extend the life of an existing mine or to expand that mine’s annual production.” Combined, the audits resulted in 21 recommended changes to the BLM’s coal program covering coal leasing and exports, inspection and enforcement activities, transparency of the process, and timely processing of royalty rate reduction applications. The BLM addressed all 21 recommendations in new BLM guidance (including two new manuals and handbooks²³) and development of additional mine inspector and valuation training.

Many stakeholders expressed concerns that BLM’s corrective actions, while helpful, were insufficient to rectify fundamental weaknesses in the program. To further explore these concerns, Secretary Jewell and the BLM hosted a series of listening sessions in March 2015 across the country to hear from the public their views on what, if any, reforms were seen as needed to the Federal coal program.

In response to the broad range of issues raised over the course of the past few years and through the listening sessions, on January 15, 2016, Secretary Jewell issued Order 3338 (see **Section 2.2**). The Order directs the BLM to carry out the following:

- I. A formal, comprehensive review of the Federal coal program through a discretionary programmatic EIS under NEPA

²¹ OIG. 2013. Final Evaluation Report-Coal Management Program. CR-EV-BLM-0001-2012. June 11, 2013. Available at <https://www.doi.gov/sites/doi.gov/files/CR-EV-BLM-0001-2012Public.pdf>;

²² GAO. 2013. Coal Leasing: BLM Could Enhance Appraisal Process, More Explicitly Consider Coal Exports, and Provide More Public Information. GAO-14-140. Published December 18, 2013. Publicly Released February 4, 2014. Available at <http://www.gao.gov/products/GAO-14-140>.

²³ US EIA. 2016. Changing US Energy Mix Reflects Growing Use of Natural Gas, Petroleum, and Renewables. July 21, 2016. Available at <http://www.eia.gov/todayinenergy/detail.php?id=27172>

2. A pause on significant new coal leasing decisions on public lands while the programmatic review is underway, with limited, enumerated exemptions and exclusions
3. A series of good government reforms to improve transparency and program administration, including establishing a public database to account for the carbon emissions from fossil fuels on public lands

5.4 STATE OF THE COAL INDUSTRY

According to the US Energy Information Administration (EIA), US coal consumption declined by more than 12 percent in 2015, relative to 2014, and is now at its lowest level since 1982.²⁴ New mine starts are very rare, and mining generally occurs in mature basins where there are active mines with known additional reserves. When existing mines need to secure additional coal reserves, it is generally to maintain current production levels necessary to fulfill existing contracts. The greatest percentage of Federal coal can be classified as “thermal” coal and is used for electrical generation. Approximately 33 percent of the nation’s electricity was produced from coal in 2015. Coal produced from Federal leases is generally sold into the domestic market, and at this time, only a small share of coal produced in Federal coal producing states is exported. For instance, coal exports from the Powder River Basin (where most Federal coal is located) were approximately 10 million tons (2.5 percent) out of the 404 million tons produced in 2015.²⁵ The reasons for a softening market are varied, but include a reduction in coal-fired generating capacity is primarily due to the decrease in natural gas prices, the aging coal fleet, and expanded requirements that coal plants install pollution controls. There has been an increase in coal companies filing for bankruptcy, which began in 2012 and recently included three of the nation’s largest producing companies.

5.4.1 Energy in the United States

Coal has been a significant contributor to total US energy consumption since the industrial revolution when steam-powered ships and railroads dominated transportation. In the latter half of the 1800s, coal was first used to generate electricity.²⁶ However, its role has decreased substantially over the past century (see **Figure 5-1**). At the beginning of the 20th century, coal provided for 75 percent of all US energy consumption with biomass and hydroelectric generation also providing significant sources of energy. By the mid-20th century coal had dropped to 36 percent of total US energy consumption in large part due to the role of increased demand for petroleum and mass production of the automobile. As natural gas consumption quadrupled over the next half century

²⁴ US EIA. 2016. Changing US Energy Mix Reflects Growing Use of Natural Gas, Petroleum, and Renewables. July 21, 2016. Available at <http://www.eia.gov/todayinenergy/detail.php?id=27172>

²⁵ Woods Mackenzie. 2016. Powder River Basin Coal Supply Summary. June 2016.

²⁶ US Department of Energy. 2013. A Brief History of Coal Use. February 12, 2013. Available at http://www.fe.doe.gov/education/energylessons/coal/coal_history.html

and nuclear energy was developed, coal's share of total energy consumption decreased to 23 percent of total energy consumption by 2000.²⁷

Since the turn of the century, energy consumption from natural gas has increased by nearly another 20 percent in large part due to advances in hydraulic fracturing. Renewable energy, such as wind and solar, have also become more cost competitive and widely available over the past 5 years. Energy demand growth has also slowed relative to historical averages due to some shifting from a manufacturing-based economy to a services-based economy and demand side energy efficiency breakthroughs. By 2015, coal constituted just 16 percent of total energy consumption in the United States. Early 2016 data suggest that its share will be even smaller as coal production and consumption reached multi-decade lows throughout the first three quarters of the year.²⁸

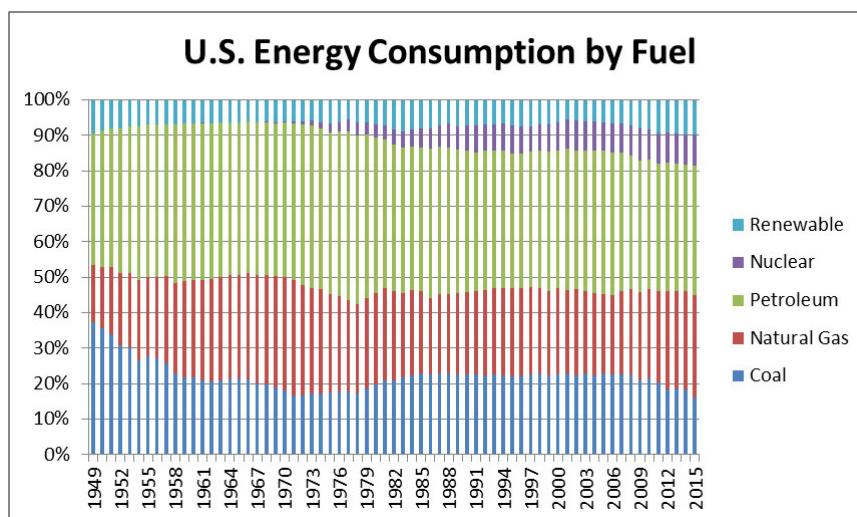


Figure 5-1. US Energy Consumption by Fuel Type

Source: EIA 2016²⁹

5.4.2 Major Coal Basins and Characteristics

Major coal fields of the United States are shown in **Figure 5-2**. For the purposes of this overview in the scoping report, coal mining in the United States is divided into three primary regions: Appalachian, Interior, and Western.³⁰ In 2015, 42 percent of all coal produced in the United States came from Federal lands. The vast majority of coal mined on Federal lands (more than 99 percent)

²⁷ US EIA. 2016. October 2016 Monthly Energy Review. Table I.3. Primary Energy Consumption by Source. Release date October 27, 2016. Available at <http://www.eia.gov/totalenergy/data/monthly/#summary>

²⁸ Ibid.

²⁹ US EIA. 2016. October 2016 Monthly Energy Review. Table I.3. Primary Energy Consumption by Source. Release date October 27, 2016. Available at <http://www.eia.gov/totalenergy/data/monthly/#summary>

³⁰ The regional breakdown in the PEIS may differ from the overview in the scoping report.

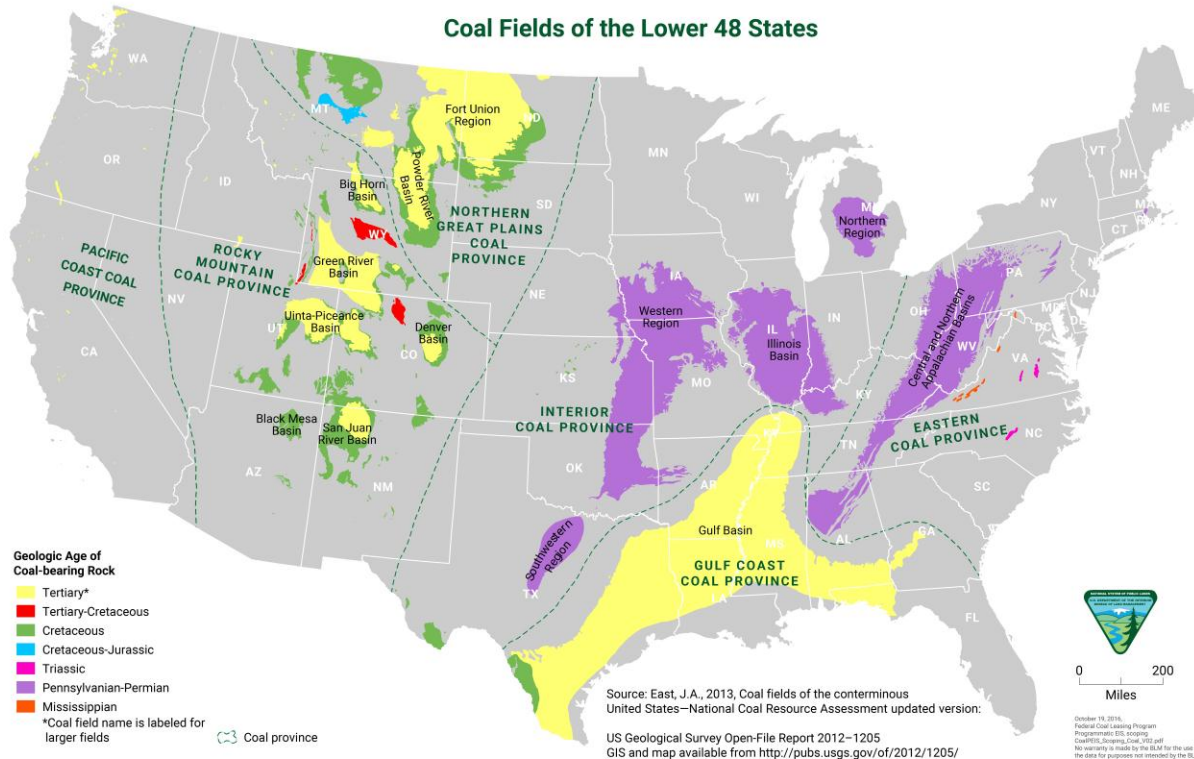


Figure 5-2. Coal Fields of the Lower 48 States

is located in the western region. Of the 306 active Federal leases in 2015, all but six of those leases were located in the western region.³¹ More narrowly, nearly 90 percent of the coal mined on Federal lands occurs in the Powder River Basin located in Wyoming and Montana. Any changes to the Federal coal program will have a more direct impact in the western region and Powder River Basin due to this heavy concentration of leases and production from the Federal estate.

As described below, coal has different characteristics in energy content and environmental properties that vary both within and between basins. The variation in the characteristics of coal typical to each basin can be significant, and, therefore, coals are not perfect substitutes for each other. For example, some western coals have less energy content than some eastern counterparts. Therefore, it takes more tons of these western subbituminous coals as compared with eastern bituminous coals to generate a given amount of electricity. Moreover, some power plants are designed to best accommodate certain ranks of coal. Coal switching is possible at most plants, but they may

³¹ BLM. 2016. Total Federal Coal Leases in Effect, Total Acres Under Lease, and Lease Sales by Fiscal Year Since 1990. July 7, 2016. Available at http://www.blm.gov/wo/st/en/prog/energy/coal_and_non-energy/coal_lease_table.html

need modifications (such as increased material handling capacity) to accommodate a different coal rank.

Production from the western coal region is largely comprised of the Powder River Basin subbituminous coal and other western bituminous coals. Among coal nationwide, the Powder River Basin is the single largest producing basin. In 2015, approximately 44 percent of United States coal production came from the Powder River Basin.³² It is generally the lowest cost coal to produce due to thick coal seams reaching up to 400 feet and the proximity of the coal seams to the earth's surface, which allows surface mining generally. The subbituminous coal has lower heat content generally ranging from 8,200 to 8,900 Btu (British thermal units)/lb and lower sulfur content.³³ Due to both its low-heating value per ton and its distance from the eastern United States, where many coal-fired power plants are located, transportation costs become more significant for this basin.

Other Federal coal production occurs in the western bituminous region comprised of mines in Colorado, Utah, Arizona, southwestern Wyoming, and New Mexico. These western bituminous coals generally have higher mining costs due to thinner seams generally in the 5-15 feet range, though they tend to have higher heat content on average than the Powder River Basin coal. Outside of the Powder River Basin states of Wyoming and Montana, Colorado and Utah are the next highest producing coal states on Federal lands. They are generally considered to be high-quality coals, having high energy value and low sulfur content (averaging around 11,000 Btu/lb), and many have a 1.2 pound or less of sulfur dioxide content (SO₂/mmBtu). Like the Powder River Basin, the western bituminous region is mainly utilized as thermal coal as well. However, there is one mine that produces a significant amount of metallurgical coal. Metallurgical coal is generally higher in carbon content and calorific value and is used in the production of steel rather than electricity generation purposes.

The Appalachian region is generally characterized as having three basins: the southern Appalachian, central Appalachian, and northern Appalachian coal basins. Coal produced in these basins generally have higher mining costs than the rest of the country as the coal seams are, on average, thinner and deeper relative to other regions. This results in high strip ratios for surface mines (the amount of material/earth that must be removed in order to remove a unit of coal), which drives up capital and operating cost, or underground mining operations which also drive up costs. The region is predominantly bituminous coal with high energy and low sulfur content. Higher energy content allows power plants to consume less coal to extract a given amount of energy. It also

³² US EIA. 2016. Coal Production and Number of Mines by State and Mine Type, 2015 and 2014. Annual Coal Report. November 3, 2016. Available at <https://www.eia.gov/coal/data.php#production>

³³ A small amount of bituminous coal occurs within the Powder River Basin in the Bull Mountain coalfield. See Woods Mackenzie. 2016. Powder River Basin Coal Supply Summary. June 2016.

has the advantage of being located in the east, where the majority of electricity demand and coal generation occurs, making transportation from mine to power plant relatively less expensive. Nevertheless, the Appalachian region is generally characterized as the highest cost coal of the major regions with the southern basin being the highest, followed by central and northern Appalachian basin coals.

The Interior region is largely comprised of the Illinois Basin, Gulf Lignite, and Western Region (Interior) coals. The Illinois Basin is the largest producing basin in this region and is comprised of bituminous coal with slightly less heat content than Appalachian coals on average. The coal seams are most often in the 1- to 10-foot thickness range and are generally located at depths less than 1,000 feet. Coal mining costs are lower in this region relative to the Appalachian due to more favorable seam thickness, mining conditions, and advances in long-wall mining technology. The coal mines also have the advantage of being at the center of the coal transportation network with all four major rail lines having a presence in the area, as well as the Ohio and Mississippi River barge traffic. Gulf lignite coal generally has much lower heat content and is, therefore, usually only transported short distances or used at mine mouth power plants.

The Western Region of the Interior is small in terms of production capacity and coal reserves. It is mainly comprised of Kansas and Oklahoma. These are bituminous coals that have high heat content and high sulfur content with a relatively high extraction cost. Oklahoma has some coal mines located on Federal leases that account for approximately 0.1 percent of Federal coal production.

5.4.3 Maintenance Leasing

Since the last remaining certified coal producing region was decertified in 1990, all Federal coal leasing has been made up of maintenance leases issued through the LBA process where tracts are nominated by an applicant (see **Section 5.3**). The areas where the BLM currently manages leases support a mature industry (i.e., existing mines that are well-established with all necessary infrastructure, equipment, rail facilities, etc.) and where opening new mines has proved to be cost prohibitive. This has led to the majority of existing lease sales only receiving one bid, typically from the operator of a mine adjacent to the new lease. While the Mineral Leasing Act, as amended, requires competitive leasing, the nature of the current coal industry is not generally conducive to multiple bidders bidding against each other for the same tract. The BLM, however, takes a number of steps in the LBA process to create as competitive an environment as possible.

In those unique areas where a lessee for an existing mine applies for a lease and other mines are nearby or adjacent, the BLM routinely reconfigures the proposed lease tract to try to make the tract attractive as a potential maintenance lease for those other nearby or adjacent mines, in addition to the applicant. However, the majority of coal mines do not adjoin or abut another

coal mine, and even if the mines adjoin or abut, the prospective lease might not be reconfigured for increased competition due to local physical limitations in geology and ownership.

The BLM recognizes that to remain truly competitive in a one-bidder environment, the pre-sale estimate of the tract's FMV must not only be factually supported and defensible, but also kept confidential. For a bidder to successfully win a Federal coal lease sale, the bid must meet or exceed the BLM's pre-sale estimated FMV. The BLM follows established appraisal methods in estimating the value, and the Office of Valuation Services (OVS), Division of Mineral Evaluation (DME) reviews each evaluation to assure it follows established procedures, is rational, and is supported by facts.

The BLM's pre-sale estimated FMV functions similarly to a "reserve value" in an auction. The result is that even if a sale receives only one bid, the bidder is "playing against the house" with the BLM's confidential pre-sale FMV estimate representing the lowest possible bid that can be accepted. After the coal lease sale, the BLM reviews the bids received and if none meets or exceeds the pre-sale estimated FMV (as reviewed by OVS), the BLM will reject all bids and may, at its discretion, re-offer a lease sale. Therefore, the lease applicant is cognizant of the real possibility that the years of planning and NEPA review and associated costs may result in not being awarded the lease if they do not provide a sufficient bid.

As seen in **Figure 5-3** below, over the period from 1990 to 2015, the BLM has generally leased Federal coal at approximately the same rate it has been mined. This trend supports the goal of the FCLAA to restrict speculation in Federal coal reserves. Leasing Federal coal at a rate that exceeds the rate at which it has been mined would be an indicator of increased speculation. Since 2012, the amount of Federal coal leased has been significantly less than the amount of Federal coal mined. This drop in leasing levels is reflective of the decline in the US and global coal market (see **Section 5.4.5**).

5.4.4 Reserves

The United States leads the world in demonstrated reserve base for coal. As of 2016, the EIA estimated the United States had 477 billion tons of a demonstrated reserve base with approximately 255 billion tons being identified as recoverable.³⁴ Recoverable reserves at currently producing mines are approximately 18.3 billion tons.

Averaged across all Federal leases, at the end of 2015, there were approximately 20 years of production of Federal coal reserves under lease, assuming continued production at recent levels (approximately 375,000,000

³⁴ US EIA. 2016. US Coal Reserves. November 4, 2016. Available at <http://www.eia.gov/coal/reserves/>

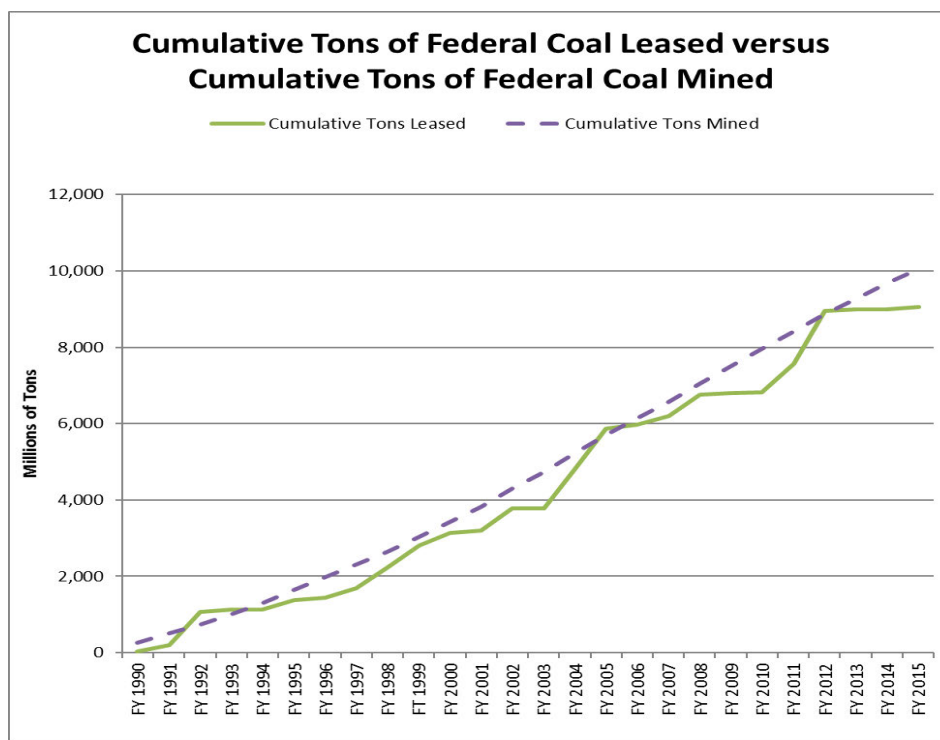


Figure 5-3. Cumulative Tons of Federal Coal Leased Versus Mined

Source: BLM 2016³⁵

tons/year in 2015).³⁶ It is important to put this number into context, however, since it represents an average.

Mines under existing lease in the Powder River Basin, which accounts for nearly 90 percent of the total annual Federal coal production, cumulatively hold approximately 25 years of Federal reserves, assuming current production levels.^{37,38,39,40} But for states and especially for individual mines, both within and outside of the Powder River Basin, there is quite a lot of variation in the years of remaining Federal reserves.

For instance, since Kentucky has a relatively small amount of leased Federal reserves (approximately 4.8 million tons) and low annual Federal production

³⁵ BLM. 2016. Total Federal Coal Leases in Effect, Total Acres Under Lease, and Lease Sales by Fiscal Year Since 1990. July 7, 2016. Available at https://www.blm.gov/wo/st/en/prog/energy/coal_and_non-energy/coal_lease_table.html

³⁶ Office of Natural Resource Revenue. 2016. Production Data. Available at <https://www.onrr.gov/About/production-data.htm>;

³⁷ Ibid.

³⁸ BLM. 2016. Powder River Basin Coal. May 20, 2016. Available at https://www.blm.gov/wy/st/en/programs/energy/Coal_Resources/PRB_Coal/deq_aqd.html,

³⁹ BLM. 2016. Powder River Basin Coal Production. May 6, 2016. Available at https://www.blm.gov/wy/st/en/programs/energy/Coal_Resources/PRB_Coal/production.html,

⁴⁰ BLM. 2014. Powder River Basin Coal Review. August 12, 2014. Available at https://www.blm.gov/wy/st/en/programs/energy/Coal_Resources/PRB_Coal/prbdocs.html

(approximately 29,000 tons in 2016), the state has nearly 160 years of production remaining in Federal coal leases, assuming current production levels. Utah, on the other hand, has approximately 96 million tons of Federal reserves leased with an annual Federal production of about 12 million tons in 2016. This amounts to approximately 8 years of remaining Federal reserves, assuming current production levels.⁴¹

The BLM estimates that, as of September 2016, there are approximately 7.4 billion short tons of coal reserves available under existing leases (see **Table 5-1**).⁴²

Table 5-1
Coal Reserves on Federal Lands

Estimated Recoverable Coal Reserves on Federal Lands (End of FY 2016)	
	Quantity (1000 tons)
Powder River Basin	6,393,976
Colorado	422,678
Utah	96,255
All Other	487,638
Total	7,400,547

Source: Department of Interior 2016⁴³

5.4.5 Production

The BLM currently administers 306 coal leases encompassing over 462,000 acres in 10 states, with an estimated 7.4 billion tons of recoverable coal. Between 80 and 90 percent of coal produced in the United States is used for domestic electricity generation, with the remainder primarily being exported and used for industrial purposes.^{44,45,46} In 2015, US coal production levels experienced one of its steepest declines since recordkeeping began. Production levels decreased from over 1 billion tons in 2014 to just under 0.9 billion tons in 2015.⁴⁷

⁴¹ BLM. 2016. Total Federal Coal Leases in Effect, Total Acres Under Lease, and Lease Sales by Fiscal Year Since 1990. July 7, 2016. Available at https://www.blm.gov/wo/st/en/prog/energy/coal_and_non-energy/coal_lease_table.html

⁴² US Department of Interior. 2016. Agency Financial Report Fiscal Year 2016. Available at https://www.doi.gov/sites/doi.gov/files/uploads/doi_fy_2016_afr.pdf

⁴³ Ibid.

⁴⁴ US EIA. 2013. Monthly Generation Data by State, Producer Sector and Energy Source; Months through December 2013. Available at <http://www.eia.gov/electricity/monthly/>

⁴⁵ US EIA. 2013. Electric Power Monthly, September 2013 publication date, data for July 2013. Tables 1.6.A, 1.7.A, and 5.6.A. Available at <https://www.eia.gov/electricity/monthly/>

⁴⁶ In 2015, domestic coal purchases per EIA Form 923 equaled about 85 percent of coal production (MSHA, Form OSM-1).

⁴⁷ US EIA. 2015. Annual Coal Report. Coal Production and Number of Mines by State and Mine Type, 2015 and 2014. Available at <https://www.eia.gov/coal/data.php#production>

Table 5-2 includes Federal coal production data provided by the ONRR for the years 2006, 2010, and 2015, which show a decline of approximately 81 million tons between 2010 and 2015. Coal exports are described in **Sections 5.4.6 and 5.5.3**).

Table 5-2
Federal Coal Production (tons)

State	2006	2010	2015
Colorado	20,811,927	16,137,065	6,591,181
Montana	18,072,165	17,741,873	14,477,637
North Dakota	3,196,317	338,405*	5,261,915
Oklahoma	725,099	516,450	498,360
Utah	10,097,980	6,219,884	5,469,603
WY	369,856,067	397,535,690	313,790,093
Other*	22,435,709	18,396,804	29,472,084
Grand Total	445,195,265	456,886,171	375,560,873

Source. United States Extractive Industries Transparency Initiative (USEITI). 2015⁴⁸

*"Other" reflects coal produced on Federal leases, but state and county information is withheld in order to not reveal proprietary data. For example, North Dakota production from Mercer County is withheld in 2010 due to proprietary data concerns, and instead placed in the "other" category.

According to the most recent EIA Short-Term Outlook, 2016 coal production is expected to decrease by 138 million tons (15 percent), which would be the largest annual decline based on data going back to 1949.⁴⁹ These reductions have been felt most sharply in the Appalachian basin, particularly Central Appalachian coal, but are also observed in other basins with significant declines in the Powder River Basin production. These reduced production levels are driven by a variety of factors, including low natural gas prices, which drives some displacement of coal-fired electric generation by natural gas-fired generation.⁵⁰ In addition to low natural gas prices, reduced electricity demand growth, pollution control requirements, and a number of other reasons are cited by the EIA and industry for recent coal plant retirements that totaled 41 gigawatts (GW) between 2010 and 2015.^{51,52} The coal plants anticipated to retire between 2015 and 2022 accounted for 30 GW and 56 million tons of 2014 coal deliveries. From the Powder River Basin alone, over 32 million tons of 2014 Powder River Basin deliveries (9 percent) were to plants expected to

⁴⁸ United States Extractive Industries Transparency Initiative (USEITI). 2015. Federal Production by Location. Available at <https://useiti.doi.gov/downloads/federal-production/>

⁴⁹ US EIA. 2016. Short-Term Outlook. December 6, 2016. Available at <https://www.eia.gov/forecasts/steo/report/coal.cfm>

⁵⁰ Ibid.

⁵¹ See for example, US EIA. 2014. Planned coal-fired power plant retirements continue to increase. March 30, 2014. Available at <http://www.eia.gov/todayinenergy/detail.php?id=15491>

⁵² US EIA. 2015 Form 860. Schedule 3 "Generator Data (Retired and Canceled Units)"

retire by 2022. These drivers, along with other market and regulator drivers, are discussed in more detail below.

Coal prices have fallen in recent years, in large part due to shrinking demand. As annual coal production in 2016 is expected to be more than 24 percent lower than 2014 levels, producers have focused on minimizing coal production costs and closing higher cost mines over the past several years.⁵³ Lower petroleum prices have also helped reduce mining cost. The nationwide average delivered coal price was \$2.38/mmBtu in 2012, but dropped to \$2.14/mmBtu by 2016.⁵⁴

5.4.6 Main Drivers of Coal Demand

The demand for US coal is driven by a variety of market and regulatory factors. Electricity demand growth, installed coal-fired generating capacity, the relative prices of alternative fuel sources, coal demand from the domestic metallurgical and industrial markets, net US exports of coal, and existing and proposed environmental rules all affect the future supply and demand for US coals, which in turn affect coal pricing. The price of US coals drives domestic coal production. Several of the market and regulatory drivers impacting coal-fired electricity production and, consequently, demand for US coal production are highlighted below.

Market Drivers

Natural Gas Price

The availability and the price of natural gas is one of the single biggest drivers of US coal demand. As noted above, the bulk of coal demand in the United States stems from electricity generation. As a fuel for electricity generation, coal primarily competes with natural gas generation, as both are dispatchable resources that can be ramped up or down in response to market dynamics. Together, the two fuel sources account for approximately two-thirds of the electricity generated in the United States.

The breakthroughs in the cost and performance of hydraulic fracturing technology in the late 2000s increased the supply of domestic natural gas for electricity generation while lowering the cost. The Henry Hub natural gas spot price dropped significantly following this technology maturation. Prices were near \$13.00/mmBtu in June of 2008, but had dropped to less than \$3/mmBtu in June of 2015.⁵⁵ Natural gas gross withdrawals rose by more than 25 percent over this time frame.⁵⁶

⁵³ US EIA. 2016. Short-Term Energy Outlook. US Coal Production Figure. December 2016. Available at <http://www.eia.gov/forecasts/steo/data.cfm?type=figures>

⁵⁴ US EIA. 2016. Short-term Energy Outlook. December 6, 2016. Available at <http://www.eia.gov/beta/steo/#?v=8>

⁵⁵ US EIA. 2016. Henry Hub Natural Gas Spot Price. Available at <https://www.eia.gov/dnav/ng/hist/rngwhhdd.htm>

⁵⁶ US EIA. 2016. Natural Gas Gross Withdrawals and Production. Available at https://www.eia.gov/dnav/ng/ng_prod_sum_a_EPG0_FGW_mmc_f_a.htm

The lower natural gas price enabled natural gas-fired generation to become more competitive with coal-fired generation. In 2005, coal-fired generation accounted for approximately 50 percent of the domestic electricity generation, and natural gas generation was less than 20 percent. In 2015, with the increased supply and reduced price of natural gas, each fuel constituted approximately one-third of US electricity generation.⁵⁷ The reduction in natural gas price also spurred a significant build out in new natural gas-fired combined-cycle power plants. Since the beginning of 2012, 24 GW of new natural gas-fired combined-cycle power plants have been built while less than 5.9 GW of coal-fired power plants have been added to the grid during the same period.⁵⁸ New natural gas combined-cycle generation units have seen significant decreases in the expected levelized cost of electricity (LCOE). EIA's Annual Energy Outlook projections for the technology LCOE dropped to below \$50/MWh in some regions while the projected LCOE for new conventional coal remains near \$100/MWh. The combined drop in fuel cost and generating technology cost for natural-gas generation makes it difficult for new coal generation to compete.^{59,60}

Renewable Energy

Wind and solar generation have also grown significantly in recent years and have provided another source of competition for fossil-fuels in electricity generation. These technologies have low variable operating costs and will, therefore, once built, generally be deployed before any fossil-fuel source. The combined total generation from these two sources in 2005 provided less than 1 percent of the country's electricity generation, but represented more than 5 percent by 2015.⁶¹ The growth is driven by improvements in performance and reductions in the cost of the renewable energy technology. Policy measures, such as renewable energy tax credits and state renewable energy portfolio standards, create an additional push for the expansion of renewable energy generation. The 2016

⁵⁷ US EIA. 2016. Net Generation for All Sectors, Annual. Electricity Data Browser. Available at <http://www.eia.gov/electricity/data/browser/#/topic/0?agg=2,0,I&fuel=vtvv&geo=g&sec=g&linechart=ELEC.GEN.AL-L-US-99.A~ELEC.GEN.COW-US-99.A~ELEC.GEN.NG-US-99.A~ELEC.GEN.NUC-US-99.A~ELEC.GEN.HYC-US-99.A~ELEC.GEN.WND-US-99.A~ELEC.GEN.TSN-US-99.A&columnchart=ELEC.GEN.ALL-US-99.A~ELEC.GEN.COW-US-99.A~ELEC.GEN.NG-US-99.A~ELEC.GEN.NUC-US-99.A~ELEC.GEN.HYC-US-99.A~ELEC.GEN.WND-US-99.A&map=ELEC.GEN.ALL-US-99.A&freq=A&ctype=linechart<ype=pin&rtype=s&maptype=0&rse=0&pin=>

⁵⁸ US EIA. 2015. Form EIA 860 Data – Schedule 3, “Generator Data.” Available at <http://www.eia.gov/electricity/data/eia860/>

⁵⁹ The White House. 2016. US Mid-Century Strategy for Deep Decarbonization. November 2016. p.26. Available at https://www.whitehouse.gov/sites/default/files/docs/mid_century_strategy_report-final.pdf.

⁶⁰ EIA. 2016. Levelized Cost and Levelized Avoided Cost of New Generation Resources in the Annual Energy Outlook 2016. Available at http://www.eia.gov/outlooks/aeo/pdf/electricity_generation.pdf

⁶¹ US EIA. 2016. Net Generation for All Sectors, Annual. Electricity Data Browser. Available at <http://www.eia.gov/electricity/data/browser/#/topic/0?agg=2,0,I&fuel=vtvv&geo=g&sec=g&linechart=ELEC.GEN.AL-L-US-99.A~ELEC.GEN.COW-US-99.A~ELEC.GEN.NG-US-99.A~ELEC.GEN.NUC-US-99.A~ELEC.GEN.HYC-US-99.A~ELEC.GEN.WND-US-99.A~ELEC.GEN.TSN-US-99.A&columnchart=ELEC.GEN.ALL-US-99.A~ELEC.GEN.COW-US-99.A~ELEC.GEN.NG-US-99.A~ELEC.GEN.NUC-US-99.A~ELEC.GEN.HYC-US-99.A~ELEC.GEN.WND-US-99.A&map=ELEC.GEN.ALL-US-99.A&freq=A&ctype=linechart<ype=pin&rtype=s&maptype=0&rse=0&pin=>

Annual Energy Outlook reference case anticipates that renewable energy generation will continue to grow by 3.6 percent per year on average between 2015 and 2040.⁶² This growth in renewable energy generation is expected to add to the downward pressure on coal demand. Both wind and solar generation have seen precipitous drops in projected LCOE for new generation, both dropping to averages well below \$100/MWh and, therefore, less than new coal, in the latest Annual Energy Outlook reference case.⁶³

Electricity Demand

Electricity demand has leveled off in recent years in the wake of the 2009 recession due to both slower economic growth and advancements in demand-side energy efficiency. Demand growth has slowed every decade since the 1950s when it was above 10 percent per year, but it has reached new lows since the 2009 recession with some years even experiencing negative demand growth.⁶⁴ The 2016 Annual Energy Outlook reference case anticipates average growth of 0.9 percent from 2015 to 2040.⁶⁵ As the largest source for coal demand, this slow rate of electricity demand growth limits the opportunity for increased coal production.

Exports

The high price and high demand for coal in Asian markets at the beginning of the decade has rapidly subsided. The Newcastle, Australia benchmark thermal coal price was approximately \$145/ton in 2011, but experienced continued and steady decline down to \$53/ton in June of 2016.⁶⁶ Slow global economic growth, decoupling of electricity demand with China's gross domestic product, protectionist policies regarding China's domestic coal industry, aggressive air pollution mitigation policies in China's 13th Five-Year Plan that involve promoting non-coal alternatives, and a cancellation of most of the proposed Northwest coal export terminals have combined to significantly lower the expected levels of US coal exports.⁶⁷

Current total US coal export capacity is 234 million tons per year nationwide with 180 million tons being located on the East or Gulf Coast. Most US coal

⁶² US EIA. 2016. Annual Energy Outlook. Electricity Supply, Disposition, Prices, and Emissions. Available at <http://www.eia.gov/outlooks/aeo/data/browser/#/?id=8-AEO2016&cases=ref2016&sourcekey=0>

⁶³ The White House. 2016. US Mid-Century Strategy for Deep Decarbonization. November 2016. p.26. Available at https://www.whitehouse.gov/sites/default/files/docs/mid_century_strategy_report-final.pdf

⁶⁴ US EIA. 2016. Annual Energy Outlook 2016 with projections to 2040. MT-15. August 2016. Available at [http://www.eia.gov/forecasts/aeo/pdf/0383\(2016\).pdf](http://www.eia.gov/forecasts/aeo/pdf/0383(2016).pdf)

⁶⁵ Ibid.

⁶⁶ Williams-Derry, C. 2016. The Rise and Fall of the Asian Coal Bubble. Sightline Institute. Available at http://web.law.columbia.edu/sites/default/files/microsites/climate-change/williams_derry_the_rise_and_fall_of_the_asian_coal_bubble.pdf

⁶⁷ Climate Home. 2016. China's Five Year Plan to Radically Tighten Air Pollution Targets. November 3, 2016. Available at <http://www.climatechangenews.com/2016/03/11/chinas-five-year-plan-to-radically-tighten-air-pollution-targets/>

exports have been non-Federal coals and non-western coals and only use a fraction of this export capacity.⁶⁸ In 2015, coal export levels were 74 million tons.⁶⁹ Moreover, most of the coal exported is metallurgical coal and is exported from terminals in the eastern United States or the Gulf Coast.⁷⁰ Significant ramp-up in coal exports would require increased export infrastructure. Of the six large coal export terminals proposed since 2010 when Asian coal prices were enticing supplier interest, not one has been built or permitted. Moreover, support and permits for all but one of the projects have been withdrawn as international demand has weakened and resistance from local communities has increased. The one remaining project, Millennium Bulk Longview Terminal, is down to just one backer after Arch Coal sold its position in the project in 2016.⁷¹ Moody's financial services notes that export potential will remain capped by port capacity limitations.⁷²

Rail Availability

Rail shipments account for 67 percent of the coal shipped in the United States to power plants.⁷³ Western coal mines are primarily served by the Union Pacific and BNSF carriers, while Norfolk Southern and CSX are the dominant carriers in the eastern United States. In 2015, coal shipments accounted for 37 percent of the freight shipments in the rail industry and about 17 percent of the rail industry revenues.⁷⁴ With the fast growth of oil production in the Bakken Shale region, competition for rail space between coal and oil had sharpened in recent years and made it more difficult at times for coal companies to connect with utility consumers. Some power customers are beginning to hedge their coal deliveries by railroads with barge and truck delivery capability. However, in the arid west where most Federal coal is found, transportation distance from the mine is generally too great for truck transportation to be competitive with railways, and waterways are too limited in their occurrence and flowrates for

⁶⁸ Institute for Energy Economics and Financial Analysis. 2014. No Need for New US Coal Ports: Data Shows Oversupply in Capacity. November 19, 2014. Available at <http://www.ieefa.org/wp-content/uploads/2014/11/Sanzillo-port-capacity.pdf>

⁶⁹ US EIA. 2016. Today in Energy. US coal exports declined 23% in 2015, as coal imports remained steady. March 7, 2016. Available at <http://www.eia.gov/todayinenergy/detail.php?id=25252>

⁷⁰ US EIA. Coal Data Browser. Export quantity to total world of All coal 2015. Available at http://www.eia.gov/beta/coal/data/browser/#!/topic/41?agg=2,1,0&rank=ok&linechart=COALEXPORT_QTY.TOT-TOT-TOT.A&columnchart=COALEXPORT_QTY.TOT-TOT-TOT.A&map=COALEXPORT_QTY.TOT-TOT-TOT.A&freq=A&start=2001&end=2015&ctype=map<ype=pin&rtype=s&pin=&rse=0&maptype=0

⁷¹ Sightline Institute. 2016. Arch Coal Backs Out of Longview Export Terminal. May 27, 2016. Available at <http://www.sightline.org/2016/05/27/arch-coal-backs-out-of-longview-export-terminal/>

⁷² Zubets-Anderson, A. . 2016. "Bankruptcy and Financing Rating Agency's Perspective." Moody' Investor Service. Presented at the US Coal in the 21st Century: Markets, Bankruptcy, Finance and Law conference. Columbia Center on Global Energy Policy and the Sabin Center for Climate Change Law. September 2016. Summary Available at http://web.law.columbia.edu/sites/default/files/microsites/climate-change/panel_summaries_-_us_coal_in_the_21st_century.pdf

⁷³ US EIA. 2014. Today in Energy. Railroad deliveries continue to provide the majority of coal shipments to the power sector. June 11, 2014. Available at <http://www.eia.gov/todayinenergy/detail.cfm?id=16651>

⁷⁴ Association of American Railroad. 2016. Railroads and Coal. July 2016. Available at <https://www.aar.org/BackgroundPapers/Railroads%20and%20Coal.pdf>

barge transport to be viable. If competition for rail space among commodities continues to stiffen, it will put increasing upward pressure on delivered coal prices. The more recent downturn in oil prices and expansion in western rail capacity have alleviated some of the competition for rail space.

Current and Future Policy and Regulatory Drivers

Paris Agreement

On December 12, 2015, 196 Parties to the United Nations Framework Convention on Climate Change (UNFCCC or Paris Agreement) adopted a framework to coordinate climate change mitigation and adaptation efforts. The Paris Agreement aims to limit global warming to less than 2 degree Celsius by limiting the amount of greenhouse gas emissions and by increasing the amount of sequestration. This goal is put into operation through each country's submission of emission reduction goals, referred to as intended nationally determined contributions (INDCs). Countries will report their reduction targets every 5 years starting in 2020. Although emission reduction and climate change abatement strategies are still forthcoming to establish and achieve the INDCs, significant reductions in fossil fuel consumption are one likely component of many such plans and necessary to remain below the 2 degree Celsius target.⁷⁵

The EIA does not yet model the Agreement explicitly in its International Energy Outlook, as it is still awaiting more clarity on implementation strategies. However, as Federal, regional, or state emission reduction programs that reflect parallel carbon dioxide (CO₂) reduction efforts are codified into law through regulations, such as the CPP, Regional Greenhouse Gas Initiative, or Assembly Bill 32, they are captured in the EIA Annual Energy Outlook. The Paris Agreement is anticipated to apply downward pressure to coal consumption both domestically and internationally.

US-China Bilateral Agreement

The US-China Bilateral Agreement announced in November 2014 reflected significant commitments to CO₂ reductions by two of the world's largest CO₂ emitters, as well as two of the largest coal producers, consumers, and holders of reserves. The United States agreed to an emission reductions target of 26-28 percent below 2005 levels by 2025. China committed to peaking emissions around 2030. The two sides intend to cooperate on advanced coal technologies, nuclear energy, shale gas, and renewable energy to help optimize the energy mix

⁷⁵ Currently, the United States has committed to reduce net greenhouse gas emissions in the range of 17 percent by 2020 and 26-28 percent by 2025, relative to 2005 levels. This target is consistent with a straight-line emissions reduction pathway from 2020 to deep, economy-wide emission reductions of 80 percent or more by 2050. See International Energy Agency. 2015. Energy and Climate Change. p.150. Available at <https://www.iea.org/publications/freepublications/publication/WEO20>

and to reduce emissions, including from coal, in both countries.⁷⁶ These reduction targets would put additional downward pressure on coal demand.

North America Climate, Clean Energy, and Environment Partnership Action Plan

On June 29, 2016, the leaders of Canada, Mexico, and the United States announced a plan to pursue 50 percent clean power generation collectively by 2025. These carbon-free emissions sources would include renewable energy, nuclear generation, demand reduction through energy efficiency, and potential carbon capture and storage technologies. These carbon-free or low-carbon technologies would reduce the need for some carbon-intensive electricity generating sources, such as coal-fired power plants. The realization of this clean energy target would likely put downward pressure on domestic coal production relative to current projected levels.

Morocco Conference of the Parties (2016) and Mid-Century Strategy

On November 16, 2016, the United States submitted its Mid-Century Strategy for Deep Decarbonization to the United Nations Convention on Climate Change at the Conference of Parties hosted in Morocco.⁷⁷ The submission was consistent with the Paris Agreement's requirement to submit climate action plans called INDCs to keep global temperatures from rising by more than 2 degrees Celsius. While not policy prescriptive, the technical document highlights key opportunities and challenges for reducing CO₂ emissions 80 percent below 2005 levels by 2050. The Mid-Century Strategy for Deep Decarbonization illustrates pathways that include a deep decarbonization of the electricity sector that includes a decrease in coal's share of electricity generation. The amount of the decrease is expected to vary significantly depending on the future commercial deployment of carbon capture and sequestration, with enhanced use of carbon capture and sequestration associated with greater use of coal.

Clean Power Plan and the Carbon Pollution Standards

On August 3, 2015, the US Environmental Protection Agency (EPA) finalized the CPP as the first ever US national standards to address carbon pollution from existing power plants. Power plants are historically the largest source of greenhouse gas emissions in the United States, accounting for about 30 percent of the total. Coal has been the dominant fuel for power plants, and coal-fired power plants are, on average, the most carbon-intensive sources of electricity generation.

The CPP requires that states develop and implement plans to ensure the power plants in their state—either individually, together, or in combination with other measures—achieve the emission requirements starting in 2022, with full

⁷⁶ The White House. 2016. US-China Joint Announcement of Climate Change. November 11, 2014. Available at <https://www.whitehouse.gov/the-press-office/2014/11/11/us-china-joint-announcement-climate-change>

⁷⁷ The White House. 2016. US Mid-Century Strategy for Deep Decarbonization. November 2016. p.26. Available at https://www.whitehouse.gov/sites/default/files/docs/mid_century_strategy_report-final.pdf

implementation by 2030. The rule is also anticipated to trigger additional investment in demand-side energy efficiency, resulting in less overall demand for electricity generation. On February 9, 2016, the US Supreme Court issued a stay of the regulation, halting its implementation until the litigation concludes. On September 27, 2016, oral arguments were held in front of a 10-judge panel at the DC Circuit Court of Appeals.

While the CPP addressed emissions from existing power plants, the EPA also finalized the Carbon Pollution Standards on the same day in 2015 to reduce emissions from new, modified, and reconstructed sources.⁷⁸ This rule established standards for electric utility steam-generating units (generally coal-fired), along with stationary combustion turbines, that reflect the degree of emissions limitation achievable and consistent with the Clean Air Act requirements.

Mercury Air Toxics Standard

The EPA Mercury Air Toxics Standard was finalized in 2012, and its compliance requirements began in 2015 and 2016. The rule puts limits on toxic air pollution, including mercury, arsenic, and metals, from fossil-fuel-fired power plants. To comply with the rule's emission standards, many sources would need to install capital-intensive pollution control equipment, such as flue gas desulfurization or dry sorbent injection.

Cross-State Air Pollution Rule

On July 6, 2011, the EPA finalized the Cross-State Air Pollution Rule under section 110 of the Clean Air Act to protect downwind states from upwind sources of air pollution in other states. The rule places limits on the amount of SO₂ and nitrogen oxides (NO_x) emissions that the eastern states' power fleet may emit in a given year. It allows for limited emissions trading, but provides a mechanism to ensure that each state meets a specific level of reductions. Phase 1 of the rule went into effect in 2015, and phase 2 is scheduled to go into effect in 2017. In September of 2016, the EPA issued an update to the Cross-State Air Pollution Rule to incorporate the 2008 ozone National Ambient Air Quality Standards, which resulted in different, often tighter, state ozone-season NO_x emission limits for some of the affected states. By limiting the emissions of a pollutant associated with combusting coal, the rule is anticipated to put downward pressure on coal demand.

Coal Ash

In December 2014, the EPA finalized national regulations to provide a comprehensive set of requirements for the safe disposal of coal combustion residuals, commonly known as coal ash, from coal-fired power plants. The rule establishes technical requirements for coal combustion residual landfills and

⁷⁸ 80 FR 64510

surface impoundments under Subtitle D of the Resource Conservation and Recovery Act.

Effluent Limitations Guidelines

On September 30, 2015, the EPA finalized a revision to the discharge limitations for toxics in power plant wastewater. The rule will likely drive additional investment for some coal steam power plants to reduce current discharge rates to levels commensurate with the new regulatory requirements.

Clean Water Act 316(b)

This EPA rulemaking required certain impingement and entrainment safeguards at power plants for cooling water intake. This rule covered roughly 1,065 existing facilities that are designed to withdraw at least 2 million gallons per day of cooling water. The EPA estimates that 544 power plants are affected by this rule.

State Regulations and Programs

In addition to Federal and international drivers, there are numerous state drivers to reduce greenhouse gas emissions that may affect coal demand as well. For instance, California's Assembly Bill 32 is an economy-wide greenhouse gas emission reduction program for the state aimed at reducing greenhouse gas emissions to 1990 levels by 2020. The regional greenhouse gas initiative is a collective effort among nine New England and Mid-Atlantic states to reduce emissions from the power sector. Many states have clean energy and renewable energy incentives as well. As of late 2015, 29 states and the District of Columbia have renewable energy portfolio standards to support the development of renewable energy. New York State announced in August 2016, a new Clean Energy Standard that requires the utilities to procure 50 percent of the state's electricity from eligible clean energy sources by 2030. Similarly, in March 2016, Oregon adopted legislation that requires two large investor-owned utilities operating in the state to supply 50 percent of the state's electricity from renewable sources by 2040. The law also requires these utilities to phase out electricity from coal by 2030.

5.5 MARKET PROJECTIONS

A variety of government and private sector sources of energy market projections are available and will be considered as the PEIS process continues. Due to the large number of variables and assumptions inherent in forecasting energy markets, projections vary from model to model and from year to year as data is updated. The Energy Information Administration (EIA) notes that multiple organizations issue projections for the coal sector and compares projections for some key metrics in a report.⁷⁹ For the purposes of this scoping report, the BLM provides summaries of the projections from models used by the EIA and EPA. These are projections from particular versions and platforms

⁷⁹ US EIA. 2016. Annual Energy Outlook 2016. CP7 Available at http://www.eia.gov/outlooks/aeo/section_comparison.cfm

of those models, but the BLM notes that subsequent or alternative versions may contain different projections as assumptions are periodically updated. For instance, a 2017 version of a model may contain information and assumptions not known and, therefore, not included in the 2016 version. These are not predictions, but projections under one reasonable set of assumptions and current best available data.

On September 8, 2016, the Columbia School of Law's Sabin Center also hosted a workshop titled "US Coal in the 21st Century: Markets, Bankruptcy, Finance and Law," with panelist from financial, consulting, non-profit, government, and academic sectors. Panelists generally highlighted the growing market headwinds against coal, primarily due to lower cost gas and renewable generation, and mid- and long-term outlooks that showed coal demand well below historical levels.⁸⁰ These findings are consistent with some of the recent modeling and forecasts by the EIA and the EPA discussed below.

5.5.1 Energy Information Administration

The EIA Annual Energy Outlook released in 2016 provides projections for energy markets, including US coal and electricity markets using the National Energy Modeling System model. The most recent version contained a reference case reflecting the known technology and regulatory environment.⁸¹ The outlook contains projections for the energy sectors through 2040. The 2016 reference case included a mass-based version of the CPP implementation. The Annual Energy Outlook projections for US coal consumption, production, and prices from the reference case are discussed below.

In the Annual Energy Outlook 2016 reference case, coal's share of total US electricity generation is projected to drop from 33 percent in 2015 to 21 percent in 2030 and 18 percent in 2040. Total coal production is projected to fall from 896 million tons in 2015 down to 827 million tons in 2022 when CPP compliance begins, and drop down to 664 million tons in 2030 at full CPP compliance.⁸²

In the near term, coal generation resumes its role as the largest source of US electricity, but natural gas generation is projected to surpass it by the late 2020s in the reference scenario. Renewable generation is also projected to surpass coal generation by 2030 due to a combination of environmental policies, Federal

⁸⁰ A summary of the panel discussions conducted during the US Coal in the 21st Century: Markets, Bankruptcy, Finance and Law workshop, as well as presentations offered by the panelists in PDF and PPT format, can be found in Volume 2 of this scoping report.

⁸¹ The EIA Annual Energy Outlook also includes a variety of side cases that offer projections under alternative market, macroeconomic, and regulatory assumptions.

⁸² US EIA. 2016. Annual Energy Outlook 2016 Early Release: Annotated Summary of Two Cases. May 17, 2016. Available at [https://www.eia.gov/forecasts/aeo/er/pdf/0383er\(2016\).pdf](https://www.eia.gov/forecasts/aeo/er/pdf/0383er(2016).pdf)

tax incentives, and declining capital cost.⁸³ The reference case projects 45 GW of US coal-fired power plant retirements in the near term (by end of 2016) due to low natural gas prices and implementation of the EPA's Mercury and Air Toxics Standard. This leaves 226 GW of coal remaining in service in 2016. Another 56 GW of that capacity is projected from coal-fired power plant retirements by 2040, leaving 170 GW of coal-fired power plant capacity in service. The United States is projected to be a small net exporter of coal through the 2040 time horizon.⁸⁴

In the western coal markets, where over 99 percent of Federally mined coal is located, the Annual Energy Outlook reference case projects the most significant decline in coal production, with levels dropping from current levels near 500 million tons to 378 million tons in 2030 and 329 million tons in 2040.⁸⁵ This drop accounts for 52 percent of the projected nationwide decline in coal production by 2030.

The 2016 Annual Energy Outlook projects that real average mine mouth coal prices rise due to falling productivity as geological conditions become less favorable. In the reference scenario, 2015 average mine mouth prices of \$33.80 per short ton are expected to remain mostly flat at \$33.84 through 2030 and then up to \$38.68 by 2040.^{86,87} For the western states, where coal prices are below the nationwide average due to a variety of factors, including more favorable geology, reference case prices are anticipated to climb from 2015 levels of \$18.7 per ton to \$19 per ton in 2030 and \$21.6 per ton in 2040.⁸⁸

5.5.2 Environmental Protection Agency

The EPA maintains an application of the Integrated Planning Model (IPM) to analyze the impact of power sector regulations. The IPM is a linear programming, least-cost optimization model of the US power sector developed by ICF consulting. It provides forecasts of least-cost capacity expansion and electricity dispatch to meet energy demand subject to market and regulatory

⁸³ US EIA. 2016. Annual Energy Outlook. Forecast Data. Available at <http://www.eia.gov/forecasts/aeo/data/browser/#!/?id=8-AEO2016®ion=0-0&cases=ref2016&start=2014&end=2040&f=A&linechart=ref2016-d032416a.6-8-AEO2016&sourcekey=0>

⁸⁴ US EIA. 2016. Annual Energy Outlook 2016 Early Release: Annotated Summary of Two Cases. May 17, 2016. Available at [https://www.eia.gov/forecasts/aeo/er/pdf/0383er\(2016\).pdf](https://www.eia.gov/forecasts/aeo/er/pdf/0383er(2016).pdf)

⁸⁵ US EIA. 2016. Annual Energy Outlook 2016. Table: Coal Supply, Disposition, and Prices. Available at http://www.eia.gov/forecasts/aeo/data/browser/#!/?id=15-AEO2016&cases=ref2016~ref_no_cpp&sourcekey=0

⁸⁶ 2015 prices available EIA. 2015. Annual Coal Report. Available at <http://www.eia.gov/coal/annual/pdf/acr.pdf>. Projected 2030 and 2040 prices available in US EIA 2016. See: US EIA. 2016 Annual Energy Outlook in Coal Supply, Disposition, and Prices Table. Available at <http://www.eia.gov/outlooks/aeo/data/browser/#!/?id=15-AEO2016&cases=ref2016&sourcekey=0>

⁸⁷ Projected 2030 and 2040 prices available in US EIA 2016. See: US EIA 2016. Annual Energy Outlook in Coal Supply, Disposition, and Prices Table. Available at <http://www.eia.gov/outlooks/aeo/data/browser/#!/?id=15-AEO2016&cases=ref2016&sourcekey=0>

⁸⁸ US EIA. 2016. Annual Energy Outlook 2016. Coal Production and Minemouth Prices by Region. Available at http://www.eia.gov/outlooks/aeo/data/browser/#!/?id=94-AEO2016&cases=ref2016~ref_no_cpp&sourcekey=0

factors. It captures a wide range of issues related to the power sector, including fuel markets such as coal. The model is widely used by the government and industry to assess policy and market influences.⁸⁹

The EPA's Regulatory Impact Analysis for the CPP was informed by IPM modeling conducted that reflects market and regulatory outlooks, as well as the final CPP emission limitations.⁹⁰ This scenario includes projections on coal production and consumption through a 2050 time frame, as coal is an instrumental commodity to power sector operations, and, thus, its demand is shaped by power-sector regulations. The EPA application of IPM to reflect the CPP provides projections for the power sector comparable to the Annual Energy Outlook reference scenario. The IPM projections are specific to US thermal coal markets.

In the EPA's modeling of the mass-based CPP, nationwide coal generation was projected to be 28 percent and 25 percent of electricity generation in 2030 and 2040, respectively. These levels reflected more demand-side energy efficiency and more renewable generation relative to today's levels, which allow for a more balanced nationwide generation portfolio. This coal-fired generation totaled 1,144 Terawatt hours (TWh) in 2030 and 1,092 TWh in 2040 and corresponded to about 685 and 692 million tons of US coal production in those same years.⁹¹

Under this model, renewable electricity generation is projected to be a larger share of total electricity generation by 2040. There is also a significant amount of coal-fired power plant retirements due to an aging fleet, more competitive capital cost for competing technologies, lower gas prices, and lower demand growth. The EPA modeling projects 174 GW remaining in service in the CPP scenario in 2030 and 170 GW in 2040.

In the western coal basins, the EPA application of IPM projected coal production decreasing from current levels of 484 million tons to 317 million tons in the CPP scenario by 2030. The decrease is driven, in part, by increased inter-basin competition as eastern interior coal becomes more competitive due to advances in low-cost, long-wall mining technologies and because of less consumer sensitivity to the higher sulfur content of interior coal as more plants install flue-gas desulfurization equipment.

⁸⁹ US EPA. 2013. Documentation for Base Case v.5.13 Modeling Framework. Chapter 2: Modeling Framework. November 27, 2013. Available at <https://www.epa.gov/airmarkets/documentation-base-case-v513-modeling-framework>

⁹⁰ US EPA. 2015. Regulatory Impact Analysis for the Clean Power Plan Final Rule. Table 3-11. October 23, 2015. Available at <https://www.epa.gov/sites/production/files/2015-08/documents/cpp-final-rule-ria.pdf>

⁹¹ The uptick in production in spite of the drop in coal-fired power plant electricity generation is due to increased demand from industrial sources and exports in 2040.

Projected coal prices are similar to the Annual Energy Outlook 2016 outlook. For western coals they are in the \$20/ton to \$24/ton range, and nationwide they are in a \$35/ton to \$40/ton range for years 2030 to 2040.⁹² Western coal prices remain the lowest in the country on a per ton and a per Btu basis among all major coal producing regions reflecting the high productivity and low production cost characteristic of that region.⁹³

5.5.3 Coal Exports

Global coal pricing is US dollar-denominated. As the US dollar strengthens relative to other currencies, US coal becomes more expensive relative to coal exported from competing countries. As the US dollar weakens, US coal becomes relatively more competitive.

Coal exports accounted for a small share, approximately 8 percent, of total US coal production in 2015 at 74 million tons.^{94,95} The majority of that export is metallurgical coal, primarily used for industrial purposes, which comes from non-Federal lands. The amount of thermal coal, the predominant coal type produced on Federal lands, exported was 28 million tons or approximately 3 percent of total US production in 2015.⁹⁶ The 2016 EIA Annual Energy Outlook projections for total coal export going forward are relatively flat through 2030 and then increase upward by approximately 20 million tons, from current levels of 74 million tons, and constitute approximately 15 percent of total US production in 2040.⁹⁷ The US thermal coal portion of coal exports is projected to follow a similar trajectory but increase at a higher rate, reaching 56 million tons or approximately 9 percent of total production by 2040.⁹⁸ This uptick from 2015 levels is partially due to reduced US demand. But even with the reduced US demand, these projected steam coal export levels reflect a relatively small portion of US production and do not exceed 2012 tonnage export levels.⁹⁹

In all scenarios examined, projected coal exports have declined from prior year projections and are anticipated to remain a small source of demand for US coal

⁹² All EPA IPM coal prices are listed in \$ per short ton.

⁹³ US EPA. 2015. Analysis of the Clean Power Plan. August 3, 2015. Available at <https://www.epa.gov/airmarkets/analysis-clean-power-plan>

⁹⁴ US EIA. 2015. Annual Coal Report 2015. November 2016. Available at <http://www.eia.gov/coal/annual/pdf/acr.pdf>

⁹⁵ US EIA. 2016. Today in Energy. US coal exports declined 23% in 2015, as coal imports remained steady. March 7, 2016. Available at <http://www.eia.gov/todayinenergy/detail.php?id=25252>

⁹⁶ US EIA. 2016. Coal Data Browser. Available at http://www.eia.gov/beta/coal/data/browser/#!/topic/41?agg=2,1,0&rank=ok&linechart=COAL.EXPORT_QTY.TOT-TOT-TOT.A&columnchart=COAL.EXPORT_QTY.TOT-TOT-TOT.A&map=COAL.EXPORT_QTY.TOT-TOT-TOT.A&freq=A&start=2001&end=2015&ctype=map<ype=pin&rtype=s&pin=&rse=0&maptype=0

⁹⁷ US EIA. 2016. 2016 Annual Energy Outlook. Available at http://www.eia.gov/forecasts/aeo/data/browser/#!/?id=15-AEO2016®ion=0-0&cases=ref2016~ref_no_cpp&start=2013&end=2040&f=A&sourcekey=0

⁹⁸ US EIA. 2016. Annual Energy Outlook 2016. Table: World Steam Coal Flows by Importing Regions and Exporting Countries. Available at <http://www.eia.gov/forecasts/aeo/data/browser/#!/?id=96-AEO2016&cases=ref2016&sourcekey=0>

⁹⁹ US EIA. 2016. Imports Data. Available at <http://www.eia.gov/coal/data.php#imports>

production. US coal export is generally viewed as a swing supplier of international markets, meaning it is one of the last suppliers to serve international markets after other exporting countries are at capacity, and one of the first exporting countries to pull back supply as demand goes down. Export demand has a significant degree of uncertainty related to currency valuations, international economic growth, climate policy, and trade protectionist policies from importing countries. In addition, the upward reaches of US steam coal export are limited in the near and medium term by export terminal capacity in the northwestern United States.¹⁰⁰

5.6 GREENHOUSE GAS EMISSIONS

Greenhouse gas emissions trap heat in the atmosphere and, as emissions and atmospheric concentrations have increased, are associated with an increase of 1.5 degrees Fahrenheit in average global temperatures over the past century.¹⁰¹ These increases in global mean temperature drive changes in climate and weather patterns. CO₂ is the most abundant form of greenhouse gas. CO₂ enters the atmosphere through the burning of fossil fuels, such as coal, natural gas, and oil, and accounts for 82 percent of total US greenhouse gas emissions in 2014. Other greenhouse gases, such as methane, are emitted during the production of fossil fuels. Each greenhouse gas has a different atmospheric lifetime and radiative forcing (heat trapping) potential. Their emission volumes can be converted to a CO₂ equivalent (CO₂e) to normalize the greenhouse effect across different pollutants.

In 2014, total US emissions were 6,870 million metric tons of CO₂e.¹⁰² Electricity generation was the largest greenhouse gas emitting sector in the United States, accounting for 30 percent, or 2,081 million metric tons, of CO₂e in 2014.¹⁰³ US coal production and combustion were responsible for more than 1,720 million metric tons, or about 25 percent, of US greenhouse gas emissions.¹⁰⁴ Most of these coal-related emissions (1,570 million metric tons) occur at the point of combustion within the electricity sector. Industrial CO₂e emissions from coal combustion added another 75 million tons of CO₂e. Coal extraction activities (without considering combustion emissions) account for

¹⁰⁰ Zubets-Anderson, A. . 2016. "Bankruptcy and Financing Rating Agency's Perspective." Moody' Investor Service. Presented at the US Coal in the 21st Century: Markets, Bankruptcy, Finance and Law conference. Columbia Center on Global Energy Policy and the Sabin Center for Climate Change Law. September 2016. Summary Available at http://web.law.columbia.edu/sites/default/files/microsites/climate-change/panel_summaries_-_us_coal_in_the_21st_century.pdf

¹⁰¹ US EPA. 2016. Climate Change: Basic Information. Available at <https://www.epa.gov/climatechange/climate-change-basic-information>

¹⁰² US EPA. 2016. Greenhouse Gas Inventory Report: 1990-2014. Table 2-11. April 15, 2016. Available at <https://www3.epa.gov/climatechange/Downloads/ghgemissions/US-GHG-Inventory-2016-Main-Text.pdf>

¹⁰³ Ibid.

¹⁰⁴ Ibid.

approximately 68 million metric tons of CO₂e.¹⁰⁵ Abandoned underground coal mines added another 6.3 million metric tons of CO₂e emissions.

The domestic electricity sector drives between 80 and 90 percent of the US coal consumption each year. Coal combustion for electricity is more carbon intensive than other fossil fuels, accounting for 75 percent of the CO₂ emissions from the electricity sector even though it accounts for only 39 percent of the total electricity generated in 2014.¹⁰⁶

With respect to federally owned coal, as stated, 42 percent of total US coal production occurred on Federal lands in 2015.^{107,108} Using data available at the time, a report by Stratus Consulting states that in 2012 the combustion of Federal coal and coalbed methane emissions resulting from Federal coal production together accounted for nearly 770 million metric tons of CO₂e emissions, or over 10 percent of total US greenhouse gas emissions.¹⁰⁹ Estimates by BLM using more recent data suggest that as of 2014, CO₂ emissions attributable to federal coal accounted for 11 percent of total US greenhouse gases and a recent report noted that they account for 13 percent of all US energy-related CO₂ emissions.¹¹⁰

Greenhouse gas emissions associated with coal production can generally be divided into two broad categories: upstream emissions associated with the mining and transportation of the coal, and downstream emissions associated with the combustion of the coal. The greenhouse gas implications of each category are discussed below.

5.6.1 Upstream Emissions

Measuring the level and source of greenhouse gas emissions from coal production and consumption starts with emissions released during coal mining. These upstream greenhouse gas emissions primarily occur in the form of methane released from coal seams to the atmosphere in the coal mining

¹⁰⁵ US EPA. 2016. Inventory of US Greenhouse Gas Emissions and Sinks: 1990 – 2014. April 15, 2016. pp.1-17. Available at <https://www.epa.gov/sites/production/files/2016-04/documents/us-ghg-inventory-2016-main-text.pdf>

¹⁰⁶ US EIA. 2015. Table I.1. Total Electric Power Industry Summary Statistics, 2015 and 2014. Available at http://www.eia.gov/electricity/annual/html/epa_01_01.html.

Although 2015 US greenhouse gas inventory data is not yet available, 2015 EIA generation data suggest that coal generation dropped to 33 percent of total electricity generation. See EIA 2016. 2016 Annual Energy Outlook. Table IFI-3. November 2016. Available at [http://www.eia.gov/forecasts/aeo/pdf/0383\(2016\).pdf](http://www.eia.gov/forecasts/aeo/pdf/0383(2016).pdf)

¹⁰⁷ US Extractive Industries Transparency Initiative. 2015. Full dataset. Table I. Available at <https://useiti.doi.gov/downloads/federal-production/>

¹⁰⁸ US EIA. 2016. Annual Coal Report. November 3, 2016. Available at <http://www.eia.gov/coal/annual/>

¹⁰⁹ Stratus Consulting. 2014. Greenhouse Gas Emissions from Fossil Energy Extracted from Federal Lands and Waters: An Update. Prepared for The Wilderness Society. December 23, 2014. Available at https://cdn.americanprogress.org/wpcontent/uploads/2015/03/WildernessSociety_GHGEmissions_12-23Revisions.pdf

¹¹⁰ Gillingham et. al. 2016. Federal Minerals Leasing Reform and Climate Policy. The Hamilton Project. Brookings. December 2016.

process. Methane is a potent greenhouse gas that has approximately 25 times more warming potential than carbon dioxide over a 100-year life period. It is the second-most prevalent greenhouse gas from human activities in the United States and accounts for approximately 10 percent of all US greenhouse gases. Coal mining accounts for approximately 9 percent of total US methane emissions.¹¹¹ The amount of average methane release associated with removing a ton of coal varies significantly depending on whether it occurs at an underground or at a surface mine. Underground mines contain more methane, as they are under more geological pressure. In 2015, the United States had 305 underground coal mines and 529 surface mines operating.¹¹² Using EPA and EIA data results in estimates for the amount of greenhouse gas emissions from coal mine methane and post-mining processing per ton of coal mined of 0.02 tons of CO₂e per ton of coal mined for surface mines and approximately 0.16 tons of CO₂e per ton of coal mined for underground mines.^{113,114}

While methane is the largest greenhouse gas source from coal production, other mining operations add to the emission total. Diesel, which emits CO₂ when combusted, is a primary energy source for mining operations and is often used to move coal by trucks on-site. Electricity, most often dependent on the combustion of a fossil fuel, is also used to power mine operations. Coal production-associated emissions are small relative to emissions associated with combustion, averaging 2.7 percent of the lifecycle CO₂ emissions.¹¹⁵

Transportation of coal from the mine to the point of consumption, generally a power plant, is another significant source of greenhouse gas emissions. Coal is most frequently transported by rail, but river barges and trucks play a significant role as well. These modes of transportation rely on diesel fuel, which emits CO₂ when combusted. The greenhouse gas emissions associated with transportation are more significant for western coals, where more than 99 percent of Federal coal is located, as they have a greater distance to travel on average to reach their end use. In Wyoming, approximately 90 percent of the coal is shipped out of the state by rail. Transportation-associated emissions are small relative to emissions associated with combustion, averaging 1.7 percent of coal's lifecycle

¹¹¹ US EPA. 2016. Overview of US Greenhouse Gas Emissions. Available at <https://www.epa.gov/ghgemissions/overview-greenhouse-gases#methane>

¹¹² US EIA. 2016. Annual Coal Report. Table I. November 3, 2016. Available at <http://www.eia.gov/coal/annual/>

¹¹³ Based on emissions data at <https://www.epa.gov/sites/production/files/2016-04/documents/us-ghg-inventory-2016-main-text.pdf> at page 160

¹¹⁴ Coal production data from US EIA. 2016. Annual Coal Report. Table I. November 3, 2016. Available at <http://www.eia.gov/coal/annual/>

¹¹⁵ Foley, J. H. and P. Howard. 2016. Illuminating the Hidden Cost of Coal. New York University School of Law Institute of Policy Integrity. p. A-13. Available at http://policyintegrity.org/files/publications/Hidden_Costs_of_Coal.pdf

CO₂ emissions.¹¹⁶ However, when taking into account specific mine location and transportation distance and method, the share of greenhouse gas emission associated with transportation from a particular mine or basin may be higher.

5.6.2 Downstream Emissions

The most significant greenhouse gas impacts associated with coal occur at the point of combustion, estimated at 95.6 percent of coal's lifecycle CO₂e emissions.¹¹⁸ As stated, coal is the most CO₂ emissions-intensive fossil fuel, accounting for over 70 percent of CO₂ emissions from the power sector.

Coal's carbon intensity is significantly higher than natural gas's carbon intensity at the site of combustion. Taking into account the heat rate of coal plants versus that of natural gas combined-cycle plants, the average emission rate of a coal plant at 2,215 lbs of CO₂/MWh is more than double that of a gas-fired combined-cycle plant at 902 lbs of CO₂/MWh. Coal-fired electricity generation has been the most significant contributor to CO₂ emissions from the power sector, and that is projected to continue under the latest Annual Energy Outlook reference case scenarios. CO₂ content can vary significantly on a per ton basis for different coal types, such as subbituminous or bituminous. However, on an energy basis, CO₂ emission factors from coal are fairly consistent across coal types and geography, occupying a narrow range of 205 – 215 lbs CO₂ per mmBtu.¹¹⁷

In 2015, Federal coal accounted for 42 percent of total US coal production at 375 million tons with nearly all of this supplying the US electricity generation. Greenhouse gas emissions from coal-fired electricity generation have been decreasing due primarily to market drivers reducing coal-fired electricity consumption in recent years and are expected to reach new lows in 2016.

Future coal production will likely be influenced by these same market drivers as well as existing state, regional, and Federal policies that partially address some of the externalities associated with CO₂ emissions at the point of combustion. These include programs like California's Assembly Bill 32, the Northeast's Regional Greenhouse Gas Initiative, and the EPA's CPP. A small amount of Federal coal is also exported and combusted outside of the United States, but export markets are limited as is port capacity. As discussed in more detail in **Section 5.5.3**, exports are anticipated to remain a small portion of demand for US coal in future years.¹¹⁸

¹¹⁶ Spath, P. L., M. K. Mann, and D. R. Kerr. 1999. Life Cycle Assessment of Coal-fired Power Production. Report no. NREL/TP-570-25111. National Renewable Energy Lab. June 1999. Golden, Colorado. Available at <http://www.nrel.gov/docs/fy99osti/25119.pdf>

¹¹⁷ US EIA. 2016. Frequently Asked Questions. How much carbon dioxide is produced when different fuels are burned? June 14, 2016. Available at <https://www.eia.gov/tools/faqs/faq.cfm?id=73&t=11>

¹¹⁸ US EIA. 2016. 2016 Annual Energy Outlook. Table: Coal Supply, Disposition, and Prices. Available at http://www.eia.gov/forecasts/aeo/data/browser/#/?id=15-AEO2016®ion=00&cases=ref2016~ref_no_cpp&start=2013&end=2040&f=A&sourcekey=0

5.6.3 Quantifying Greenhouse Gas Emissions on Federal Lands

As part of Secretarial Order 3388, the Secretary instructed the Department of the Interior, through the USGS, to establish and maintain a public database to account for the annual carbon emissions from fossil fuels developed on Federal lands. Although not complete, this data source is under development and will be one potential database informing the Draft and Final PEIS.

The USGS is designing this database to report both emissions and sinks for CO₂, methane, and nitrous oxide resulting from the coal production on Federal lands by state. The database aims to combine ONRR, BLM, and BOEM data along with EPA emissions data to estimate total greenhouse gas emissions from fossil fuel extracted on Federal lands. It also aims to use USGS data to measure biological sequestration on Federal lands that serve as emissions sinks. By subtracting the sequestration estimates from the emission estimates, this tool can provide a net emissions value for Federal lands. An initial public release of the data is expected in mid-2017. This data will provide additional refinement and verification of coal lifecycle emission estimates.

5.7 SOCIOECONOMIC CONSIDERATIONS

The PEIS will evaluate a number of potential changes to the Federal coal program. Some of these potential changes could have impacts on the livelihoods and fiscal soundness of coal-dependent communities, particularly those near the Powder River Basin, due to the heavy concentration of leases and production from the Federal lands there. Appalachian coal communities could also be affected, as changes in the demand for predominantly western Federal coal in turn can affect the market for Appalachian coal. This section provides baseline socioeconomic information relevant to the PEIS.

5.7.1 Communities Dependent on Coal Extraction

Community Impacts

Viewed globally, the development potential of energy resources has been interpreted through two very different frameworks. The positive view holds that investment in mineral extraction literally unlocks buried treasure, leading to a “virtuous cycle of socioeconomic change.”¹¹⁹ A more skeptical view (the “resource curse”) suggests that the wealth generated by mineral extraction may not be shared locally and that an emphasis on resource extraction may deter development in other economic sectors. Recent research is clarifying the conditions that encourage local and regional economic gains from mining activity.¹²⁰

¹¹⁹ Bridge, G. 2004. “Contested Terrain: Mining and the Environment”. *Annual Review of Environment and Resources* 29, no. 1(2004): 225.

¹²⁰ Cust, J. and S. Poelhekke. 2015. “The Local Economic Impacts of Natural Resource Extraction”. *Annual Review of Resource Economics* 7(1): 251–68.

Since World War II, US coal mining employment has been in a long-term decline, falling from 533,000 jobs in 1948 to 78,000 in 2000.¹²¹ Technological change, resulting in rising productivity per worker, has been the primary driver of the decline.¹²² The downward trend was interrupted by a demand-driven employment boom in the 1970s (employment rose 74 percent in the period 1970 – 1980), followed by a bust in the 1980s.¹²³ The employment boom resulted not only from an increase in coal mining operations, but also from construction of a number of coal-fired generating plants (see **Figure 5-4**).

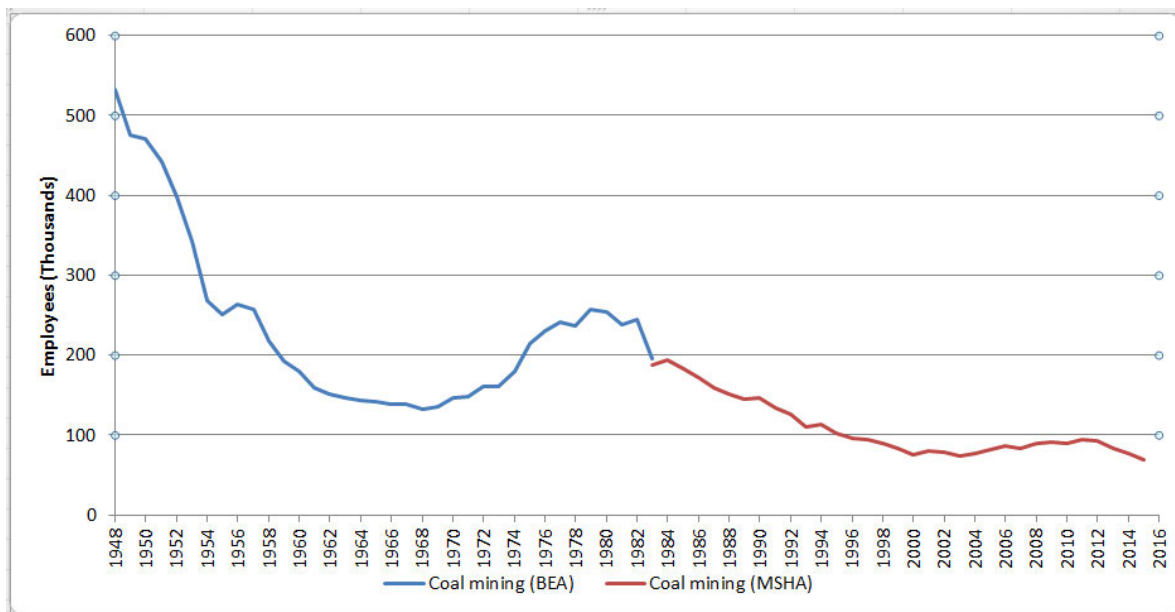


Figure 5-4. Coal Mining – Employment, 1948 – 2015

Sources:

Bureau of Economic Analysis 2016¹²⁴

MSHA 2016¹²⁵

Most studies of the community-level effects of US coal mining expansion come from this boom/bust cycle of the 1970s and 1980s. Many communities underwent rapid change. As a result of construction of the coal-fired Intermountain Power Project—with a proposed capacity of 3,000 megawatts—

¹²¹ Bureau of Economic Analysis. 2016. National Income and Products Accounts (NIPA) Tables 6.4A and 6.4C. Available at: <http://www.bea.gov/iTable/iTable.cfm?ReqID=9&step=1#reqid=9&step=3&isuri=1&903=192>.

¹²² Betz, M. R., M. Farren, and L. Lobao. 2015. “Coal Mining, Economic Development, and the Natural Resources Curse”. *Energy Economics* 50(107):105-116. Available at <https://mpira.ub.uni-muenchen.de/58016/>

¹²³ Ibid.

¹²⁴ Bureau of Economic Analysis. 2016. National Income and Products Accounts (NIPA) Tables 6.4A and 6.4C. Available at: <http://www.bea.gov/iTable/iTable.cfm?ReqID=9&step=1#reqid=9&step=3&isuri=1&903=192>.

¹²⁵ MSHA (United States Department of Labor Mine Safety Health Administration). 2016. Coal Mine and Employment Data. Accessed September 2016. Available at <http://arlweb.msha.gov/OpenGovernmentData/OGIMSHA.asp>.

the population of Delta, Utah rose from 1,930 people in 1980 to 6,670 in 1984 at the height of construction, and declined to 3,000 by 1990.¹²⁶

Many boomtowns experienced an acute shortage of infrastructure and services, particularly housing. Studies from the 1970s painted a negative picture of widespread social disruption, sometimes termed the “Gillette Syndrome.” Effects included “dramatic increases in divorce, depression[,] . . . criminal activity, mental disorders, and other social problems.”¹²⁷ Later research suggested a more complex picture, recognizing recovery and adaptation to changing circumstances, in addition to tempering the overly negative characterization of social change under rapid energy development.¹²⁸

As shown in **Figure 5-5**, there are major regional differences in the trends of both coal employment and production. Nationwide coal industry employment fell some 50 percent between 1987 and 2014 while nationwide production rose slightly. The dramatic change is in western coal production. Western production doubled between 1987 and 2008, but then began to decline. It is the far lower labor intensity of western coal operations, dominated by the Powder River Basin, over eastern coal that made it possible for production to increase while national employment fell dramatically (see **Section 5.4.5** for more information).¹²⁹ Today the western coal industry, faced with declining employment, is following the trend seen earlier in Appalachia and other eastern coal regions.¹³⁰

Many of the social effects of abruptly lower coal production noted from the bust of the 1980s are evident today as part of a longer-term decline in coal employment and production. Simple models of the economy assume labor mobility; as jobs disappear in one region or sector, workers relocate to more favorable labor markets. For a variety of reasons, the reality is far more complex; many factors work to keep people in place, even after mines have cut back production or closed. In coal country, as in many other rural areas centered on resource extraction, communities reflect a distinctive way of life that involves social ties and cultural values as much as economic activities. The

¹²⁶ Brown, R. B., S. F. Dorins, and R. S. Krannich. 2005. “The Boom-bust-recovery Cycle: Dynamics of Change in Community Satisfaction and Social Integration in Delta, Utah”. *Rural Sociology* 70 (1):31. Available at <http://www.sublettewyo.com/ArchiveCenter/ViewFile/Item/71>

¹²⁷ Smith, M. D., R. S. Krannich, and L. M. Hunter, “Growth, Decline, Stability, and Disruption: A Longitudinal Analysis of Social Well-Being in Four Western Rural Communities”. *Rural Sociology* 66(3):427.

¹²⁸ Brown, R. B., S. F. Dorins, and R. S. Krannich. 2005. “The Boom-bust-recovery Cycle: Dynamics of Change in Community Satisfaction and Social Integration in Delta, Utah”. *Rural Sociology* 70(1):31. Available at <http://www.sublettewyo.com/ArchiveCenter/ViewFile/Item/71>

¹²⁹ US EIA. 2016. Coal data browser. Coal produced per labor hour. Available at <http://www.eia.gov/coal/annual/pdf/table21.pdf>.

¹³⁰ For example, coal production in the western United States was 6.5 percent lower in 2015 relative to 2014. See US EIA. 2015. 2015 Annual Coal Report. Available at <http://www.eia.gov/coal/annual/>.

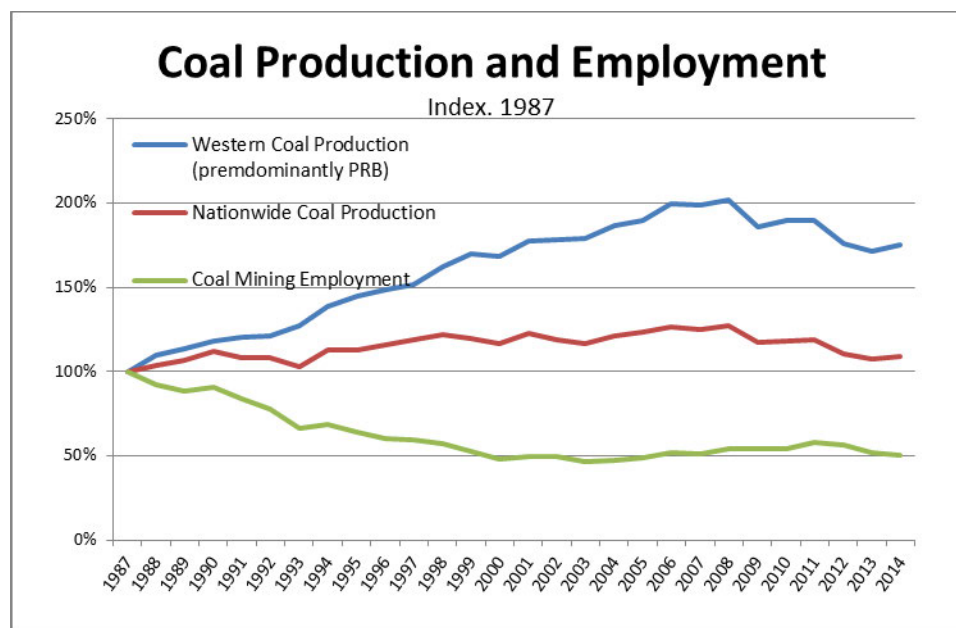


Figure 5-5. Coal Employment and Production, 1987 – 2015

Sources:

Employment: MSHA 2016¹³¹

Production (1987-2011): US EIA 2012¹³²

Production (2012-2015): US EIA 2016¹³³

way of life in coal communities is based on ties of employment and friendship, ties of family across multiple generations, and ties to place. As one author wrote of the anthracite mining towns of northeastern Pennsylvania:

“The people remaining in these towns – half or one-third the 1920 number – have a powerful sense of belonging just where they are.”¹³⁴

Renewable energy and natural gas are rapidly gaining ground relative to coal as the sources for generating electricity. But there is no assurance that this shift can provide a lifeline to struggling coal-dependent communities or workers who are unwilling to relocate. Notwithstanding these challenges, commitment to place and community can be a very positive force in finding a path to a more resilient and diversified local economy. There are numerous case studies of formerly coal-reliant Appalachian communities that have used economic

¹³¹MSHA (United States Department of Labor Mine Safety Health Administration). 2016. Coal Mine and Employment Data. Accessed September 2016. Available at <http://arlweb.msha.gov/OpenGovernmentData/OGIMSHA.asp>.

¹³² US EIA. 2012. Annual Energy Review, Table 7.2: Coal Production, 1949-2011. Available at: <https://www.eia.gov/totalenergy/data/annual/showtext.php?t=ptb0702>

¹³³ US EIA. 2016. Annual Coal Report, Table 1. Coal Production and Number of Mines by State and Mine Type. Available at: <http://www.eia.gov/coal/annual/>

¹³⁴ Marsh, B. 1987. “Continuity and Decline in the Anthracite Towns of Pennsylvania”. *Annals of the Association of American Geographers* 77(3):337. Available at http://www.facstaff.bucknell.edu/marsh/anthracite_towns.pdf

development strategies that invest in local and regional assets—such as human capital, infrastructure, entrepreneurs, and emerging industry clusters—to successfully diversify their economies.¹³⁵

Demographic and Employment Data for Areas Supplying Coal

As described above, coal production occurs in three broad regions: Appalachian, Interior, and Western. Because the vast majority of coal from Federal lands is produced in the western region, this section divides the western region into 13 subregions, based on the coal supply regions used in the EPA Base Case v5.13.¹³⁶

Table 5-3, below, describes the 15 regions and subregions, and includes both Federal and non-Federal coal resources. A map is shown in **Figure 5-6**.

Table 5-3
Coal Supply Regions

Region	Subregion	Description	Number of Counties
Appalachian	None	Includes portions of Pennsylvania, West Virginia, Ohio, Maryland, Virginia, Eastern Kentucky, Tennessee, and Alabama	193
Interior	None	Includes portions of Indiana, Illinois, Western Kentucky, Missouri, Kansas, Oklahoma, Texas, Arkansas, and Louisiana	206
Western	CG	Colorado, Green River	44
	CR	Colorado, Raton	1
	CU	Colorado, Uinta	5
	UT	Utah	8
	ME	Montana, East	1
	ND	North Dakota	22
	MP	Montana, Powder River	3
	MT	Montana, Bull Mountain	14
	AZ	Arizona	1
	NS	New Mexico	2
	WG	Western Wyoming	4
	WH	Wyoming Northern Powder River Basin	1
	WL	Wyoming Southern Powder River Basin	3

¹³⁵ Center for Regional Economic Competitiveness, 2014. Economic Diversity in Appalachia. Statistics, Strategies, and Guides for Action. Prepared for Appalachian Regional Commission. February 2014. Available at https://www.arc.gov/assets/research_reports/EconomicDiversityinAppalachiaCompilationofAllReports.pdf

¹³⁶ The EPA maintains an application of the IPM to analyze the impact of power sector regulations. IPM is a linear programming, least-cost optimization model of the US power sector developed by ICF consulting. It provides forecasts of least-cost capacity expansion and electricity dispatch to meet energy demand subject to market and regulatory factors. It captures a wide range of issues related to the power sector, including fuel markets such as coal. The model is widely used by government and industry to assess policy and market influences. See US EPA. 2013. Documentation for EPA Base Case v.5.13 Using the Integrated Planning Model. EPA #450R13002. Available at https://www.epa.gov/sites/production/files/2015-07/documents/documentation_for_epa_base_case_v.5.13_using_the_integrated_planning_model.pdf

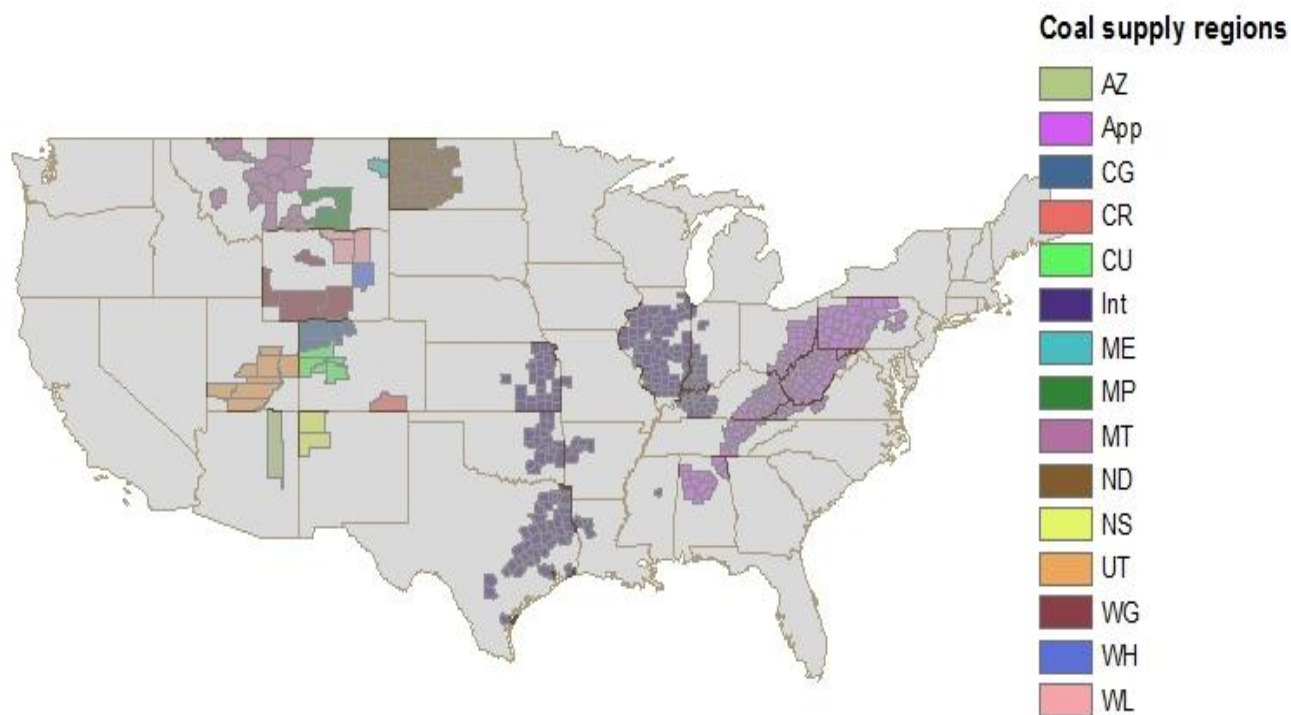


Figure 5-6. Coal Supply Regions

Table 5-4 presents population, wage, and income information for the 15 coal supply regions and the United States. As the data show, these parameters vary widely across regions. Employment growth between 1970 and 2014 ranged from half of the national rate (e.g., in the Appalachian, Rocky Mountain CR, and Western Montana MT regions) to over three times the national rate (e.g., Rocky Mountain CU region). Personal income growth showed similar trends. With a few exceptions, average annual wages were at or below the national average in 2015. However, with the exception of the Rocky Mountain CU region, the average annual wages for mining (except oil and gas), for regions reporting this variable, substantially exceeded the national and regional average wages.

Table 5-4
Sociodemographic Characteristics of Coal Supply Regions

	App.	Int.	CG	CR	CU	UT	ME	ND	MP	MT	AZ	NS	WG	WH	WL	Total US
Population 2014 (thous.) ¹	11,851	22,017	45	14	269	124	12	325	27	191	108	198	84	14	87	318,857
Pop. Change 1970 - 2014 (%) ¹	5.2	35.7	125.1	-11.2	172.3	116.8	17.8	33.5	37.1	8.4	124.1	105.5	83.9	132.2	138.0	56.5
Employment Change 1970 - 2014 (%) ¹	43.4	75.8	286.2	48.8	316.6	198.1	114.0	165.1	72.5	41.7	251.5	205.5	138.5	246.8	252.5	103.6
Personal Income Change 1970- 2014 (%) ¹	97.0	142.2	421.3	114.6	458.9	256.5	220.7	311.5	125.8	72.4	339.4	311.7	279.1	411.5	378.1	181.7
Avg. annual wages, all sectors 2015 (\$) ²	44,119	54,410	44,814	36,858	42,710	33,935	53,989	58,176	44,193	36,814	37,576	41,229	52,833	51,482	50,438	52,937
Avg. annual wages, mining (except oil & gas), 2015 (\$) ²	76,564	79,780	82,172	N/A	48,151	74,122	86,435	84,652	N/A	N/A	N/A	N/A	100,587	N/A	85,693	74,695
Coal wages/all wages (%)	173.5	146.6	183.4	N/A	112.7	218.4	160.1	145.5	N/A	N/A	N/A	N/A	190.4	N/A	169.9	141.1
Receiving transfer payments (2014) (%) ³	24.5	16.4	10.7	32.4	15.3	23.2	8.4	9.9	26.1	20.5	40.3	25.3	11.9	13.3	11.6	17.2

N/A: information not disclosed for the region

Information represents the most recent data available from the following sources:

1. Bureau of Economic Analysis 2015¹³⁷
2. Bureau of Labor Statistics 2016¹³⁸
3. Bureau of Economic Analysis 2015¹³⁹

¹³⁷ Bureau of Economic Analysis, Regional Economic Accounts 2015; from Economic Profile System (EPS) Summary Profile, p. 2. Headwater Economics EPS tool available at: <https://headwaterseconomics.org/tools/economic-profile-system/about/>

¹³⁸ Bureau of Labor Statistics, Quarterly Census of Employment and Wages, 2016; from EPS Mining Profile. p. 5. Headwater Economics EPS tool available at: <https://headwaterseconomics.org/tools/economic-profile-system/about/>

¹³⁹ Bureau of Economic Analysis, Regional Economic Accounts, 2015; from EPS, Non-Labor Income Report. p. 1. Headwater Economics EPS tool available at: <https://headwaterseconomics.org/tools/economic-profile-system/about/>

Table 5-5 presents coal mine employment in 2014 and 2015 and total employment in 2014 for each region. The Appalachian and Interior regions accounted for about 80 percent of the total coal employment across all the regions. The proportion of employment associated with coal varies across regions and was highest in the Montana MP and Wyoming WL regions. While these data provide a useful overview of where coal employment exists, the role of coal employment may be more significant at local levels. The subsequent section explores this point.

Figure 5-7 displays coal mine employment trends between 2000 and 2015 for the three broad supply regions. This figure demonstrates that the larger downward trend in employment beginning around 2011 has been driven primarily by coal employment reductions in the Appalachian region.

Table 5-5
Coal Mine Employment by Supply Region

	Coal Mine Employment, 2015 ¹	Coal Mine Employment, 2014 ¹	Total Employment, 2014 ²	Percent Coal Employment, 2014
Appalachian	39,471	46,891	6,235,437	0.8
Interior	14,636	16,073	13,167,982	0.1
CG	909	926	35,347	2.6
CR	15	24	7,764	0.3
CU	575	724	175,592	0.4
UT	1,308	1,413	70,377	2.0
ME	12	12	9,864	0.1
ND	1,313	1,292	285,040	0.5
MP	1,317	1,306	14,255	9.2
MT	0	0	109,350	0.0
AZ	403	387	40,585	1.0
NM	1,133	1,175	93,120	1.3
WG	1,026	1,021	53,626	1.9
WH	611	569	9,583	5.9
WL	5,016	5,039	60,366	8.3

Information represents the most recent data available from the following sources:

1. MSHA. 2016¹⁴⁰.

2. Bureau of Economic Analysis. 2015¹⁴¹

¹⁴⁰ MSHA (United States Department of Labor Mine Safety Health Administration). 2016. Coal Mine and Employment Data. Accessed September 2016. Available at <http://arlweb.msha.gov/OpenGovernmentData/OGIMSHA.asp>.

¹⁴¹ Bureau of Economic Analysis. 2015. A25N: Total Full-Time and Part-Time Employment by NAICS Industry. Available at <https://www.bea.gov/itable/index.cfm>

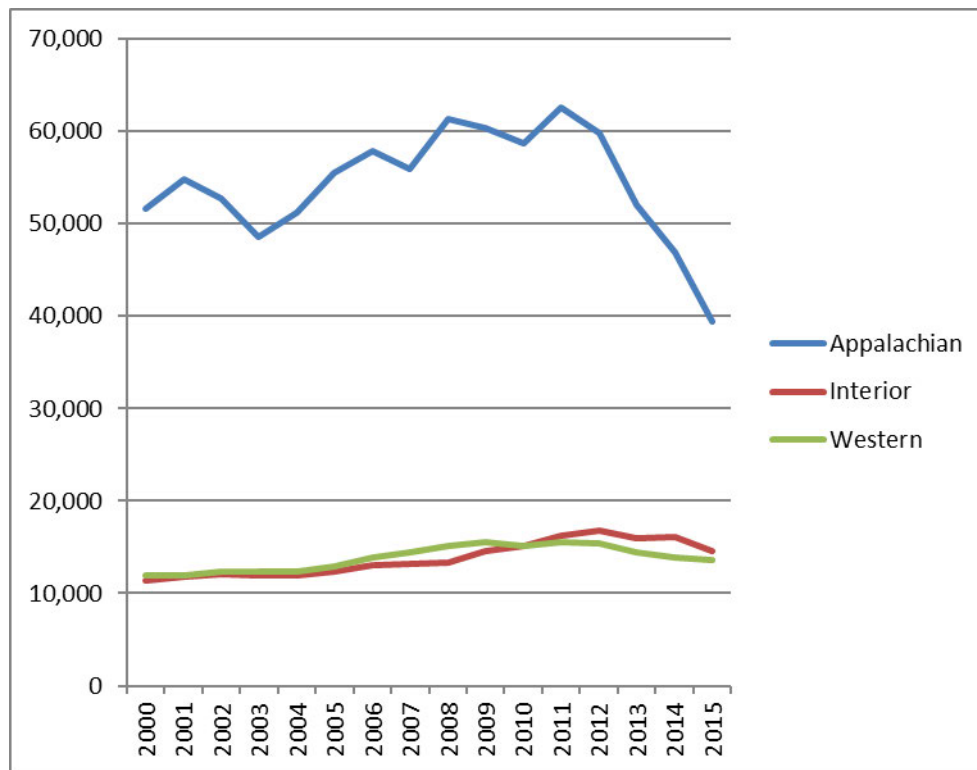


Figure 5-7. Coal Mine Employment, 2000 – 2015 by Supply Region

Source: MSHA 2016¹⁴²

County-level Socioeconomic Variability

The previous section provides an aggregate view of broad coal-producing regions. Assessing the likely effects on counties and communities from changes to coal leasing policy requires some recognition of their economic and demographic variability. A contrast of three coal-producing counties reveals some of the relevant variation (see **Table 5-6**). These counties include:

- Boone County, WV. With some of the highest production in West Virginia, this county exemplifies the coal conditions of Appalachia, dominated by private mineral holdings.¹⁴³
- Campbell County, WY. In the Powder River Basin, this county has the highest coal production in Wyoming.¹⁴⁴

¹⁴² MSHA (United States Department of Labor Mine Safety Health Administration). 2016. Coal Mine and Employment Data. Accessed September 2016. Available at <http://arlweb.msha.gov/OpenGovernmentData/OGIMSHA.asp>.

¹⁴³ US EIA. 2014. Annual Coal Report 2014, Table 2. Coal Production and Number of Mines by State, County, and Mine Type, 2014. November 3, 2016. Available at <http://www.eia.gov/coal/annual/pdf/table2.pdf>

¹⁴⁴ US EIA. 2014. Annual Coal Report 2014, Table 2. Coal Production and Number of Mines by State, County, and Mine Type, 2014. November 3, 2016. Available at <http://www.eia.gov/coal/annual/pdf/table2.pdf>

**Table 5-6
County Comparison Table**

	Boone Co., WV	Campbell Co., WY	Delta Co., CO
Population change, 1970 – 2014 ¹	-5.8%	270.3%	95.3%
Employment change, 1970 – 2014 ¹	34.5%	459.9%	155.5%
Personal income change, 1970 – 2014 ¹	59.1%	739.9%	244.8%
Coal / total employment 2014 ²	29.2%	14.9%	2.4%
Ratio 2016 / 2000 coal employment (2000 = 100%) ²	34.8%	136.2%	47.6%
Average annual wages, all sectors, 2015 ³	\$45,905	\$57,426	\$33,178
Average annual wages, mining (except oil & gas), 2015 ³	\$79,239	\$85,936	\$73,181 ⁴
Coal wages / all wages	173%	150%	221%
Bachelor degree or higher, 2010-2014 ⁵	9.1%	19.2%	18.9%
Receiving transfer payments (2014) ⁶	34.1%	9.0%	25.4%

Information represents the most recent data available from the below sources

1. Bureau of Economic Analysis 2015¹⁴⁵

2. Bureau of Economic Analysis 2014¹⁴⁶

3. Bureau of Labor Statistics 2016¹⁴⁷

4. For Delta County, data for mining wages (except oil and gas) is not available; overall mining wages are shown.

5. Census Bureau¹⁴⁸

6. Bureau of Economic Analysis. 2015¹⁴⁹

- Delta County, CO. On the Gunnison River's North Fork, this county has a relatively more diverse economic base, but coal jobs remain important.

Since 2000, the level of coal sector employment in the three counties has diverged (see **Figure 5-8**). In 2015, Campbell County coal employment was 157 percent of the employment of 2000. Delta County, after doubling the 2000 employment level in 2013, by 2015 had declined to 104 percent of its 2000 level, while in Boone County's coal sector employment stood at 66 percent of its earlier level. While the statistics are abstractions, local examples better convey the extent of the decline. From a 2016 news story in Delta County, Colorado:

¹⁴⁵ Bureau of Economic Analysis. 2015. Regional Economic Accounts 2015. From Economic Profile System (EPS) Summary Profile, p. 2. Headwater Economics EPS tool available at:

<https://headwaterseconomics.org/tools/economic-profile-system/about/>

¹⁴⁶ Bureau of Economic Analysis. 2014. GDP & Personal Income Regional Data, 1970-2014.

<http://www.bea.gov/itable/iTable.cfm?ReqID=70&step=1#reqid=70&step=27&isuri=1&7022=49&7023=7&7024=n-industry&7025=4&7026=08029&7001=749&7028=-1&7083=levels&7029=49&7090=70&7031=08000>. United States Department of Labor, Employment/Production Data Set (Yearly).

¹⁴⁷ Bureau of Labor Statistics. 2016. Quarterly Census of Employment and Wages. From EPS Mining Profile, p. 5. Headwater Economics EPS tool available at: <https://headwaterseconomics.org/tools/economic-profile-system/about/>

¹⁴⁸ Census Bureau. 2016. Quick Facts. Available at

<http://www.census.gov/quickfacts/table/PST045215/08029,56005,54005,00>

¹⁴⁹ Bureau of Economic Analysis. 2015, Regional Economic Accounts. From EPS Non-Labor Income Report, p. 1.

Headwater Economics EPS tool available at: <https://headwaterseconomics.org/tools/economic-profile-system/about/>

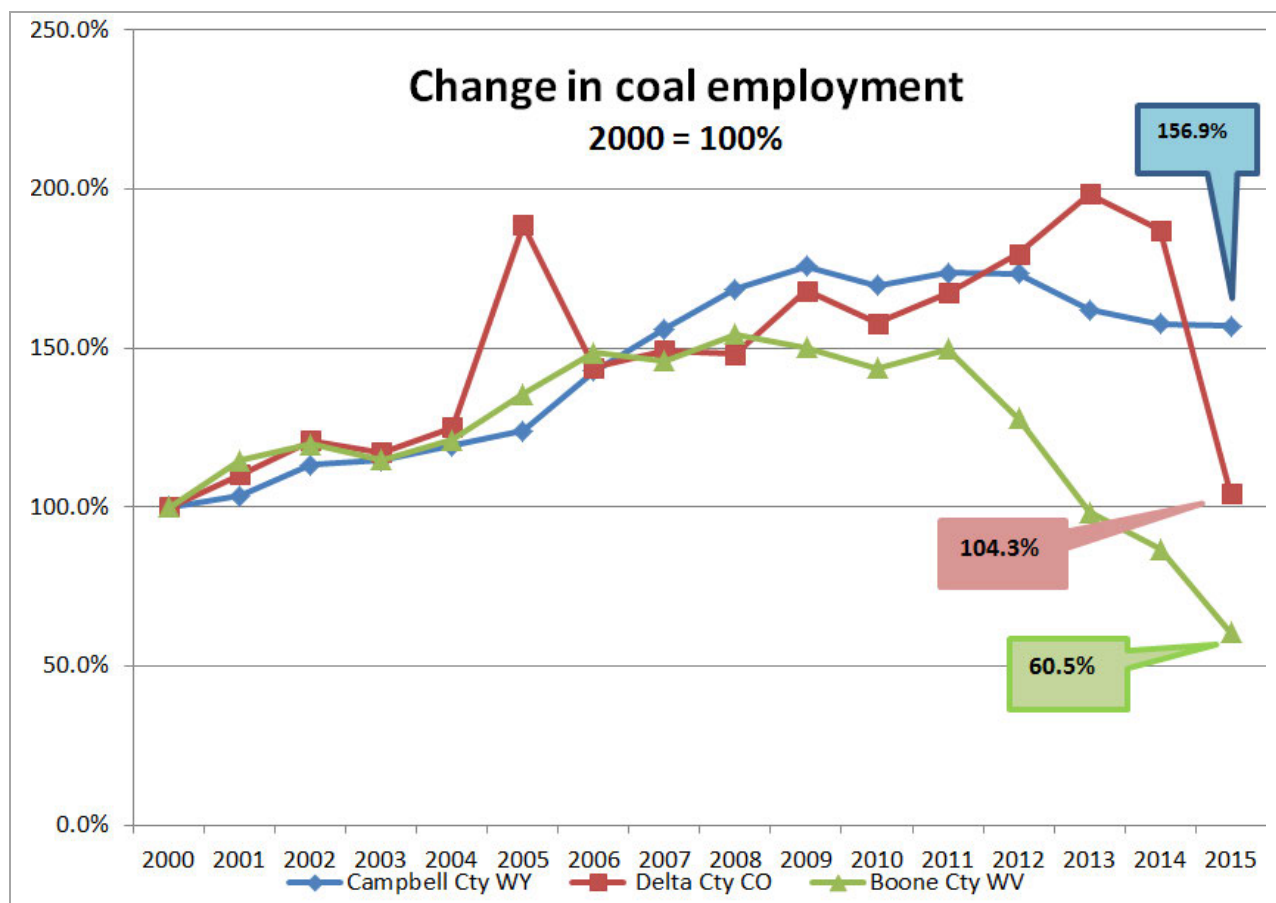


Figure 5-8. Change in Coal Employment

Sources:

MSHA. 2016¹⁵⁰

Bureau of Economic Analysis. 2014¹⁵¹

“Bowie Resource Partners said Friday that depressed coal prices have forced it to idle the Bowie #2 Mine near Paonia in the latest mine closure to hit Colorado’s Western Slope. BRP, through its subsidiary Bowie Resources LLC, employed 108 full-time workers and one contractor at the facility. The closure is another big economic blow to Delta County, whose coal industry employment has dropped from 1,200 positions to less than 400 since 2013. That doesn’t include the hundreds of support jobs in fields like construction and logging that helped keep the county’s mines running. ‘The coal mines are very

¹⁵⁰ MSHA (United States Department of Labor Mine Safety Health Administration). 2016. Employment/Production Data Set (Yearly). Available at <http://arlweb.msha.gov/OpenGovernmentData/OGIMSHA.asp>.

¹⁵¹ Bureau of Economic Analysis. 2014. GDP & Personal Income Regional Data, 1970-2014. Available at <http://www.bea.gov/itable/iTable.cfm?ReqID=70&step=1#reqid=70&step=27&isuri=1&7022=49&7023=7&7024=no-n-industry&7025=4&7026=08029&7001=749&7028=-1&7083=levels&7029=49&7090=70&7031=08000>.

critical to the economy of Delta County. We have lost two-thirds of those jobs in the last three years,' said Robbie LeValley, Delta County administrator."¹⁵²

The loss of coal jobs can have an outsized effect on communities, because the coal industry pays far higher than average wages. In the three counties, average coal wages were between 150 percent and 221 percent of average wages in all sectors. The proportion of jobs provided by mining, in contrast, varies greatly across the three counties, ranging from nearly 30 percent in Boone County in 2014 to less than 3 percent in Delta County.

Industries Related to Coal Production

Beyond the local economic activity directly supported by coal operations (e.g., employment at coal operations), additional economic activity, including secondary or multiplier effects and upstream effects (e.g., economic activity associated with the sale of coal such as rail transportation and electricity generation), can be linked to coal operations. Multiplier effects arise from the fact that local businesses, households, and governmental agencies purchase goods and services from one another. These effects include indirect impacts (economic activity affected by sectors that supply inputs to coal operations) and induced impacts (economic activity affected by income expenditures, such as expenditures on groceries or housing of employees in both the coal sector and supplying sectors).¹⁵³

The magnitude of multiplier and upstream economic effects varies by region. A February 2015 study by the University of Wyoming's Center for Energy Economics and Public Policy estimated these additional economic effects for Wyoming.¹⁵⁴ The study found that, in 2012, for every coal mining operation job in Wyoming, an additional 1.32 jobs were supported in Wyoming as a result of indirect and induced economic effects. Rail and electric generation associated with coal supported an additional 7,105 jobs in Wyoming (including indirect and induced economic effects). This upstream employment represented approximate 30 percent of the "total coal economy" in Wyoming.

The Utah Governor's Office of Energy Development commissioned a similar analysis focused on multiplier effects and found that for every coal mining operation job in Utah, an additional 1.21 jobs were supported in Utah as a result

¹⁵² Svaldi, A. 2016. "Delta County Loses Another Big Coal Mine with Closure of Bowie #2". *The Denver Post*. February 26, 2016. Available at: <http://www.denverpost.com/2016/02/26/delta-county-loses-another-big-coal-mine-with-closure-of-bowie-2/>

¹⁵³ Leontief, W. W. 1986. *Input-Output Economics*. 2nd ed., New York: Oxford University Press.

¹⁵⁴ Godby, R., R. Coupal, D. Taylor, and T. Considine. 2015. *The Impact of the Coal Economy on Wyoming*. University of Wyoming, Center for Energy Economics and Public Policy. Prepared for the Wyoming Infrastructure Authority. February 2015. Available at: http://www.uwyo.edu/cee/_files/docs/wia_coal_full-report.pdf

of indirect and induced economic effects.¹⁵⁵ An economic study of coal in Colorado concluded that, in 2012, about 1.44 indirect and induced jobs were supported for every coal sector job in Colorado as a whole, and 1.04 indirect and induced jobs in northwest Colorado for every northwest Colorado coal mining job.¹⁵⁶

5.7.2 Externalities Associated with Coal

An externality is defined as a side effect or consequence of an industrial or commercial activity that affects other parties without this being reflected in the cost of the goods or services. There are a number of externalities cited in conjunction with coal production, transportation, and consumption.^{157,158,159} Environmental, social, and economic values that can be particularly vulnerable near coal-fired power plants or along coal transportation networks include those related to air quality, water quality, noise, and wildlife populations. Ecosystem services associated with these values provide many market and nonmarket benefits. While the costs of these externalities may not be fully reflected in the fiscal terms of Federal coal leases, it is important to note that there are a number of Federal, state, and local laws and regulations that control such impacts.

Coal mining can produce several production-related externalities, including the emission of greenhouse gases; air and water pollution, including associated negative health effects; and water use. Methane, a potent greenhouse gas, is released when gases trapped in coal seams are released when they are cut to extract coal. Running equipment (drills, bulldozers, and trucks) causes additional types of air pollution, in addition to greenhouse gas emissions, particularly criteria pollutants (i.e., carbon monoxide, lead, ground-level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide). Coal mining can affect water quality and, thus, human health, livestock, fishing stocks, and aquatic species. In addition, coal mining can use a significant amount of water for dust

¹⁵⁵ Utah Governor's Office of Energy Development. 2015. Energy and Energy-related Mining in Utah, An Economic and Fiscal Assessment. May 2015. Available at [Energy and Energy-related Mining in Utah, An Economic and Fiscal Assessment](#).

¹⁵⁶ Hovarth, G. 2014. Measurement of Economic Activity for Coal Industry and Electrical Power Generation Industry in the Yampa-White River Region of Northwest Colorado. Funding provided by the Economic Development Council of Colorado. Prepared for the Craig/Moffat Economic Development Partnership, Rio Blanco County, and Steamboat Springs Economic Development Council. Available at <http://cber.co/wp-content/uploads/2014/05/Economic-Impact-of-Coal-Industry-in-the-Yampa-White-River-Region-of-Colorado.pdf>

¹⁵⁷ For review of externalities associated with coal production, see Hein, J. F., and P. Howard. 2015. "Illuminating the Hidden Costs of Coal: How the Interior Department Can Use Economic Tools to Modernize the Federal Coal Program". Institute for Policy Integrity. New York University School of Law. December 2015. Available at http://policyintegrity.org/files/publications/Hidden_Costs_of_Coal.pdf

¹⁵⁸ Epstein, P. R. et al. 2011. "Full cost accounting for the life cycle of coal". *Ann. N.Y. Acad. Sci.* 1219(2011):73-98. Available at http://www.chgeharvard.org/sites/default/files/epstein_full%20cost%20of%20coal.pdf

¹⁵⁹ Lashof, D. 2007. Coal in a Changing Climate. Natural Resources Defense Council (NRDC). NRDC Issue Paper. February 2007. Available at <https://www.nrdc.org/sites/default/files/coalclimate.pdf>

control, extraction (i.e., to cool equipment and prevent fire), and processing (e.g., coal washing).

The transportation of coal requires large amounts of energy and includes some risks. According to a study by the Institute for Policy Integrity at New York University, in the United States, coal companies transport 70 percent of their product by rail, approximately 10 percent by truck, 10 percent or more by waterways, and the rest using a variety of means including conveyor belts and slurry pipelines.¹⁶⁰ Transportation of coal can result in multiple externalities, including increased risk to public health through accidents and air pollution, emission of greenhouse gases, and noise.

The combustion of coal can contribute to air quality externalities, as the burning of coal results in emissions of nitrogen oxides, sulfur dioxide, the particulates PM₁₀ and PM_{2.5}, and mercury, all of which can affect air quality and public health.¹⁶¹ Importantly, the greenhouse gas emissions associated with coal consumption contribute to global climate change.¹⁶² According to the National Research Council, “Emissions of CO₂ from the burning of fossil fuels have ushered in a new epoch where human activities will largely determine the evolution of Earth’s climate. Because CO₂ in the atmosphere is long lived, it can effectively lock Earth and future generations into a range of impacts, some of which could become very severe. Therefore, emission reduction choices made today matter in determining impacts experienced not just over the next few decades, but in the coming centuries and millennia.”¹⁶³

In 2009, based on a large body of robust and compelling scientific evidence, the EPA Administrator issued the Endangerment Finding under CAA section 202(a)(1).¹⁶⁴ In the Endangerment Finding, the Administrator found that the current, elevated concentrations of greenhouse gases in the atmosphere—already at levels unprecedented in human history—may reasonably be anticipated to endanger public health and welfare of current and future generations in the United States. We summarize these adverse effects on public health and welfare briefly here.

¹⁶⁰ Hein, J. F., and P. Howard. 2015. “Illuminating the Hidden Costs of Coal: How the Interior Department Can Use Economic Tools to Modernize the Federal Coal Program”. Institute for Policy Integrity. New York University School of Law. December 2015. Available at http://policyintegrity.org/files/publications/Hidden_Costs_of_Coal.pdf

¹⁶¹ Lashof, D. 2007. Coal in a Changing Climate. Natural Resources Defense Council (NRDC). NRDC Issue Paper. February 2007. Available at <https://www.nrdc.org/sites/default/files/coalclimate.pdf>

¹⁶² US EPA. 2016. Climate Change: Basic Information. Available at <https://www.epa.gov/climatechange/climate-change-basic-information>

¹⁶³ National Research Council. 2011. Climate Stabilization Targets. Missions, Concentrations, and Impacts over Decades to Millennia. p. 3. Available at <https://www.nap.edu/catalog/12877/climate-stabilization-targets-emissions-concentrations-and-impacts-over-decades-to>

¹⁶⁴ US EPA. 2009. Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act. Final Rule. 74 FR 66496. December 15, 2009. Available at <https://www.gpo.gov/fdsys/pkg/FR-2009-12-15/pdf/E9-29537.pdf>

Public Health Impacts

Climate change caused by human emissions of greenhouse gases threatens the health of Americans in multiple ways. By raising average temperatures, climate change increases the likelihood of heat waves, which are associated with increased deaths and illnesses. While climate change also increases the likelihood of reductions in cold-related mortality, evidence indicates that the increases in heat mortality will be larger than the decreases in cold mortality in the United States. Compared with a future without climate change, climate change is expected to increase ozone pollution over broad areas of the United States, especially on the highest ozone days and in the largest metropolitan areas with the worst ozone problems, and thereby increase the risk of morbidity and mortality. Climate change is also expected to cause more intense hurricanes and more frequent and intense storms and heavy precipitation, with impacts on other areas of public health, such as the potential for increased deaths, injuries, infectious and waterborne diseases, and stress-related disorders. Children, the elderly, and the poor are among the most vulnerable to these climate-related health effects.

Public Welfare Impacts

Climate change impacts touch nearly every aspect of public welfare. Among the multiple threats caused by human emissions of greenhouse gases, climate changes are expected to place large areas of the country at serious risk of reduced water supplies, increased water pollution, and increased occurrence of extreme events such as floods and droughts. Coastal areas are expected to face a multitude of increased risks, particularly from rising sea level and increases in the severity of storms. These communities face storm and flooding damage to property, or even loss of land due to inundation, erosion, wetland submergence, and habitat loss.

Impacts of climate change on public welfare also include threats to social and ecosystem services. Climate change is expected to result in an increase in peak electricity demand. Extreme weather from climate change threatens energy, transportation, and water resource infrastructure. Climate change may also exacerbate ongoing environmental pressures in certain settlements, particularly in Alaskan indigenous communities, and is very likely to fundamentally rearrange US ecosystems over the 21st century. Though some benefits may balance adverse effects on agriculture and forestry in the next few decades, the body of evidence points toward increasing risks of net adverse impacts on US food production, agriculture, and forest productivity as temperature continues to rise. These impacts are global and may exacerbate problems outside the United States that raise humanitarian, trade, and national security issues for the United States.

New Scientific Assessments and Observations

Since the administrative record concerning the Endangerment Finding closed following the EPA's 2010 Reconsideration Denial, climate change impacts have

continued to intensify, with new records being set for a number of climate indicators, such as global average surface temperatures, Arctic sea ice retreat, CO₂ concentrations, and sea level rise. Additionally, a number of major scientific assessments have been released that further improve understanding of the climate system and further strengthen the case that greenhouse gases endanger public health and welfare both for current and future generations. These assessments from the Intergovernmental Panel on Climate Change (IPCC), the US Global Change Research Program, and the National Research Council (NRC) include:

- IPCC's 2012 Special Report on Managing the Risks of Extreme Events and Disasters to Advance Climate Change Adaptation and the 2013–2014 Fifth Assessment Report (AR5)
- The US Global Change Research Program 2014 National Climate Assessment, *Climate Change Impacts in the United States* (NCA3)
- The NRC's 2010 *Ocean Acidification: A National Strategy to Meet the Challenges of a Changing Ocean* (Ocean Acidification); 2011 *Report on Climate Stabilization Targets: Emissions, Concentrations, and Impacts over Decades to Millennia* (Climate Stabilization Targets); 2011 *National Security Implications for US Naval Forces* (National Security Implications); 2011 *Understanding Earth's Deep Past: Lessons for Our Climate Future* (Understanding Earth's Deep Past); 2012 *Sea Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future*; 2012 *Climate and Social Stress: Implications for Security Analysis* (Climate and Social Stress); and 2013 *Abrupt Impacts of Climate Change* (Abrupt Impacts) assessments.

The findings of the recent scientific assessments confirm and further strengthen the conclusion that greenhouse gases endanger public health, now and in the future. The NCA3 indicates that human health in the United States will be impacted by “increased extreme weather events, wildfire, decreased air quality, threats to mental health, and illnesses transmitted by food, water, and disease-carriers such as mosquitoes and ticks.” The most recent assessments now have greater confidence that climate change will influence production of pollen that exacerbates asthma and other allergic respiratory diseases such as allergic rhinitis, as well as effects on conjunctivitis and dermatitis. Both the NCA3 and the IPCC AR5 found that increasing temperature has lengthened the allergenic pollen season for ragweed, and that increased CO₂ by itself can elevate production of plant-based allergens.

The NCA3 also concludes that children's unique physiology and developing bodies contribute to making them particularly vulnerable to climate change. Impacts on children are expected from heat waves, air pollution, infectious and waterborne illnesses, and mental health effects resulting from extreme weather events. The IPCC AR5 indicates that children are among those especially

susceptible to most allergic diseases, as well as health effects associated with heat waves, storms, and floods. The IPCC finds that additional health concerns may arise in low-income households, especially those with children, if climate change reduces food availability and increases prices, leading to food insecurity within households.

Both the NCA3 and IPCC AR5 conclude that climate change will increase health risks facing the elderly. Older people are at much higher risk of mortality during extreme heat events. Pre-existing health conditions also make older adults susceptible to cardiac and respiratory impacts of air pollution and to more severe consequences from infectious and waterborne diseases. Limited mobility among older adults can also increase health risks associated with extreme weather and floods.

The new assessments also confirm and further strengthen the conclusion that greenhouse gases endanger public welfare, and emphasize the urgency of reducing greenhouse gas emissions due to their projections that show greenhouse gas concentrations climbing to ever-increasing levels in the absence of mitigation. The NRC assessment *Understanding Earth's Deep Past* projected that, without a reduction in emissions, CO₂ concentrations by the end of the century would increase to levels that the Earth has not experienced for more than 30 million years.¹⁶⁵ In fact, that assessment stated that “the magnitude and rate of the present greenhouse gas increase place the climate system in what could be one of the most severe increases in radiative forcing of the global climate system in Earth history.”¹⁶⁶ Because of these unprecedented changes, several assessments state that we may be approaching critical, poorly understood thresholds. As stated in the assessment, “As Earth continues to warm, it may be approaching a critical climate threshold beyond which rapid and potentially permanent—at least on a human timescale—changes not anticipated by climate models tuned to modern conditions may occur.”

The NRC *Abrupt Impacts* report analyzed abrupt climate change in the physical climate system and abrupt impacts of ongoing changes that, when thresholds are crossed, can cause abrupt impacts for society and ecosystems. The report considered destabilization of the West Antarctic Ice Sheet (which could cause 3–4 meters (9–12 feet) of potential sea level rise) as an abrupt climate impact with unknown but probably low probability of occurring this century. The report categorized a decrease in ocean oxygen content (with attendant threats to aerobic marine life); increase in intensity, frequency, and duration of heat waves; and increase in frequency and intensity of extreme precipitation events (droughts, floods, hurricanes, and major storms) as climate impacts with moderate risk of an abrupt change within this century.

¹⁶⁵ National Research Council. 2011. *Understanding Earth's Deep Past. Lessons for Our Climate Future*. p.1. Available at <https://www.nap.edu/catalog/13111/understanding-earths-deep-past-lessons-for-our-climate-future>

¹⁶⁶ *Ibid.*, p.138.

The NRC Abrupt Impacts report also analyzed the threat of rapid state changes in ecosystems and species extinctions as examples of an irreversible impact that are expected to be exacerbated by climate change. Species at most risk include those whose migration potential is limited, whether because they live on mountaintops or fragmented habitats with barriers to movement, or because climatic conditions are changing more rapidly than the species can move or adapt. While the NRC determined that it is not presently possible to place exact probabilities on the added contribution of climate change to extinction, they did find that there was substantial risk that impacts from climate change could, within a few decades, drop the populations in many species below sustainable levels, thereby committing the species to extinction. Species within tropical and subtropical rainforests, such as the Amazon, and species living in coral reef ecosystems were identified by the NRC as being particularly vulnerable to extinction over the next 30 to 80 years, as were species in high-latitude and high-elevation regions.

Since the 2009 Endangerment Finding, the USGCRP NCA3, and multiple NRC assessments have projected future rates of sea level rise that are 40 percent larger to more than twice as large as the previous estimates from the 2007 IPCC 4th Assessment Report due in part to improved understanding of the future rate of melt of the Antarctic and Greenland Ice sheets. These assessments continue to recognize that there is uncertainty inherent in accounting for ice sheet processes. Additionally, local sea level rise can differ from the global total depending on various factors. The east coast of the US in particular is expected to see higher rates of sea level rise than the global average. The NCA3 states that “five million Americans and hundreds of billions of dollars of property are located in areas that are less than four feet above the local high-tide level,” and the NCA3 finds that “[c]oastal infrastructure, including roads, rail lines, energy infrastructure, airports, port facilities, and military bases, are increasingly at risk from sea level rise and damaging storm surges.”¹⁶⁷

Events outside the US, as also pointed out in the 2009 Endangerment Finding, will also have relevant consequences. The NRC Climate and Social Stress assessment concluded that it is prudent to expect that some climate events “will produce consequences that exceed the capacity of the affected societies or global systems to manage and that have global security implications serious enough to compel international response.” The NRC National Security Implications assessment recommends preparing for increased needs for humanitarian aid; responding to the effects of climate change in geopolitical hotspots, including possible mass migrations; and addressing changing security needs in the Arctic as sea ice retreats.

¹⁶⁷ Melillo, J. M., T. Richmond, and G. W. Yohe, Eds. 2014. *Climate Change Impacts in the United States: The Third National Climate Assessment*. US Global Change Research Program, p. 9. Available at <http://www.globalchange.gov/browse/reports/climate-change-impacts-united-states-third-national-climate-assessment-0>

These assessments and observed changes make it clear that reducing emissions of greenhouse gases across the globe is necessary in order to avoid the worst impacts of climate change, and underscore the urgency of reducing emissions now. Moreover, due to the time lags inherent in the Earth's climate, the NRC Climate Stabilization Targets assessment notes that the full warming from any given concentration of CO₂ reached will not be fully realized for several centuries, underscoring that emission activities today carry with them climate commitments far into the future.

5.7.3 Fiscal Implications of Coal

Federal, state, and local governments collect revenues from coal operations through various taxes, fees, and royalties. This section summarizes the revenue mechanisms and describes how revenues are disbursed.

Revenue and Disbursement Associated with Federal Royalties, Bonus Bids, and Rents

The Federal government receives revenue from coal leasing in three ways:

- Bonus bids
- Rental fees
- Production royalties

These revenues are collected and disbursed by the ONRR. In addition to these three channels, the ONRR also collects and tracks “other revenues” that consist of advance royalty payments, minimum royalty payments, estimated royalty payments, settlement agreements, and interest. Over the last 10 years, average annual revenues from coal leasing have amounted to slightly more than \$1 billion, representing approximately one-quarter of all revenues associated with onshore Federal minerals collected by the ONRR. **Table 5-7**, below, shows the revenues collected from coal in fiscal year 2015 associated with Federal coal leases by state, as well as the 10-year average by state and revenue type.

Over the last 10 years, almost 90 percent of total revenues collected from coal leases originated in Wyoming. Rent and other revenues generally represent a small proportion of overall revenue with less than 5 percent in any state and less than 0.5 percent of the national total. Bonus bids (36 percent) and royalties (63.6 percent) make up the greatest percentage of overall revenues from coal leasing.¹⁶⁸

¹⁶⁸ Bonus bids actually make up a relatively small proportion of the total revenue by state (less than 10 percent) with the exception of Wyoming. On average, bonus bids have represented about 40 percent of revenues from leases in Wyoming.

Table 5-7
Summary of Federal Revenues Associated with Coal Leases

State	Fiscal Year 2015 Total	10-year Average				
		Bonus	Other Revenues	Rent	Royalties	Total
Alabama	\$87,791	\$25,645	-\$102,705	\$12,120	\$3,810,903	\$3,745,963
Colorado	\$45,946,041	\$2,799,763	\$307,583	\$183,152	\$47,004,798	\$50,295,297
Kentucky	\$158,280	\$52,935	\$10,200	\$15,923	\$1,110,040	\$1,189,098
Montana	\$43,259,597	\$3,489,852	\$2,137,707	\$130,007	\$38,823,202	\$44,580,768
Oklahoma	\$825,481	\$80,999	\$2,655	\$36,382	\$723,083	\$843,118
North Dakota	\$3,483,815	\$64,906	\$0	\$33,176	\$1,244,067	\$1,342,149
Utah	\$34,545,089	\$1,338,104	\$98,931	\$225,425	\$28,753,933	\$30,416,393
Wyoming	\$987,724,580	\$372,599,892	\$842,377	\$555,832	\$550,402,368	\$924,400,469
Total	\$1,116,030,675	\$380,452,096	\$3,296,747	\$1,192,017	\$671,872,395	\$1,056,813,255

Source: ONRR 2016

The Mineral Leasing Act specifies that 50 percent of Federal revenues from leasable minerals (including coal) are paid to the US Treasury (40 percent appropriated to the Reclamation Fund and 10 percent to the General Fund), and 50 percent are paid “to the State within the boundaries of which the leased land is located or the deposits were derived” (30 USC, Subsection 191[a]). The Act further states that “[i]n determining the amount of payments to the States...beginning in fiscal year 2014 and for each year thereafter, the amount of such payments shall be reduced by 2 percent for any administrative or other costs incurred by the United States in carrying out the program authorized by this chapter, and the amount of such reduction shall be deposited to miscellaneous receipts of the Treasury” (30 USC, Subsection 191[b]). Thus, States effectively receive 49 percent of the revenues collected on leases within their state. The Act also recommends that “the legislature of the State may direct giving priority to those subdivisions of the State socially or economically impacted by development of minerals leased under this Act, for (i) planning, (ii) construction and maintenance of public facilities, and (iii) provision of public service” (30 USC, Subsection 191[a]). Given this recommendation, states have broad discretion in using these funds, and each state distributes them differently.

For example, Wyoming distributes mineral royalty and bonus payments to a range of funds, including the School Foundation Fund, School Construction Fund, Highway Fund, General Fund, and Budget Reserve Account. Portions of these payments are also distributed directly to cities and towns; cities, counties, and special districts capital construction; the community college commission; and the University of Wyoming. **Table 5-8**, below, summarizes the distribution of payments in Wyoming in fiscal year 2015 for payments associated with all Federal mineral leases (including coal). Based on the current level of revenues generated from coal leases, approximately 60 percent of the total distribution could be attributed to coal.

Table 5-8
State of Wyoming's Distribution of Federal Mineral Revenues

Funds / Recipient	Fiscal Year 2015
Cities & Towns	\$18,562,500
Cities, Counties & Special Districts Capital Const.	\$13,050,000
Foundation Fund	\$251,827,747
School Capital Construction	\$215,609,844
School Districts – Grants	\$5,346,000
Highway Fund / State Roads	\$66,472,500
1% General Fund	\$2,000,000
University of Wyoming	\$13,365,000
Community College Commission	\$1,600,000
Budget Reserve Account	\$326,149,640
Total	\$913,983,231

Source: Wyoming State Treasurer's 2015 Report (p. 52)

Funds distributed directly to cities and towns are generally based on population. The funds allocated to cities, counties, and the special districts capital construction account allow for grants or loans to district construction projects when specific circumstances are met. As shown in the table, a substantial proportion of the funds are allocated to schools. The Foundation Fund is a major revenue source to the Wyoming's Department of Education's annual budget and supports K-12 funding throughout the state.

Other Federal Taxes and Fees Associated with Coal Production

In addition to Federal revenues in the form of royalties, rents, and bonus bids, all coal mining operations are subject to:

- A per ton reclamation fee established by SMCRA, as amended
- The Black Lung Excise Tax enacted under Black Lung Benefits Revenue Act of 1977

Reclamation Fee

Title IV of the SMCRA established an Abandoned Mine Reclamation Fund (Fund)¹⁶⁹ that is administered by OSMRE. The primary source of revenue for the Fund is a reclamation fee paid by operators of coal mining operations. Currently, the fees are \$0.28 per ton of non-lignite coal produced by surface coal mining and \$0.12 per ton of non-lignite coal produced by underground mining or 10 percent of the value of the coal at the mine, whichever is less. The fee for lignite coal is 8 cents per ton or 2 percent of the value of the coal at the mine, whichever is less. SMCRA specifies how the collected funds are used, including "reclamation and restoration of land and water resources adversely affected by past coal mining" and grants to states to accomplish the purposes of Title IV (30 USC, Subsection 1231[c]).

¹⁶⁹ 30 USC, Section 1232

In addition, interest is earned on the Fund, which is used to make transfers to three health care plans that are part of the United Mine Workers of America Health and Retirement Fund (30 USC, Subsection 1231[e]). Since SMCRA's enactment in 1977, the OSMRE has collected over \$10.5 billion in fees and distributed more than \$8.0 billion for grants to states and tribes, transfers to the health care plans, and its own operation of the national program to reclaim land and waters damaged by coal mining before SMCRA's passage.¹⁷⁰ In fiscal year 2015, OSMRE collected about \$195 million in fees, and the average between fiscal year 2011 and fiscal year 2015 was just over \$220 million annually.¹⁷¹

Black Lung Excise Tax

The Black Lung Excise Tax became effective in 1978 with the passage of the Black Lung Benefits Reform Act that enacted the Black Lung Disability Trust Fund. The departments of Labor, Treasury, and Health and Human Services jointly administer the fund. Currently, the excise tax is \$1.10 per ton on underground-mined coal and \$0.55 cents per ton on surface-mined coal, in either case not to exceed 4.4 percent of the sale price.¹⁷² Between 2009 and 2014, the average annual collections from this excise tax were approximately \$595 million.¹⁷³ The Department of Labor's Division of Coal Mine Workers' Compensation administers the Black Lung Program and uses funds to compensate "coal miners who are totally disabled by pneumoconiosis arising out of coal mine employment, and to survivors of coal miners whose deaths are attributable to the disease" and provide "eligible miners with medical coverage for the treatment of lung diseases related to pneumoconiosis."¹⁷⁴

State and Local Taxes and Fees Associated with Coal Production and Operations

State and local governments collect revenues from coal mining operations through a variety of channels. This section provides an overview of these revenue streams.

Severance Taxes

Many states collect severance taxes from the production of non-renewable mineral resources, regardless of the surface land owner. Severance tax rates vary by state and can be based on value or volume. Not all states collect

¹⁷⁰ Office of Surface Mining Reclamation and Enforcement. 2016. Reclaiming Abandoned Mine Lands. Available at: <http://www.osmre.gov/programs/AML.shtm>

¹⁷¹ Office of Surface Mining Reclamation and Enforcement. 2016. Grant Distribution. Available at: <http://www.osmre.gov/resources/grants.shtm>

¹⁷² Department of Labor. 2016. Fiscal year 2016 Detailed Budget Documentation - Black Lung Disability Trust Fund. Available at: <https://www.dol.gov/general/budget/index-2016>

¹⁷³ Internal Revenue Service. 2016. Federal Excise Taxes Reported to or Collected by the Internal Revenue Service, Alcohol and Tobacco Tax and Trade Bureau, and Customs Service, by Type of Excise Tax. November 22, 2016. Available at: <https://www.irs.gov/uac/soi-tax-stats-historical-table-20>

¹⁷⁴ Department of Labor. 2016. About the Black Lung Program. Available at: <https://www.dol.gov/owcp/dcmwcl/>

severance taxes, and, for those that do, the approach and level of the severance tax rate varies widely. Many of the states allow for some deductions and exceptions on severance taxes. Along with variation in the collection of severance taxes, the distribution of these revenues to state and local funds varies widely.

Taxes on Production and Property

In addition to severance taxes, many states collect tax revenues based on the value of coal produced in a given year, or the value of the real and personal property of coal operations.

An ad valorem tax is one based on the monetary value of an item, including property. States that have an ad valorem tax on coal production may refer to the tax as a gross products or gross proceeds tax, based on the total value of the item. Property taxes are ad valorem taxes applied to real and personal property. Real property generally refers to fixed property, such as land and buildings (e.g., the land in which a coal mining operation is located and any fixed structures). Personal property typically refers to property that can be moved, such as most equipment and vehicles used in the mining process. It is important to note that Federal land is exempt from real property tax. However, any improvements on Federal lands associated with a private operation are typically subject to property tax.

Ad valorem taxes on coal production and property associated with coal mining are primarily collected by local governments and some states. These taxes are typically set by taxing entities at the state and local level, including counties, cities, towns, school districts, and special districts (e.g., hospital district, soil and water conservation district, regional transportation authority, etc.). Commonly, the county treasurer is responsible for the collection of these taxes and then distributes the collections back to the taxing entities.

Other Local Taxes

Two additional tax revenue sources may exist that are applied to coal operations. One source, which would not apply to Federal coal leases, would be royalty and rents collected by states from state-owned coal resources. The other is sales and use taxes. Capital investment and other operating expenses at coal operations may generate additional state and local revenues.

5.8 FEDERAL COAL LEASING PROCESS

The BLM is the Federal agency that is responsible for leasing Federal coal. As previously discussed, the BLM coordinates with other Federal, state, and local agencies and governments that may be affected by coal-related activities and with representatives of industry and environmental groups that may be affected by how Federal coal is leased and managed. The BLM leases coal through a competitive sales process using a fixed royalty-variable cash bonus bidding system. The BLM prepares the paperwork necessary to evaluate tracts for sale,

holds the lease sale using sealed bidding procedures, and evaluates the high bids received to determine if they constitute FMV.

5.8.1 Land Use Planning

The first major step in the Federal coal leasing process is land use planning. Decisions resulting from the land use planning process identify lands acceptable for further consideration for coal leasing. These areas are identified after reviewing all lands in the planning area using the four screens established by the Federal coal management program in 1979 and memorialized in Federal regulations. The four screens are:

1. Identification of areas with coal development potential - areas are eliminated from coal leasing consideration if they do not possess coal development potential (43 CFR, Subparts 3420.1-4[e][1]).
2. Determining if lands are unsuitable for coal development - areas are eliminated if they contain coal but are judged unsuitable for surface coal mining after the application of 20 coal unsuitability criteria, if exemptions and exception do not apply (43 CFR, Subparts 3420.1-4[e][2]; 43 CFR, Subpart 3461).
3. Multiple use conflict analysis - additional coal areas may be eliminated on multiple use grounds if other resource values are determined to be more valuable than coal (43 CFR, Subparts 3420.1-4[e][3]).
4. Surface owner consultation - potential elimination of split-estate mineral lands where surface mining is proposed and a significant number of qualified surface owners have stated a preference against surface coal mining (43 CFR, Subparts 3420.1-4[e][4]).

Pursuant to the Mineral Leasing Act and BLM regulations, lands cannot be offered for lease if they are not identified by the BLM as acceptable for further consideration for coal leasing. This is also true where lands overlying Federal coal resources are managed by a Federal surface management agency other than the BLM.

5.8.2 Competitive Leasing Processes

Federal coal regulations at 43 CFR, Part 3420 identify two types of competitive leasing processes: regional leasing and lease by application. The BLM no longer employs regional leasing; the last “certified” Federal coal production region, the Powder River Coal Production Region, was decertified in 1990 (see **Section 5.3** for more information).

Regional Coal Leasing

Under the previous regional coal leasing process—which is described in 43 CFR, Part 3420—the BLM would set leasing levels and select potential coal leasing tracts for sale based on land use planning, expected coal demand, and potential environmental and economic impacts. This process required close consultation

with local governments and citizens through a Federal/state advisory board known as a Regional Coal Team. All costs associated with conducting regional leasing were borne by the Federal Government.

Under this process, regional leasing levels were established by the Secretary of the Interior based on recommendations of Regional Coal Teams. Leasing levels were based on the following factors (43 CFR, Subpart 3420.2):

1. Advice from governors of affected states as expressed through the regional coal team
2. The potential economic, social, and environmental effects of coal leasing on the region, including recommendations from affected Indian tribes
3. Expressed industry interest in coal development in the region and indications of the demand for coal reserves
4. Expressed interests for special opportunity sales
5. Expected production from existing Federal coal leases and non-Federal coal holdings
6. The level of competition within the region and recommendations from the Department of Justice
7. US coal production goals and projections of future demand for Federal coal
8. Consideration of national energy needs
9. Comments received from the public in writing and at public hearings
10. Other pertinent factors

The Regional Coal Team would delineate tracts in any areas acceptable for further consideration for leasing whether or not expressions of leasing interest had been received for those areas. Upon completion of tract delineation and preparation of the tract profiles, the Regional Coal Team would rank the tracts in classes of high, medium, or low desirability for coal leasing. Three major categories of consideration would be used in tract ranking: coal economics, impacts on the natural environment, and socioeconomic impacts (43 CFR, Subparts 3420.3-4).

The delineated tracts selected for further study would be analyzed in a regional EIS. These tracts would be grouped into leasing alternatives, with at least one alternative falling into the recommended leasing level range. Before making a final leasing decision, the Secretary would consult with the governors of the affected states, the surface management agencies, and the Department of Justice. The Secretary's final decision would include whether to offer coal for lease and if so, how much coal to offer, when to hold the lease sale (or sales), and how the coal would be offered for sale.

Under the regional leasing process, if a mine were in a situation in which it was running out of reserves to maintain existing production or existing contracts, prior to the next scheduled regional coal lease sale, the regulations allow for the filing of an emergency LBA.¹⁷⁵ Emergency lease sales are held when coal is needed within 3 years to maintain production at existing mines, to meet contractual obligations, or to prevent the bypass of Federal coal.

Lease-by-Application

All current leasing under the Federal coal program is conducted through the LBA process (43 CFR, Subpart 3425; see **Section 5.4.3** for more information). Under this process, coal tracts are applied for by an adjacent mine operator in order to maintain production levels and extend the life of the mine. The processing of LBAs has many steps, some running concurrently, but in general, the broad steps taken prior to offering a tract for sale are:¹⁷⁶

1. Receipt and initial review of the application for completeness and conformance with the applicable land use plan, and if complete, a cost recovery account is established
2. Ensure adequate data exists to determine the amount and characteristics of coal reserves within (and if applicable outside of) the application boundary (exploration)
3. Develop a preliminary tract delineation
4. Prepare a document to comply with the NEPA, preparing the decision on whether to offer a selected coal tract for sale and which tract to offer
5. Prepare and finalize all reports associated with the presale FMV estimate
6. Offer the selected tract for competitive bid

Review of Application

The application must be filed in the proper BLM State Office (SO) having jurisdiction over the lands and/or minerals involved. Once received, the SO assigns a serial number and reviews the application for completeness, ensuring the lands are properly described and available for lease in the approved Resource Management Plan.¹⁷⁷ The SO notifies the appropriate governor(s) that an LBA has been received. Staff confirms the application conforms to the land use plan, and the lands have been determined to be acceptable for further consideration for coal leasing. If the application is located on lands where the surface is administered by another agency, the BLM must confirm with the

¹⁷⁵ 43 CFR, Part 3420

¹⁷⁶ 43 CFR, Part 3420

¹⁷⁷ Leases within the decertified Powder River Coal Production area will take the application before the Powder River Regional Coal Team to get a recommendation from that team prior to processing.

surface management agency that coal leasing is in conformance with their approved land use plan. If private lands are noted in the application, it should be determined as soon as possible if a qualified surface owner is present, and whether the applicant has received consent to mine.

The applicant for a new Federal coal lease is required to reimburse the BLM for all processing costs incurred by the BLM through a cost recovery account. The processing costs include reimbursement of the BLM's time to provide information for and review of the NEPA document, and time to prepare the geologic, engineering, economic, and valuation documents that establish the presale FMV estimate. Total processing costs will be disclosed in the lease sale notice, and if the successful bidder is not the applicant, that bidder will be required to reimburse the applicant for the cost recovery fees.

Coal Exploration

The BLM must have adequate data to determine the quality and quantity of recoverable coal before a tract can be delineated and recommended for leasing. If geologic information is inadequate, the BLM will ask the applicant to conduct exploration drilling. A BLM-issued exploration license is required to conduct exploration activities on unleased Federal coal. However, the license confers no right to lease the lands where the exploration occurs. Applicants for exploration licenses must provide opportunity for other parties to participate in the exploration, on a pro rata cost share basis. A public Notice of Invitation to Participate is published in the local newspaper as well in the *Federal Register*.

Developing a Preliminary Tract

Production maintenance tracts generally do not contain sufficient recoverable reserves necessary to support an entirely new operation. Recoverable reserves are present only in sufficient quantities to extend the life of an adjacent, existing mine, or to permit expansion of the mine's annual production. The tract nominated for leasing by the applicant may be reconfigured by the BLM for reasons of Public Interest and resource conservation. Some common reasons to reconfigure the tract are in order to achieve maximum economic recovery and reduce the potential for bypass, increase potential value, promote competition, reduce potential impacts on other resources, and accommodate qualified surface owner constraints.

In order to enhance competition among companies, if a portion of an applied for tract lies near a competing mine, the BLM may split lands in an LBA into individual tracts in the hopes a competing mine may place a bid. The BLM will also try to delineate a tract that will enhance FMV. Often the BLM does this by pacing the rate of leasing to match the rate of coal production. Rapid leasing in excess of reserve needs could adversely affect bonus values, and the BLM is obligated not to lease speculative coal resources. The BLM attempts to configure these tracts to contain only those reserves needed to meet

production needs, recover all coal resources, avoid speculation or high grading, and encourage competition.

Preparing the NEPA Document/Decision to Lease

All coal lease applications will undergo NEPA analysis in the form of an environmental analysis or EIS with full public involvement consistent with regulation and policy. The BLM will also invite agencies involved with post-lease decision-making—often the OSMRE, the Forest Service, or other Surface Management Agency—and the State RA to become Cooperating Agencies in preparing the NEPA document.

Through NEPA, the BLM will evaluate the potential direct, indirect, and cumulative environmental and socioeconomic impacts of leasing and developing Federal coal in the application area. The BLM evaluates the environmental impacts of coal mining that would be expected to result if leases are issued for maintenance coal tracts. Although the BLM does not authorize mining by issuing leases for Federal coal, the impacts of mining the coal are considered in the environmental analyses, because it is a logical consequence of issuing a maintenance lease next to an adjacent mine.

Determining Fair Market Value

All successful lease bonus bids must meet or exceed the FMV established by the BLM prior to offering the lease for sale. The estimate of FMV is prepared in accordance with standard appraisal methods and is kept strictly confidential. The term is defined as the “amount in cash, or on terms reasonably equivalent to cash, for which in all probability the coal deposit would be sold or leased by a knowledgeable owner willing, but not obligated to sell or lease to a knowledgeable purchaser who desires but is not obligated to buy” (43 CFR, Subparts 3400.0-5[n]).

The presale estimate of the FMV relies on information about the geology and characteristics of the coal in the application area, the engineering report that considers an optimum mine plan, mining cost associated with extracting the identified reserves in the preferred tract, an economic report that establishes the market for the coal lying within the selected tract, and finally the appraisal/valuation report. The economic report identifies the most likely market(s) for coal lying within the tract, including an evaluation of whether the coal is suitable for export. The BLM is also required by statute and regulation to conduct a public hearing between the Draft and Final EIS to receive comments from the public on the tract proposed for leasing to inform the calculation of the FMV.

The BLM uses a sealed bid system as a measure to ensure FMV is received and the Public Interest is protected. In most instances, particularly in coal areas where lease sales are held on a consistent basis, the BLM keeps the presale estimate of FMV, and the information used to establish this value, confidential even after a lease sale is complete.

Conducting the Sale and Issuing the Lease

Once a decision is made to move forward and offer a coal tract for competitive sale, an announcement will be made in proposed and final sale notices in the *Federal Register* that give the time, date, and procedures of the lease sale and description of the coal to be offered. Other methods of notifying the public of the sale may also be employed.

The lease sale begins with receipt of sealed bids. All sealed bids are opened at the public lease sale. The apparent high bid is accepted contingent upon it meeting or exceeding the BLM's presale estimate of FMV, adjudication requirements (bidders must meet regulatory requirements necessary to be qualified to hold a Federal coal lease), and the appropriate fees and payments being attached.

Before a lease is issued, the lessee must furnish a bond in an amount determined by the agency to ensure compliance with the terms and conditions of the lease and to provide a bond to cover the remaining balance of the bonus bid.¹⁷⁸ A sale panel consisting of a mineral appraiser/economist, geologist, mining engineer, and Washington Office delegate will review the apparent high bid to determine if it has met or exceeded the presale FMV.

If the apparent high bid meets the FMV and the bidder is qualified to hold a Federal coal lease, the recommendation is sent before the BLM Authorized Officer, who will accept the bid and send the provided information to the Department of Justice for antitrust review. Upon hearing from Department of Justice, the Authorized Officer will either issue or reject the lease.

Should the apparent high bid not meet the FMV, the BLM Authorized Officer will send notice rejecting the bid and the right to appeal. The notice also allows a bidder to request the BLM to reoffer a tract if they waive their right to appeal. If no bid is received during the reoffer, the decision to hold the sale is complete, and the BLM Authorized Officer will close the case with no further action.

Public Interest

Throughout the coal leasing process, the BLM takes into careful consideration whether leasing the applied for lands would be in the public interest (30 USC, Sections 181-287, 351-359; 43 CFR, Subparts 3425.1, 3472.1). The regulations state the BLM must reject an application if "leasing of the land covered by the application, environmental or other sufficient reasons, would be contrary to the public interest" (43 CFR, Subparts 3425.1-8[a][3]). Many, often competing, interests must be considered in arriving at a Public Interest determination,

¹⁷⁸ Lessees are required to pay the bonus bids in five equal installments beginning with the first payment due at the time of the lease sale and the remaining payments due on the following four anniversary dates of the lease. Per the Energy Policy Act of 2005, if a successful bidder can demonstrate they have a history of timely payments, the requirement to cover any outstanding balance with a bond can be waived.

including, but not limited to, the applicant's request; the environmental impacts; the economic benefit to the local, state, and national economy; rights of qualified surface owners; ensuring a fair return for the use of the public resources; and conservation of the public resource (BLM Manual 3435).

The Federal Coal Lease

A Federal coal lease grants the right to explore for, extract, remove, and dispose of some or all of the coal deposits that may be found on the leased lands. After a lease is issued, the BLM will review and approve a Resource Recovery and Protection Plan, which describes how maximum economic recovery of the coal resource will be achieved. The BLM does not, however, approve any mining activities. A Federal coal lease is granted on the condition that the lessee will obtain the appropriate permits and licenses from other Federal, state, and local agencies. Before the lessee may initiate any mining activity, as required by SMCRA, OSMRE or the state RA must approve a permit. In addition, the Assistant Secretary, Land and Minerals Management, after receiving a recommendation from OSMRE, must approve a mining plan as required by the Mineral Leasing Act. As part of a permit issued by OSMRE or the state RA, the permittee is required to post a reclamation bond to cover the costs of returning the land to the pre-mining state.

A Federal coal lease has an initial term of 20 years, but it may be terminated within 10 years if the coal resources are not diligently developed. A lease is readjusted at the end of the 20-year primary term and every 10 years thereafter for the life of the lease. Diligent development occurs when the lessee mines one percent of the established recoverable reserves. Once that threshold is met, the lessee is required to continue to produce one percent of their original recoverable reserves on an annual basis, or pay an advance royalty.¹⁷⁹ Lessees who fail to comply with continued operation provisions subject their leases to cancellation. Because mines may be located in areas with various coal owners and mining occurs in a logical sequence, establishing a logical mining unit¹⁸⁰ allows lessees to consolidate the diligent development and continuous operations requirements for Federal leases within the boundary of the mine.

¹⁷⁹ Upon request by the lessee, the BLM may accept, for a total of not more than 20 years, the payment of advance royalties in lieu of continued operation, consistent with the regulations. The advance royalty will be based on a percentage of the value of a minimum number of tons determined in the manner established by the advance royalty regulations in effect at the time the lessee requests approval to pay advance royalties in lieu of continued operation (30 USC, Sections 181-287; 20 USC, Sections 351-359 (acquired lands); 43 CFR, Part 3483; BLM Coal Lease Form 3400-12).

¹⁸⁰ A logical mining unit is an administrative construction that allows the lessee or operator to consolidate the diligent development and continued operations requirements for all the Federal leases and other coal tracts within the boundaries of the mine. A logical mining unit provides for continuity in management of the coal resource whenever the geologic characteristics of a coal seam cross property boundaries. A logical mining unit has been defined as an area of land in which the coal can be developed in an efficient, economical, and orderly manner as a unit with due regard for conservation of the coal and other resources. An application is required to be filed with the BLM for approval to form a logical mining unit.

At any time, a lessee may surrender, in whole or in part, its Federal coal lease by filing a written request for relinquishment. Before a lease can be relinquished, the lessee must be in compliance with all lease terms and conditions, and have paid all payments and fees.

CHAPTER 6

PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

The BLM has received a large amount of substantive input from a diverse array of stakeholders through both the internal and external scoping process. **Chapter 5** includes a summary of the comments raised through the scoping process, and **Appendix D** includes a full record of all comments received. The BLM has undertaken a thorough review of the scoping record and developed a preliminary framework for the PEIS based on this input. This chapter presents a purpose and need statement, reform options that meet identified policy objectives to be carried forward for further consideration by the BLM, a rationale for dismissing some options from further consideration, a framework for developing program reform alternatives, issues for analysis, an analytical approach, analytical considerations, and a schedule for completion of the PEIS.

6.1 PURPOSE AND NEED STATEMENT

An EIS “shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action” (40 CFR, Subpart 1502.13). For many types of actions, the “need” for the action can be described as the underlying problem or opportunity to which the BLM is responding with the action. The “purpose” can be described as a goal or objective that the BLM is trying to reach (BLM NEPA Handbook Section 6.2).

6.1.1 Need for the Federal Action

The need for this action is to undertake a comprehensive review of the Federal coal program and to consider how the program can be improved and modernized in the areas of fair return, climate change, resource management and protection, and program administration. The last time the Federal coal program received a comprehensive review was in the mid-1980's, and most of the existing regulations which were promulgated in the late 1970's, have been only slightly modified since that time. Further, the direct, indirect, and

cumulative impacts of the Federal coal program have not been fully analyzed under NEPA in over 30 years. As described in Secretarial Order 3338, this has led to calls from a variety of stakeholders, including the GAO, OIG, members of Congress, interested stakeholders, and the public for review of many facets of the Federal coal program.

This need is a part of the BLM's stewardship role as a proprietor and sovereign regulator, which is charged by Congress with managing and overseeing mineral development on the public lands, not only for the purpose of ensuring safe and responsible development of mineral resources, but also to ensure conservation of the public lands; the protection of their scientific, historic, and environmental values; and compliance with applicable environmental laws. In addition, the BLM has a statutory duty to ensure a fair return to the taxpayer and broad discretion to decide where, when, and under what terms and conditions mineral development should occur.

Based primarily on the input received through the listening sessions and scoping process, it appears that modernization of the Federal coal program is warranted. While energy markets, communities, environmental conditions, and national priorities have changed dramatically, the program has remained fairly static in its administration over the last thirty years.

There are three general areas in particular that should be modernized to ensure that the program continues to accomplish its responsibilities to the American public. In each of these areas additional analysis is necessary prior to the recommendation of specific policy choices, in order to provide a complete understanding of the likely impacts of various policies on energy markets, electricity prices, employment, and other critically important issues. These issues will be the focus areas of analysis for the PEIS going forward. However, it is possible at this stage in the process to identify the most promising policies for consideration, and those are also set out below. In addition, there are some simpler good government improvements that can be made without significant additional analysis. These may be undertaken in parallel with the PEIS process and they are set out below as well.

The three general areas requiring modernization are: fair return to Americans for the sale of their public coal resources; impact of the program on the challenge of climate change and on other environmental issues; and efficient administration of the program in light of current market conditions including impacts on communities.

First, the program must ensure that the public owners of this coal receive a full and fair return for this resource. Addressing this issue will benefit not only the general public but the states and communities in which Federal coal is located, since 50 percent of most revenue generated by the program goes to those states.

In 2013, both GAO and OIG issued reports making specific recommendations regarding the Federal coal program, particularly with respect to the leasing process and fair market value. The BLM addressed these recommendations through the development of new protocols and issuance of policy guidance, a manual, and a handbook. In the broader context of these reports, stakeholders have expressed additional concerns with what they believe are fundamental weaknesses in the program with respect to fair return.

These concerns arise, at least in part, because there is currently very little competition for Federal coal leases. About 90 percent of lease sales receive bids from only one bidder, typically the operator of a mine adjacent to the new lease, given the investment required to open a new mine. While the BLM conducts a peer-reviewed analysis to estimate a pre-sale fair market value of the coal and will not sell a lease unless the bid meets or exceeds that value, commenters have questioned whether an accurate fair market value can be identified in the absence of a truly competitive marketplace. As OIG pointed out, “since even a 1-cent-per-ton undervaluation in the fair market value calculation for a sale can result in millions of dollars in lost revenues, correcting the identified weaknesses could produce significant returns to the Government.”¹⁸¹

Commenters have also raised concerns about the royalty rates in Federal leases, which are set by regulation at a fixed 8 percent for underground mines and not less than 12.5 percent for surface mines. Some stakeholders have suggested that the large volumes and relatively low costs of Federal coal, which currently represents approximately 42 percent of total domestic production, have the effect of artificially lowering market prices for coal, further reducing the amount of royalties received. There are also concerns that the Federal coal program obtains even lower returns through certain types of leasing actions, such as lease modifications, and through royalty rate reductions, which may result in royalty rates as low as 2 percent. In addition, stakeholders have noted that the \$100/acre minimum bid requirement has not been updated since it was established in the regulations in 1982. Some stakeholders further suggest that a fair return to the taxpayer should also include compensation for externalities such as the environmental damage (or lost environmental benefits) from the removal and combustion of the coal. Through the PEIS, the BLM will consider reform options to address these and other aspects of fair return.

Second, the program must ensure appropriate alignment with US climate goals and adequately reflect the impact of the program on climate change. Virtually every community in the US is being impacted by climate change, and Federal programs have an obligation to be administered in a way that will not worsen and help address these impacts. The United States has pledged under the United

¹⁸¹ OIG. 2013. Coal Management Program, US Department of the Interior, Report No. CR-EV-BLM-0001-2012. June 2013. Available at <https://www.doioig.gov/sites/doioig.gov/files/CR-EV-BLM-0001-2012Public.pdf>

Nations Convention of Climate Change to reduce its greenhouse gas emissions by 26-28 percent below 2005 levels by 2025. Efforts are already being made to reduce US greenhouse gas emissions in line with this target through measures such as vehicle efficiency standards, the CPP, energy efficiency standards, requirements to reduce methane reductions from oil and gas production, and many other measures.

However, numerous scientific studies indicate that reducing greenhouse gas emissions from coal use worldwide is critical to addressing climate change. As noted above, the Federal coal program is a significant component of overall US coal production. In 2015, 42 percent of total US coal production occurred on Federal lands.¹⁸² When combusted, this Federal coal contributes roughly 10 percent of total US greenhouse gas emissions. Many stakeholders highlighted the tension between producing very large quantities of Federal coal while pursuing policies to reduce US greenhouse gas emissions substantially, including from coal combustion. Furthermore they stated that the current leasing system does not provide a way to systematically consider the climate impacts and costs to the public of Federal coal development, either as a whole or in the context of particular projects, and suggested tools such as royalty adders and compensatory mitigation.

Several of the most promising reforms in this area also are linked to fair return in that they would require an increase in the cost of this coal through price or royalty increases or compensatory mitigation to reflect and help to address its climate change impact. Like other fair return approaches, these reforms would benefit not just the public generally, but more specifically the states in which the Federal coal is located and their communities. Through the PEIS, the BLM will consider reform options to better align the Federal coal program with the challenges presented by climate change.

In addition, there is a need for program reform to better protect the nation's other natural resources (e.g., air, water, and wildlife). Commenters suggested a variety of options for improving protection and management of resources as part of the Federal coal program in accordance with the "multiple use" and "sustained yield" principals of FLPMA. Commenters expressed concern that the unsuitability criteria are not consistently applied at the land use plan level, which they believe disregards important landscape-scale land use allocation considerations. Commenters also suggested that the current unsuitability criteria should be revised and expanded to provide greater protection to important resources such as bats and Greater sage-grouse. Commenters requested that the BLM develop strategic leasing plans that would address resource issues at an appropriate scale and with consideration of the need for mitigation. Options were suggested for strengthening lease applicant

¹⁸² US Extractive Industries Transparency Initiative. Full dataset. Table I. Available at <https://useiti.doi.gov/downloads/Federal-production/>. See also EIA. Annual Coal Report. Available at <http://www.eia.gov/coal/annual/>

qualifications to ensure that future leases are only offered to companies that have a proven track record with successful environmental performance, including reclamation. Still other commenters suggested using a pricing mechanism (adder associated with royalties) to account for the environmental externalities associated with coal production and use such as air quality impacts. Through the PEIS, the BLM will consider reform options to improve the protection of natural resources.

Finally, there is a need for common-sense reforms to the Federal coal program that provide for the efficient and orderly administration of coal on Federal lands in light of current market conditions. A number of commenters expressed concern over the length of time it takes to obtain a Federal coal lease (in some cases 10+ years) and what they perceive as redundancies in the process between the other agencies involved. They urged the BLM to consider as part of the PEIS ways to improve the administration of the lease process itself. Others offered information to suggest that current leasing processes do not fully promote competition in the current marketplace. And many, particularly in coal states and communities, made a powerful case that the program administration does not appropriately consider or address the impact on communities from changes in the market. The BLM will consider reform options aimed at improving the administration of the Federal coal leasing process in all of these areas.

6.1.2 Purpose of the Federal Action

The purpose of this action is to identify, evaluate, and recommend comprehensive reforms to the Federal coal program. Through the PEIS, the BLM will consider how the program can be improved and modernized to foster the orderly development of BLM-administered coal on Federal lands in a manner that gives proper consideration to the impact of that development on important stewardship values while also ensuring a fair return to the American public.

Programmatic NEPA reviews address the general environmental issues relating to broad decisions, such as those establishing policies, plans, or programs, and can effectively frame the scope of subsequent site- and project-specific Federal actions.¹⁸³ The PEIS provides the BLM with an efficient and effective tool to consider a wide range of reasonable reform alternatives for the Federal coal program and adequately assess the cumulative effects of those alternatives across many factors such as market and climate effects. The analysis in the PEIS will inform, and possibly streamline, future decisions for individual actions under the Federal coal program through the ability to tier. Importantly, the PEIS provides an excellent venue for meaningful public involvement, collaboration

¹⁸³ Executive Office of the President, Council on Environmental Quality “Effective Use of Programmatic NEPA Reviews.” December 2014. Available at https://ceq.doe.gov/current_developments/docs/Effective_Use_of_Programmatic_NEPA_Reviews_Final_Dec2014_searchable.pdf

with interested parties, and ultimately transparent, accountable, and informed government decision-making.

6.2 OPTIONS AND ALTERNATIVES

6.2.1 Options to Be Evaluated

Table 6-1 outlines the reform options that the BLM is proposing to carry forward for further consideration that may be analyzed in the PEIS and used as the basis for alternatives development. The options are organized by the policy objectives described in the Need for Federal Action in **Section 6.1.1**.

Table 6-1
Options Proposed for Analysis by Policy Objective

Fair Return	Reduce/Account for Greenhouse Gas Emissions	Improve Resource Protection and Management	Increase Lease Process Efficiency
1. Increase royalty rate	1. Account for carbon-based externalities through royalty rate increase or royalty adder	1. Improve application of unsuitability criteria; modify criteria	1. Develop strategic leasing plans that allow for tiering of future lease decisions
2. Implement FMV process changes (i.e., transparency and consistency)	2. Require compensatory mitigation for greenhouse gas emissions	2. Develop strategic leasing plans that address landscape scale issues, multiple use, and mitigation planning	2. Create pre-application process
3. Limit the use and improve the transparency of royalty rate reductions	3. Lease based on a carbon budget	3. Account for additional coal-related externalities	3. Create a standardized lease application form and develop an electronic application platform
4. Increase rental rate	4. Create incentives for methane capture	4. Strengthen lease applicant qualification requirements	4. Establish a single team to develop FMV
5. Raise minimum bonus bid	5. No new leasing, with limited modifications	5. Apply environmental protections to existing leases	5. Work with other agencies to evaluate means for eliminating overlapping requirements and redundant processes
6. Implement inter-tract or modified inter-tract bidding processes to increase competition		6. Develop regional mitigation strategies for existing and new coal development (to address public health and environmental impacts)	6. Improve transparency in the leasing process
7. Evaluate current performance bonding amounts; increase bonding levels as necessary		7. Develop best management practices	
8. Convene a royalty policy commission			

The reform options presented were raised through the scoping process or developed through internal scoping conducted by the BLM's Interdisciplinary Team. These options are described in greater detail in the text that follows based on best available information. The options presented will be evaluated in terms of benefits, impacts, and overall feasibility, including the BLM's legal and statutory authority for implementation. The BLM may use the options in combination to develop alternatives to be considered in the PEIS, as described in more detail below. Options raised through the scoping process that the BLM proposes not to carry forward for further consideration are discussed in **Section 6.2.3**. Based on further analysis, some of the options identified in **Table 6-1** may also be eliminated from further consideration.

Fair Return

A central objective of the BLM's reform effort for the Federal coal program is the level of return that it provides to the American public. The BLM received a number of comments suggesting reform options that would help better reflect FMV and consequently improve return to the taxpayer. The Federal Government receives revenues generated through the mining of Federal coal in three ways: production royalties, bonus bids, and rental fees (see **Section 5.7.3** for more information). The BLM will assess the following options in terms of the degree to which they would improve fair return to the taxpayer as well as their overall feasibility and practicality.

- I. **Royalty Rate Increase:** The BLM will evaluate the ability of using the royalty rate to better reflect FMV and assess the impacts of increasing the royalty rate on Federal coal. Royalty rates are currently set by statute at a minimum of 12.5 percent of the gross value of the coal produced for surface mines and 8 percent for underground mines (43 CFR, Subparts 3473.3-2). The rate for surface mines may be increased on a lease-by-lease basis but may not be set below 12.5 percent. Currently, most leases contain a royalty rate of 12.5 percent. The BLM will analyze a range of royalty rate increases as part of the PEIS effort to secure fair return. The BLM will consider the effective royalty rate (royalty rate when accounting for deductions and royalty relief) for other federally leased commodities, considering royalties, bonus bids, and rental rates. This may include, but is not limited to basing the royalty rate on the market price for nearby regional coal, basing the royalty rate on the market price for non-Federal coal nationwide, or making the royalty rate commensurate with the rate used on other resources such as offshore oil and gas (18.75 percent). The BLM may also consider adjusting existing royalty rates upward until they are commensurate (on an energy content basis) with royalties that would be collected on substitute fuels, such as natural gas, or possibly consider a royalty rate aimed at maximizing revenues.

For context, the Council of Economic Advisers (CEA) in their study entitled, "The Economics of Coal Leasing on Federal Lands: Ensuring a

Fair Return to Taxpayers,”¹⁸⁴ estimated the necessary royalty rate in the year 2025 based on mine mouth prices to ensure a fair return as follows: 17 percent based on regional coal prices, 29 percent based on non-Federal nationwide coal, and 29 percent based on natural gas prices.¹⁸⁵ The CEA concluded that a policy goal of maximizing return to the taxpayer would require royalty rates of 304 percent¹⁸⁶ (equal to approximately a \$30/ton royalty charge on Powder River Basin coal), which would curtail future Federal coal production by more than half from projected levels (partially offset by increased production from other regions) while increasing revenue by \$2.7-\$3.1 billion. No other studies submitted during the scoping process went into this level of detail on royalty rate increases for the purposes of fair return.

Because royalty charges are related to production levels and gross revenues, the BLM will model the impact various royalty rates have on total Federal coal production and corresponding revenues. For example, the CEA study estimated that Federal coal production based on the royalty rate increases described above would decrease between 3 and 53 percent, respectively, and revenue would increase between \$0-290 million to \$2.7-3.1 billion annually.

The BLM will also evaluate in more detail than the CEA study how raising the royalty rate may depress bonus bids. As previously discussed, total returns are composed of revenues from royalty rates, bonus bids, and rental fees, less administrative costs. Increasing any single component may reduce one of the other components or vice versa. Revenue collection is split among these components as a risk-sharing mechanism between lessors and lessees.

Implementation of this option could be accomplished through policy under the Secretary’s discretion under the Mineral Leasing Act for surface mines; however, rulemaking would be required to increase royalty rates for underground mines. Additionally, rulemaking would be required if the regulatory minimum royalty rate is to be increased.

2. **Fair Market Value Transparency:** The BLM will consider various ways to build on processes that improve consistency and transparency in the FMV calculation process without jeopardizing the competitive process. These include the new oversight process in which the

¹⁸⁴ Council of Economic Advisers, Executive Office of the President. 2016. The Economics of Coal Leasing on Federal Lands: Ensuring a Fair Return to Taxpayers. June 2016. Available at https://www.whitehouse.gov/sites/default/files/page/files/20160622_cea_coal_leasing.pdf

¹⁸⁵ These percent values are relative to an estimated 9.3 percent weighted average royalty rate based on production in 2025 and accounting for waivers, suspensions, and reductions.

¹⁸⁶ The royalty rates increases pertain to mine mouth, initial point of sale, cost of coal. For most Federal coals, this is only a small portion of the totaled delivered cost of coal to a power plant. Therefore, the actual percent increase in price observed by the end user will be significantly lower than the values reflected here.

OVS/DME reviews the BLM's FMV calculations (see **Section 5.8.2**, Competitive Leasing Process), or the establishment of a single team to develop FMV. Regarding transparency, the BLM Handbook instructs that:

“While much of the data and information used to develop a pre-sale estimate of value have proprietary and confidential characteristics, it is the policy of the BLM that the Federal coal leasing processes are as transparent as the law and regulations allow. To this end, consideration must be given while developing reports that support FMV estimates to the ease with which sensitive, confidential, and proprietary data can be redacted to provide publicly available documents. It is not acceptable to redact an entire document. Further, consideration should be given to timely posting public versions of FMV related documents prominently on publicly available web sites after a successful lease sale, consistent with law and regulation.”¹⁸⁷

As part of the PEIS, the BLM will look at ways to improve the amount and timeliness of information available to the public for FMV, as well as improved transparency of the process. FMV process improvements will require, at a minimum, modification or additions to BLM policy and guidance to implement, and they may require rulemaking based on options to be evaluated.¹⁸⁸

3. **Royalty Rate Reductions:** The BLM will evaluate its current use of royalty rate reductions and consider ways to limit the use of those reductions. Under certain circumstances the BLM can, upon application by the lessee or operator, temporarily reduce the royalty rate for a specific area of coal. Since the passage of FCLAA in 1976, the BLM has frequently granted royalty rate reductions.¹⁸⁹ In their scoping comment letter, Taxpayers For Common Sense noted that the BLM has reduced the royalty rates on 35 of 80 Federal coal leases in 9 states during the last 25 years, more than half of which occurred between 2001 and 2007 based on data they obtained from the ONRR.¹⁹⁰

The general consideration for a royalty rate reduction is to encourage the greatest ultimate recovery of the coal resource. Analysis will be

¹⁸⁷ BLM. 2014. BLM H-3073-1, Coal Evaluation Handbook. October 12, 2014. Available at https://www.blm.gov/style/medialib/blm/wo/Information_Resources_Management/policy/blm_handbook.Par.58766.File.dat/H-3073-1.pdf

¹⁸⁸ Pursuant to Mineral Leasing Act § 201(a), “[n]o bid shall be accepted which is less than the fair market value[.]” The Mineral Leasing Act does not provide a definition for FMV. Changes to the FMV process may require modifications to 43 CFR, Subpart 3422.1.

¹⁸⁹ ONRR. 2016. Royalty Reporting (except Solid Minerals). Available at <http://www.onrr.gov/ReportPay/royalty-reporting.htm>

¹⁹⁰ Taxpayers For Common Sense. 2016. Scoping comment letter on Coal PEIS. July 28, 2016. See Volume 2 Appendix D.

needed to determine the overall revenue impact of royalty rate reductions and the potential for improved return if reductions were curtailed. Analysis will be needed to determine if limitations on royalty rate reductions could result in reduced revenue to the government, as rate reductions are most applicable to already marginal investments (i.e., without the reduction, the coal would not be recovered and no revenue would be generated).

The BLM will also consider ways to improve the transparency associated with the use of royalty rate reductions. As described in scoping comments from Taxpayers For Common Sense and others, the BLM could improve transparency in royalty rate reductions by providing public updates of the applications received and/or approved. This work has already been initiated through the implementation of BLM Instruction Memorandum No. 2014-156 and the associated justification that State Directors are required to provide to the Washington Office any application to ensure consistency in the BLM's review and decisions related to royalty rate reductions.¹⁹¹ These policies may be further modified through the PEIS and formalized as part of the proposed program reform alternatives.

4. **Rental Rate:** The BLM will consider increasing the rental rate associated with coal leases, which is currently set at a minimum \$3 per acre as established in 1979 (43 CFR, Subparts 3473.3-1). At a minimum, the BLM will consider increasing rental rates to reflect inflation since 1979. Given the small percentage of overall revenues that are generated by rental rates (see **Section 5.7.3**), it is not expected that this option will result in a substantial increase in return. This option may be implemented without rulemaking on an individual lease basis; however, rulemaking would be required to increase the regulatory minimum rate.
5. **Minimum Bonus Bid:** The BLM will consider raising the minimum bonus bid for coal leases that is currently set at \$100 per acre and was established in 1982. The minimum bonus bid represents the minimum value that can be received by the Treasury for a coal lease (43 CFR, Subpart 3422.1[c][2]). The minimum regulatory value is used only when other methods of estimating value (i.e., FMV) yield results that are less than the equivalent of \$100 per acre. At a minimum, the BLM will consider increasing the minimum bonus bid to reflect inflation since 1982. Accounting for inflation alone would increase the minimum bid to approximately \$250 per acre as pointed out by the Institute for Policy

¹⁹¹ BLM. 2014. BLM Instructional Memorandum 2014-156. Supplemental Guidance on Processing Royalty Rate Reduction Applications. September 26, 2014. Available at http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2014/IM_2014-156.html

Integrity in their paper entitled, “Illuminating the Hidden Costs of Coal.”¹⁹²

Raising the minimum bid is not likely to result in a substantial improvement in return since the minimum bonus bid has historically only been employed for leasing in North Dakota and Oklahoma. Minimum bids can vary regionally, and the BLM may also consider establishing minimum bonus bids by coal region taking into account regional economic, geologic, and engineering variables. An additional consideration may be to remove the \$100 bid floor and use the FMV process for setting the statutory minimum bid. The BLM will also consider the feasibility of and need for considering the option value associated with future information and/or changed conditions when establishing the minimum bonus bid.

6. **Alternative Leasing Mechanism:** The BLM will consider the use of alternative leasing mechanisms as a potential means to increase competition among bidders with the goal of improving return. Consideration will be given to inter-tract bidding and modified inter-tract bidding processes.

An inter-tract bidding requires mining companies that are interested in different tracts to compete among themselves for the right to produce on those tracts. As a general overview, the BLM would determine a leasing level for the region being covered before the lease sale. The BLM would then offer tracts for sale, or accept industry requests, in excess of the determined leasing level. The companies would all bid at once on the tracts they most prefer, and their bids would be ranked (e.g., based on \$/ton or \$/Btu). Tracts would then be subtracted from the leasing level in order until the leasing level is met. At this point, the remaining tracts would be rejected. The accepted tracts would be subjected to standard post-sale review to ensure that they achieved FMV.

Under a modified inter-tract bidding process, the BLM would determine a maximum tonnage or maximum number of Btus (or possibly carbon credits that would give the right to mine a volume of coal) to be leased for a region. All interested companies would bid among themselves for the right to produce coal. It could be conducted such that each bidder bids for a specified quantity of coal, and the highest bidders’ quantities are subtracted in order from the level. Alternately, bids could be accepted on a proportional basis, where each bidder bids in a price per ton or per Btu and wins a proportion of the total leasing level equivalent to the value of their bid. The former option consolidates production among the highest bidders, while the latter ensures that

¹⁹² Bureau of Labor Statistics. 2016. Consumer Price Index Inflation Calculator. Available at <http://data.bls.gov/cgi-bin/cpicalc.pl?costI=100.00&year1=1982&year2=2016>

every reasonable bidder receives some production. Once the lessees have received their production quantities, they would be free to allocate the increase on Federal lands of their choice subject to suitability review and NEPA analysis.

Both of these alternative bidding processes imply the need for a strategic plan that sets leasing level for a given region or nationally. Analysis will be needed to determine the potential for increased return associated with modified bidding systems in comparison to the administrative costs. If adopted, the design of this option would be critical. Any procedure to establish leasing levels is subject to uncertainty about future supply and demand conditions in energy markets. For example, the government should have the flexibility to adjust leasing levels to changing market conditions. The methods for how to determine a leasing cap will have to be established (see for example Reduce/Account for Greenhouse Gas Emissions #3). This option may also be considered in connection with the greenhouse gas issues to be discussed below.

It should be noted that the BLM leased coal based on regional plans that included the amount of coal to be leased starting in the late 1970s. This system was suspended due in part to low bidding activity. However, this system did not include the aforementioned alternative leasing mechanisms, and consideration of these options would not be limited to the specific processes and requirements previously used for regional leasing.

7. **Lease Bonding:** The BLM will assess whether current performance lease bonding procedures are sufficient to provide assurance of payment of obligations required under a lease. The BLM is not responsible for establishing bonds to cover environmental protection and reclamation requirements within a SMCRA permit, but rather is responsible for establishing bonds to protect the Federal government from losses in rentals and royalties (and in certain cases unpaid deferred bonus). The bonds are calculated using guidance established in BLM Manual Section 3474 and WO IM 86-145. At minimum, a bond must cover one-fifth of the bonus bid if there is any unpaid balance, as well as one year of advance rental and one-quarter year of royalties if the lease is in production. Bond reviews are currently conducted at least annually but may be increased based on circumstances, such as an anticipated increase/decrease in lease production. The BLM will accept a number of different types of lease bonds but does not accept self-bonds (43 CFR, Subpart 3471.1). This option may be implemented without rulemaking. However, rulemaking would be necessary to make the BLM regulations consistent with section 436 of the Energy Policy Act of 2005, 42 USC, Sections 15801 et seq, amending the Mineral Leasing Act at section 201(a)(4)(A).

8. **Royalty Policy Commission:** A number of commenters suggested that the BLM should immediately reconvene the Royalty Policy Committee, which was established by charter in 1995 under the authority of the Federal Advisory Committee Act. The Committee advised the Secretary on royalty management issues and other mineral-related policies, and also provided a forum for mineral lessees, operators, revenue payers, royalty recipients, government agencies, and interested public to express their views on those issues. The Committee charter required biennial review and could be renewed in 2-year increments by the Secretary as long as the Minerals Management Service required the expertise and advice of the Committee.

The Royalty Policy Committee was terminated on April 2, 2014, due to lack of participation. While the BLM does not believe there is a need to reconvene the Royalty Policy Committee in its previous form, as the Department of the Interior has in place various advisory bodies to address key minerals issues, it will consider the potential value in a policy commission that could assist with rate setting for the Federal coal program and will give that further consideration in the PEIS. Implementation of this option may require development of a charter pursuant to the Federal Advisory Committee Act and Secretarial action to convene a committee.

Reduce/Account for Greenhouse Gas Emissions

A related central objective to the BLM's reform effort for the Federal coal program is consideration of the effect of the program on, and alternatives for alignment with, US climate goals. Many stakeholders highlighted the tension between producing large quantities of Federal coal while pursuing policies to restrict global warming to a 2 degrees Celsius outcome, in line with the Paris Agreement (see **Section 5.4.6** for more information). The BLM received a number of suggestions for reform options that would help limit greenhouse gas emissions associated with Federal coal production. Future BLM analysis will evaluate the comparative effectiveness of these options at mitigating greenhouse gas emissions while still respecting the BLM's multiple use and fair return statutory mandates.

1. **Accounting for Carbon-Based Externalities Through a Royalty Rate Increase or Royalty Adder:** The BLM will consider options to account for the carbon-based environmental and social costs of coal production and use (e.g., climate change damages such as net agricultural productivity, human health, and property damages from increased flood risk). Two possible methods of adjusting the royalty to account for carbon-based externalities will be considered: an increase in the royalty rate (i.e., a percent increase) to account for carbon-based externalities and a carbon adder (or carbon fee) generally expressed as a \$/ton fee that would be in addition to the royalty rate. The advantages and drawbacks of a royalty rate increase versus an adder will be

explored in the PEIS. As has been suggested by commenters, the BLM could also theoretically account for carbon-based externalities through changes to rental rates or bonus bids. The BLM has determined that using royalty-based changes would directly connect impacts to the coal production and consumption—the activities that generate externalities—whereas rental rates are denominated in acres, and bonus bids are dependent on upfront estimates of total coal production.

Consideration will be given to the appropriateness of accounting for individual segments of, or the full lifecycle emissions of, CO₂ from coal. This includes the upstream carbon-related impacts associated with coal production, such as methane released during mining, and the midstream and downstream carbon-related impacts associated with transportation and combustion. For context, in their assessment of royalty rate adjustments to account for upstream externalities in coal production, the Institute for Policy Integrity estimated surface mine royalties would increase from 12.5 percent to 18.7 percent, and underground mine royalties would increase from 8 percent to 28.7 percent when accounting for the social cost of methane emissions from coal production.¹⁹³ Their analysis suggested a surface mine royalty of 82.6 percent when incorporating environmental and social externalities from coal transportation.¹⁹⁴ Royalty charge estimates increased higher still when the social cost of carbon related to coal combustion was internalized in other studies.

The BLM's consideration of the external costs associated with coal may, among others, rely on estimates for CO₂ and methane from the Federal Interagency Working Group on the Social Cost of Carbon.¹⁹⁵ The estimates of the social cost of carbon vary over time. Thus, in order to apply the social cost of carbon to Federal coal, analysis will be needed to link coal production and/or combustion to the social cost of carbon or social cost of methane specific to that year.

As this option results in higher prices for coal, it is likely to result in decreased Federal coal production and, therefore, greenhouse gas

¹⁹³ Foley, J. H. and P. Howard. 2016. Illuminating the Hidden Cost of Coal. New York University School of Law Institute of Policy Integrity. p. A-13. Available at http://policyintegrity.org/files/publications/Hidden_Costs_of_Coal.pdf

¹⁹⁴ These royalty percentages pertain to mine mouth prices, but constitute a much smaller percentage of the delivered price of coal that informs power plant's fuel purchase decisions.

¹⁹⁵ Interagency Working Group on Social Cost of Greenhouse Gases. 2016. Addendum to the Technical Support Document on Social Cost of Carbon for Regulatory Impact Analysis under Executive Order 12866: Application of the Methodology to Estimate the Social Cost of Methane and the Social Cost of Nitrous Oxide. Participation by the Council of Economic Advisers, Council on Environmental Quality, Department of Agriculture, Department of Commerce, Department of Energy, Department of the Interior, Department of Transportation, Department of the Treasury, Environmental Protection Agency, National Economic Council, Office of Management and Budget, Office of Science and Technology Policy. August 2016. Available at https://www.whitehouse.gov/sites/default/files/omb/inforeg/august_2016_sc_ch4_sc_n2o_addendum_final_8_26_16.pdf

emissions, but as a price mechanism it has no pre-determined CO₂ emissions or coal production outcomes, and levels can be expected to vary based on future market conditions and the availability of substitutes. Higher Federal coal prices may lead to increased non-Federal coal consumption that has similar lifecycle CO₂ emissions, which could partially offset some of the climate-related benefits to reduced Federal coal consumption. The environmental effectiveness of a royalty rate increase or adder would be largely contingent on the degree to which the substitute fuel sources are less carbon intensive (e.g., natural gas-fired generation or renewable generation) as opposed to similarly carbon intensive (e.g., non-Federal coal). The BLM will develop and use economic models to assess these substitution dynamics and the impact they have on the costs and benefits of any changes. Although there is less certainty around CO₂ emission under this option, in comparison to a carbon budget or other quantity-based option, a price-based mechanism would provide greater cost certainty to the coal industry.

Initial analysis conducted by Vulcan Philanthropy using the IPM model suggested a wide range of substitution rates of non-Federal coal for Federal coal, largely in the 0.2 to 0.7 range, depending on base case assumptions regarding the CPP and the percentage of the social cost of carbon incorporated into the royalty rate.¹⁹⁶ Two additional studies (one using the IPM model) project a small amount of substitution, while another study has posited that it may be more significant.^{197,198,199} The BLM will be conducting independent analysis similar to these as part of the PEIS. The BLM could also use modeling to test for economic efficiency by identifying at what level of royalty rate increase or adder the marginal benefit from avoided climate damages is greater than or equal to the marginal cost of that royalty adder.

Another consideration in the design of this option will be downstream emissions regulations. For instance, if existing downstream regulation at the point of combustion of coal is already addressing carbon

¹⁹⁶ A value of 0.2 would suggest that each decrease in a ton of Federal coal production would result in an increase of 0.2 tons of non-Federal coals. (Note: on average, non-Federal coals have higher Btu and CO₂ content per ton). See:

Vulcan Philanthropy. 2016. Federal Coal Leasing Reform Options: Effects on CO₂ Emissions and Energy Markets. Fairfax, Virginia: Vulcan Philanthropy/ICF International. January 2016. Available at <http://www.vulcan.com/MediaLibraries/Vulcan/Documents/Federal-Coal-Lease-Model-report-Jan2016.pdf>

¹⁹⁷ Gillingham, K., J. Bushnell, M. Fowlie, M. Greenstone, A. Krupnick, C. Kolstad, A. Morris, R. Schmalensee, and J. Stock. 2016. "Reforming the US Coal Leasing Program". *Science* 354(6316):1096-1098. Available at <http://science.sciencemag.org/content/354/6316/1096>

¹⁹⁸ Gerarden, T., W. S. Reeder, and J. Stock. 2016. Federal coal program reform, the Clean Power Plan, and the interaction of upstream and downstream climate policies. National Bureau of Economic Research Working Paper 22214. Cambridge, Massachusetts. Available at http://scholar.harvard.edu/files/stock/files/fedcoal_cpp_v9.pdf

¹⁹⁹ Krupnick, A., J. Darmstadter, N. Richardson, and K. McLaughlin. 2015. Putting a carbon charge on federal coal: legal and economic issues. Resources for the Future Discussion Paper 15-13. Washington, DC. Available at <http://www.rff.org/research/publications/putting-carbon-charge-federal-coal-legal-and-economic-issues>

externalities (partially or fully) through Federal or State regulatory initiatives, or if there is carbon capture and sequestration at the point of combustion, then those impacts could be netted out against any assumed social cost of carbon before converting into an adder as suggested by commenters. One such final downstream regulation is the CPP, which regulates CO₂ from existing power plants and, in effect, causes the internalization of a portion of the social cost of carbon. Because this downstream regulation partially captures the social cost of carbon, optimal upstream policies reflecting the social cost of carbon could be less than 100 percent of the full social cost of carbon to account for the CPP's effects.

With these substitution effects and downstream regulations in mind, some commenters have suggested only incorporating a percentage of the social cost of carbon into any royalty adjustments.^{200,201} However, the percentages used in these studies was illustrative and would require further refinement by the BLM. For example, research by Kenneth Gillingham and James Stock found that a carbon adder accounting for 20 percent of the social cost of carbon would amount to between \$15 and \$20 per ton for Powder River Basin coal.²⁰² Relative to current coal prices and the current surface mining royalty of 12.5 percent, this would equate to a royalty rate of roughly 160 percent to 210 percent.

The BLM may also consider as part of the PEIS opportunities for directing increased revenue streams to address climate adaptation and preparedness practices (e.g., develop and implement comprehensive climate adaptation plans, update stormwater infrastructure, and wildfire programs). Opportunities to direct revenue streams may require recommendations to Congress for statutory amendments.

2. **Compensatory Mitigation:** The BLM will consider adopting requirements for the use of compensatory mitigation to offset the greenhouse gas emissions and climate change impacts associated Federal coal production and use. According to the Department of the Interior's Departmental Manual chapter on implementing mitigation, compensatory mitigation is defined as means to compensate for remaining unavoidable impacts after all appropriate and practicable avoidance and minimization measures have been applied, by replacing or

²⁰⁰ Vulcan Philanthropy. 2016. Federal Coal Leasing Reform Options: Effects on CO₂ Emissions and Energy Markets. Fairfax, Virginia: Vulcan Philanthropy/ICF International. January 2016. Available at <http://www.vulcan.com/MediaLibraries/Vulcan/Documents/Federal-Coal-Lease-Model-report-Jan2016.pdf>

²⁰¹ Gerarden, T., W. S. Reeder, and J. Stock. 2016. Federal coal program reform, the Clean Power Plan, and the interaction of upstream and downstream climate policies. National Bureau of Economic Research Working Paper 22214. Cambridge, Massachusetts. Available at http://scholar.harvard.edu/files/stock/files/fedcoal_cpp_v9.pdf

²⁰² Gillingham, K. and J. Stock. 2016. Federal Minerals Leasing Reform and Climate Policy. Hamilton Project Policy Proposal 2016-07. December 8, 2016. Available at https://www.brookings.edu/wp-content/uploads/2016/12/es_20161208_federal_minerals_leasing_reform_and_climate_policy_pp.pdf

providing substitute resources or environments through the restoration, establishment, enhancement, or preservation of resources and their values, services, and functions. Impacts are authorized pursuant to a regulatory or resource management program that issues permits and licenses, or otherwise approves activities.²⁰³

Under this option, the BLM could receive compensation for unavoidable impacts associated with carbon-based externalities from lessees in the form of a fee paid at lease issuance based on the units of coal produced. Once the fee is paid, the BLM could assume responsibility for ensuring that the desired outcomes of compensatory mitigation are achieved. This approach has been used by the BLM in solar development and is proposed to be used in oil and gas development in the Northeastern National Petroleum Reserve in Alaska. Through the PEIS, the BLM will look at ways to calculate mitigation fees for unavoidable carbon-related impacts and ways to invest the fees collected. Alternately, under this option, the BLM could approve transactions proposed by lessees that would achieve the desired outcome of compensatory mitigation, but for which projects were carried out by private businesses, non-profits, or state or local agencies. This approach has been used under the Endangered Species Act and Clean Water Act as an efficient way to provide appropriate and measurable benefits to a resource that has been negatively affected through a proposed action.

Suggestions made through scoping comments on ways to spend compensatory mitigation funds include carbon offsets, carbon sequestration, climate adaption, and community resilience. As with option #1, Royalty Rate Accounting for Externalities, a compensatory mitigation fee would generate revenue. Careful consideration will be given to which carbon-related externalities should be mitigated for: upstream, or upstream and downstream. Another consideration in the design of this option will be existing regulations for downstream emissions. Like a royalty rate increase or royalty adder, compensatory mitigation may result in substitution from Federal to non-Federal coal and/or other energy sources. This substitution effect would need to be incorporated into BLM's analysis. In comparison to a royalty rate increase or carbon adder, this approach may offer the BLM the ability to direct how mitigation dollars are spent.

3. **Carbon Budget:** The BLM will consider establishing a carbon budget to guide Federal coal leasing in an effort to limit the amount of greenhouse gas emissions associated with Federal coal production. Under this quantity based option, the BLM would offer leases in

²⁰³ Department of the Interior. 2015. Departmental Manual Part 600 Public Land Policy, Chapter 6 Implementing Mitigation at the Landscape-scale, Section 6.4.C. October 2015. Available at <https://www.doi.gov/sites/doi.gov/files/uploads/TRS%20and%20Chapter%20FINAL.pdf>

accordance with an established carbon budget. A carbon budget would reflect the estimated annual volumes of CO₂ from Federal coal that align with US climate goals (see **Section 5.4.6**) and give consideration to the role of Federal coal in the emissions profile. Under this option, the BLM would identify the amount of Federal coal production and desired additional leasing over a specified time period that would be consistent with current national greenhouse gas emission reduction goals. Like a royalty rate increase or royalty adder, the carbon budget approach may result in substitution from Federal to non-Federal coal and/or other energy sources, so reducing federal leasing by a given amount may not lead to a commensurate reduction in greenhouse gas emissions. This substitution effect would need to be incorporated into BLM's analysis. In comparison to a royalty rate increase or royalty adder approach to addressing carbon-based externalities, a carbon budget approach would not link the climate cost of coal to consumption or provide cost certainty to industry.

In November 2016, the White House released its Mid-Century Strategy for Deep Decarbonization, which lays out the long-term pathways to achieve reductions in net economy-wide emissions of 80 percent below 2005 levels by 2050.²⁰⁴ This is consistent with the global ambition necessary to avoid most costly climate impacts and risks by meeting the long-term Paris Agreement aim of limiting the increase in the global average temperature to well below 2 degrees Celsius. Other studies have estimated that the US will have to reduce emissions an average of 83 percent below 2005 levels by 2050 (to do its part in limiting the concentration of greenhouse gases in the atmosphere to around 450 parts per million of CO₂).²⁰⁵

Studies acknowledge there are multiple potential pathways to a 2 degree compliance scenario, and there is not a single coal production level specific to these broader climate goals at a given point in time. The BLM may consider a carbon budget that is commensurate with Federal coal's appropriate contribution to meeting economy-wide greenhouse gas emission reduction targets. The BLM may also consider phasing in a budget over time to reduce the economic impact to coal producing regions. Furthermore, the BLM could analyze alternative carbon budgets that strive to align with other metrics such as EIA's projected demand for coal in its reference case scenario, or the anticipated amount of coal demand when social cost of methane and/or social cost of carbon dioxide are internalized into its price. Establishment of any carbon budget would have to consider the amount

²⁰⁴ The White House. 2016. US Mid-Century Strategy for Deep Decarbonization. November 2016. p.26. Available at https://www.whitehouse.gov/sites/default/files/docs/mid_century_strategy_report-final.pdf

²⁰⁵ See International Energy Agency. 2015. Energy and Climate Change. p.151. Available at [publication/WEO2015SpecialReportonEnergyandClimateChange.pdf](https://www.iea.org/publications/weo2015/SpecialReportonEnergyandClimateChange.pdf)

of coal already available under lease, production capacity, demand, and substitution effects.

Leasing per a carbon budget implies the need for a strategic leasing plan that guides how coal resources will be allocated overtime in a given region or nationally (see Improve Resource Protection & Management #2). It also would likely have to be coupled with a modified bidding system in order to allocate the coal per the budget as discussed under Improve Return #6.

4. **Methane Emissions:** The BLM will consider opportunities to address methane emissions associated with coal mining operations through the PEIS. This includes creating incentives for operators to capture waste mine methane (e.g., for free on-lease use, or capture, storage and sale to the market). The BLM initiated rulemaking through an Advanced Notice of Proposed Rulemaking for waste mine methane use or capture in April 2014 that considers the capture of waste mine methane, for use or sale, that would otherwise be vented.²⁰⁶ This proposed rulemaking asked for comments and suggestions that might assist the agency in the establishment of a program to capture, use, or destroy waste mine methane that is released into the mine environment and the atmosphere as a direct result of underground coal mining operations. As suggested in scoping comments, the BLM will consider incorporating some of these concepts into the PEIS.
5. **No New Leasing:** The BLM will fully analyze a no new leasing alternative as part of the PEIS as a means to reduce greenhouse gas emissions. Under this alternative, the BLM would issue no future leases for Federal coal with the exception of lease modifications within the defined acreage limitations; existing coal already under lease would not be impacted. Commenters have raised differing opinions on the BLM's legal authority with respect to ceasing all leasing of Federal coal. As part of the PEIS, the BLM will examine its statutory authority regarding implementing a no new leasing alternative and will consider alternative ways this option may be accomplished.

This alternative will require modeling and analysis of substitution, or "leakage," effects to determine net impacts on greenhouse gas emissions and climate change. For example, in the study entitled "How Would Phasing Out US Federal Leases for Fossil Fuel Extraction Affect CO₂ Emission and 2 Degree Celsius Goals?" the authors concluded that if the Federal government stopped all new leasing and did not renew non-producing leases, 3.1 QBtu of Federal coal would not be extracted that

²⁰⁶ BLM. 2014. Waste Mine Methane Capture, Use, Sale, or Destruction. Proposed Rule. *Federal Register* 79 (82): 23923. April 29, 2014. Available at <https://www.gpo.gov/fdsys/pkg/FR-2014-04-29/pdf/2014-09688.pdf>

otherwise would be between now and 2030.²⁰⁷ In terms of greenhouse gas emission reductions, assuming CPP implementation, the authors found that leasing restrictions would reduce CO₂ emissions in 2030 from coal by about 107 million metric tons of CO₂, but increased use of gas would increase emissions by about 36 million metric tons of CO₂, resulting in a net reduction of 71 million metric tons of CO₂. Supporting modeling showed that approximately 60 percent of the decreased Federal coal production would be made up by increased production in the Illinois Basin and (to a lesser extent) Appalachia. The resulting increased coal prices also led to some substitution by gas in domestic power systems, which also reduced emissions.

The BLM could consider including a conditional no new leasing option in which the BLM would issue new and renewed leases conditioned only upon a demonstration that the United States is on track to meet its economy-wide carbon reduction goals. If current emissions and projected emission levels did not suggest that the United States was on track to meet its emissions reduction goals, such as, for example, an 80 percent reduction from 2005 levels by 2050, then the BLM could withhold all new and renewed Federal leases on coal. If the United States were meeting or exceeding the economy-wide percent reduction goals for 2050, then new and renewed coal leasing could continue with no need for any climate-based royalties or budgets discussed in other options.

Improve Resource Protection and Management

The BLM will consider options aimed at improving resource protection and management, beyond the climate considerations described previously. These options will be analyzed to determine effectiveness at avoiding, minimizing, and/or mitigating impacts on resources of concern. This includes impacts on natural resources and communities as well as impacts related to public health.

- I. **Unsuitability Criteria:** In accordance with the BLM's coal leasing regulations (43 CFR, Subparts 3420.1-4[a]), coal cannot be leased until it has been evaluated in a comprehensive land use plan or land use analysis. As part of the planning process for coal resources, the BLM must identify areas acceptable for further consideration for leasing using four screening procedures (see **Section 5.8.1** for more information). Commenters expressed concern that the BLM does not consistently apply these screens at the land use plan level however. As part of the PEIS, the BLM will identify mechanisms to improve the application of these screens, which include the 20 defined unsuitability criteria, in

²⁰⁷ Erickson, P. and M. Lazarus. 2016. How would phasing out US federal leases for fossil fuel extraction affect CO₂ emissions and 2°C goals? The Stockholm Environmental Institute. 2016 Working Paper. Available at <https://www.sei-international.org/mediamanager/documents/Publications/Climate/SEI-WP-2016-02-US-fossilfuel-leases.pdf>

Resource Management Plans (43 CFR, Part 3461), such as requiring documentation and updating plans where this analysis is lacking.

As part of the PEIS, the BLM will also evaluate and modify as necessary the existing 20 criteria listed in the regulations that define areas as unsuitable for surface mining (43 CFR, Subpart 3461.5). For example, The Wilderness Society in their scoping comment letter suggested that the current unsuitability criteria be revised or expanded to include bat roosts and colonies, and important greater sage-grouse habitats, including priority habitat management areas (PHMA) and sagebrush focal areas (SFA).²⁰⁸ In their scoping comment letter, the Center for Biological Diversity provided specific suggested modification to individual criteria, such as increasing the buffer distance for public building or homes to 500 feet in Criterion 3 and including inventoried roadless areas in Criterion 4.²⁰⁹ The BLM will consider these suggestions as well as others as part of this option. Each of the unsuitability criteria contains specific information about exceptions or exemptions. As part of the PEIS, the BLM will also evaluate and modify as necessary the application of exceptions and exemptions to ensure adequate resource protection and consistency in application (43 CFR, Part 3461).

2. **Strategic Coal Leasing Plans:** The BLM will consider the development of strategic coal leasing plans as a means to guide Federal coal leasing for a given region or nationally. These plans would likely be step-downs to (or tiered to) an existing Resource Management Plan. However, the opportunity exists to include many of the same decisions and considerations in a Resource Management Plan. These strategic plans would be developed by the BLM on a reoccurring time frame. Many commenters have suggested a 5-year planning horizon for such plans, consistent with the Secretary's leasing program for offshore oil and gas. Commenters have also advocated for a regional approach to strategic planning in order to recognize the significant differences in geology, coal rank and quality, mining conditions, and socioeconomic conditions across various coal regions (see **Sections 5.4.2 and 5.7.1** for more information). As envisioned, these strategic plans could serve a variety of purposes that meet a number of policy objectives. Specific to the policy objective of improving resource protection and management, these plans could address resource management concerns at a landscape scale and potentially incorporate mitigation planning. These plans could recommend how much coal should be leased, in what

²⁰⁸ The Wilderness Society. 2016. Scoping comment letter on the Coal PEIS. July 28, 2016. See Volume 2, Appendix D.

²⁰⁹ Center for Biological Diversity. 2016. Scoping comment letter on the Coal PEIS. July 28, 2016. See Volume 2, Appendix D.

locations, and on what timeline to facilitate management of the Federal coal program under a carbon budget (Reduce/Account for Greenhouse Gas Emissions #3) and accommodate modified bidding procedures (Fair Return #6). These plans could also help streamline future leasing actions and provide a mechanism for future decisions to “tier” to or incorporate by reference (see Increase Lease Process Efficiency #1).

3. **Accounting for Additional Externalities:** The BLM will evaluate the impacts of increasing the royalty rate or including an adder for Federal coal to account for the environmental and social costs of coal production and use beyond carbon-based externalities. These externalities may include, but are not limited to, public health, safety, air quality, water quality, and wildlife impacts. Similar to Option #1, Royalty Rate Accounting for Externalities, an important consideration in the design of this option is what externalities at what point in the coal lifecycle to account for (i.e., upstream, or upstream and downstream). Coordination will be needed with many other agencies to avoid duplicate accounting for these externalities and to establish dollar values for impacts that are not easily quantified.

Inclusion of all of these values is likely to increase the cost of Federal coal substantially. For example, the study entitled “Full Accounting of the Life Cycle of Coal,” published by the New York Academy of Sciences, provided an estimate for all lifecycle externalities (upstream and downstream) related to Federal and non-Federal coal, including carbon-related externalities that ranged from \$175 to \$523 billion in 2008 dollars.²¹⁰ The authors point out that their review was limited by the omission of many environmental, community, mental health, and economic impacts that are not easily quantifiable or monetized. The BLM will develop a similar calculation for both upstream and downstream externalities specific to Federal coal production and use.

As with other options, the BLM will use modeling and analysis to determine the impact of coal price increases on Federal coal production. With increased costs, there is also the potential for switching to non-Federal coal or other energy sources, which could have a net effect on impacts and externalities associated with energy generation. Modeling and analysis will be needed to determine the projected level of substitution associated with various price increases on Federal coal. With these factors in mind, the BLM may consider applying only a percentage of the externality costs as a component of this option.

4. **Applicant Qualifications:** The BLM will consider strengthening the self-certification requirements for companies bidding on leases (43 CFR,

²¹⁰ Epstein, P. R. et al. 2011. “Full cost accounting for the life cycle of coal”. *Ann. N.Y. Acad. Sci.* 1219(2011):73-98. Available at http://www.chgeharvard.org/sites/default/files/epstein_full%20cost%20of%20coal.pdf

Subparts 3472.1-2[e][2]). As suggested in comments, requirements to be evaluated should include prohibiting leasing to self-bonded companies, ensuring sufficient financial resources, ensuring companies have not been cited for major violations of environmental regulations in connection with other operations, and verifying companies have been fulfilling reclamation obligations in connection with other operations. This option would require substantial coordination between the BLM, OSMRE, and the states to obtain this information on companies before they bid on leases.

5. **Environmental Protections:** The BLM will consider improving mechanisms that apply environmental protections in the form of stipulations (e.g., to reduce groundwater depletions, conduct breeding bird surveys, establish a monitoring program to assess mining impacts, and address any adverse impacts on surface resources from subsidence as a result of underground mining) to existing leases. The BLM currently has the authority to modify the terms and conditions of a lease at lease readjustment. This occurs upon the expiration of the initial 20-year lease period and any 10-year period thereafter (30 USC, Subsection 207[a]; 43 CFR, Subpart 3451.1[a][1]). The BLM also has the authority to apply additional stipulations to existing leases if the leases are modified and additional acreage is added (43 CFR, Subpart 3432.3).
6. **Regional Mitigation Strategies:** Commenters suggested that the BLM develop regional mitigation strategies for existing and new coal development to address environmental and public health impacts. Regional mitigation strategies identify and facilitate mitigation opportunities at the regional scale, allowing for pre-planning for mitigation opportunities. Guidance on preparing regional mitigation strategies is included in BLM Manual Section 1794.²¹¹ Where the BLM anticipates large-scale development, regional mitigation strategies can be an effective tool to increase permitting efficiency and financial predictability for applicants by studying potential mitigation needs and opportunities on both BLM and non-BLM-administered lands, which can help to inform subsequent permits and authorizations. Regional mitigation strategies can also enhance the ability of Federal and state governments, tribes, nongovernmental organizations, and resource users to invest in larger-scale mitigation efforts through prioritization of investments and pooling of financial resources. The BLM will consider its existing authority with respect to environmental and public health impacts and determine if the concept of regional mitigation strategies could be applied to the Federal coal program to further the goal of improving resource protection and management. This option will

²¹¹ BLM 2013. BLM Manual Section 1794. Available at https://www.blm.gov/sites/blm.gov/files/uploads/BLM_MS-1794%20Mitigation%20FINAL.docx

require close coordination with the OSMRE to identify appropriate mitigation actions.

7. **Best Management Practices:** The BLM will consider the use of best management practices to meet resource protection goals for the Federal coal program. Best management practices are state-of-the-art mitigation measures to be applied on a site-specific basis to reduce, prevent, or avoid adverse environmental or social impacts. The BLM often applies best management practices in the context of oil and gas development and will evaluate the use of best management practices to meet resource protection goals in the coal leasing and management context. These best management practices may be incorporated as stipulations in individual new leases as appropriate. Best management practices would serve a similar purpose as design features, which were suggested by some commenters as an option to protect resources.

Increase Lease Process Efficiency

The BLM will consider options that are intended to improve the lease process itself. A number of commenters expressed concern over the time it takes to obtain a Federal coal lease and what they perceive as redundancies in the process. These options will be analyzed to determine the degree to which the BLM can increase the efficiency of the lease process while maintaining the integrity and intent.

1. **Strategic Coal Leasing Plans:** As discussed under the policy objective Improve Resource Protection and Management, the BLM will consider the development of strategic coal leasing plans as a means to guide Federal coal leasing for a given region or nationally. These plans would likely be step-downs to (or tiered to) an existing Resource Management Plan. However, the opportunity exists to include many of the same decisions and considerations in a Resource Management Plan. These strategic plans would be developed by the BLM on a reoccurring time frame. Many commenters have suggested a 5-year planning horizon for such plans, consistent with the Secretary's leasing program for offshore oil and gas. Commenters have also advocated for a regional approach to strategic planning in order to recognize the significant differences in geology, coal rank and quality, mining conditions, and socioeconomic conditions across various coal regions (see **Sections 5.4.2** and **5.7.1** for more information). As envisioned, these strategic plans could serve a variety of purposes that meet a number of policy objectives. Specific to the policy objective of increasing lease process efficiency, these plans could be designed to help streamline future leasing actions, providing a mechanism for future decisions to "tier" to or incorporate by reference addressing regional issues that tend to be cumulative in nature, such as air quality and climate change. In addition, these plans could address resource management concerns at a

landscape scale and potentially incorporate mitigation planning (see Improve Resource Protection and Management #2). These plans could recommend how much coal should be leased, in what locations, and on what timeline to facilitate management of the Federal coal program under a carbon budget (Reduce/Account for Greenhouse Gas Emissions #3) and accommodate modified bidding procedures (Fair Return #6).

2. **Pre-Application Process:** The BLM will consider creating a pre-application process in which lease applicants would be required to complete some work prior to the BLM accepting an application (e.g., Qualified Surface Owner consent/identification). This would be intended to help reduce time delays that take place after an application is received.
3. **Standardized Lease Application Form:** The BLM will consider establishing a standardized lease application form to include minimum requirements found in 43 CFR, Subparts 3425.1-7 and other requirements, as determined appropriate. The BLM will also consider developing an electronic platform for the submission of applications. This could improve the consistency and efficiency of the application process.
4. **Single Fair Market Value Team:** The BLM will consider establishing a single team nationwide that conducts the FMV calculations for all offices. This is expected to bring a higher level of consistency and efficiency to the process. This work is currently carried out by a mix of field and state office personnel. This team would prepare the geologic, engineering, economic, and valuation reports to support the estimate of FMV associated with a coal tract proposed for leasing.

Chapter 2 of the BLM's Coal Evaluation Handbook, H-3073-1 describes evaluation team members and their roles in the estimate of FMV. Secretarial Order 3300 established that the Department of the Interior, OVS has the sole responsibility for all real estate valuation functions of the BLM. Based on recent GAO/OIG recommendations, the BLM and OVS revised the Coal Evaluation Handbook (H-3073-1) to establish the procedures under which OVS reviews the BLM's FMV estimates to assure compliance with all applicable guidance and professional standards.

5. **Eliminating Redundant Processes:** The BLM will work with other agencies to evaluate means for eliminating identified overlapping requirements and redundant processes associated with the Federal coal leasing and permitting process. There are existing interagency memorandums of understanding that outline the roles and responsibilities of the various agencies involved in Federal coal activities. The OSMRE is the Federal agency with the primary responsibility to

administer programs that regulate surface coal mining and reclamation operations in accordance with SMCRA and with oversight over state RAs. The state RAs in primacy states have primary responsibility to administer and regulate surface coal mining operations within their jurisdiction subject to the OSMRE's oversight. The OSMRE also is responsible for providing the Mineral Leasing Act mining plan recommendations to the Assistant Secretary of the Interior, Land and Minerals Management. The Forest Service also has jurisdictional responsibilities (i.e., they must provide consent or concurrence to the BLM) when coal is proposed for leasing or exploration on National Forest System lands. Both Federal agencies, as well as state and tribal RAs, may participate as cooperating agencies on the BLM's NEPA analysis for a given coal lease and use that analysis (e.g., through tiering or incorporation by reference) to prepare a decision for actions under their jurisdiction.

6. **Improve Transparency:** The BLM will continue to seek opportunities to improve transparency associated with the Federal coal leasing process. This work has already been initiated through the development of an Instruction Memorandum expected to be finalized in early calendar year 2017. In accordance with that Instruction Memorandum, state offices are directed to maintain on their publicly accessible websites information regarding:
- a. Lease and lease modification applications covered by one of the exceptions to the Pause
 - b. Coal leasing information including the number of coal leases that are currently in effect; the total acreage under lease; the number of sales held in each fiscal year, including both successful and unsuccessful lease sales; and noncompetitive lease modifications
 - c. Exploration licenses and licensing applications
 - d. Previously granted and pending royalty rate reduction applications.

These policies may be further modified through the PEIS and formalized as part of the proposed program reform. These options may be implemented without rulemaking.

6.2.2 Development of Alternatives

The BLM will conduct an evaluation of the options in **Table 6-1**. Once the benefits, impacts, and overall feasibility of the various options are understood, the BLM will be better equipped to blend the options into reform alternatives for the Federal coal program and consider their combined impacts. Program alternatives will be analyzed in a comparative way in the Draft PEIS to determine

their overall impact on the energy markets, energy prices, socioeconomics, and the environment as described in more detail in **Section 6.4**.

The BLM believes that there are a number of the options that represent more modest reforms that could be combined with almost any combined option package or future alternative, or implemented as standalone actions. These options represent beneficial program modernization activities and good government practices.

For fair return, these include FMV determination process changes aimed at transparency and consistency, limiting the use of royalty rate reductions and improving the transparency associated with the use of royalty rate reductions, rental rate adjustments to reflect inflation, minimum bonus bid adjustments to reflect inflation, and evaluation of current performance bonding amounts. For greenhouse gas emissions, this includes creating incentives for methane capture.

For resource protection and management, this includes strengthening requirements for companies bidding on leases, all of which would require coordination with the OSMRE. The requirements include prohibiting leasing to self-bonded companies, ensuring sufficient financial resources, ensuring companies have not been cited for major violations of environmental regulations in connection with other operations, and verifying companies have been fulfilling reclamation obligations in connection with other operations. It also includes developing best management practices for resource protection and improving planning to avoid land use conflicts, such as through the modification and improved application of unsuitability criteria or through the development of strategic coal leasing plans. For lease process efficiency, these include standardizing lease application forms, developing an electronic platform for the submission of applications, working with other agencies to evaluate means for eliminating redundant processes, and improving transparency.

At the Secretary's direction in connection with Order 3338, the BLM is in the process of developing guidance to implement several of these improvements. Additional reforms may be implemented prior to completion of the Final PEIS if further analysis supports taking action on a more expedited timeframe.

To demonstrate how the various options could be combined to develop alternatives in the PEIS, the BLM sets out three possible option combination packages. Because each option presents its own range of analytic issues and because that complexity may be compounded by interactions among the reform options if they are implemented in combination, additional analysis is needed before these or other combinations of options can be included as alternatives for consideration in the PEIS. The Draft PEIS also will analyze a "no action" and a "no leasing" alternative.

Possible Option Combination Package #1

1. Fair Return

Increase the royalty rate to reflect the fair return for coal produced on Federal land. The BLM would identify the most appropriate metric and corresponding royalty rate for Federal coal, reflecting on analysis already conducted by other groups such as the CEA. The BLM would also assess the net impact on revenues from such changes, including any potential reduction in bonus bids and production.

2. Climate Change/Resource Protection

Require compensatory mitigation for Federal coal leases. The BLM would require lessees to carry out or fund activities that proportionally offset climate-related impacts, including through investment in a fund managed by an entity that takes on the liability to proportionally offset those greenhouse gas emissions and climate-related impacts. Contribution to the fund would be tied to the unit of coal produced. Funds could be used for activities including, but not limited to, carbon offsets, carbon sequestration, climate adaptation, and community resilience.

3. Leasing Process

- a. *Develop strategic leasing plans and utilize modified inter-tract bidding on a \$/ton or \$/Btu basis.* Strategic leasing plans would be developed based on regular reviews of projected domestic coal demand (e.g., over a 5-year window) and the role of Federal coal resources in meeting domestic energy needs. These plans would set lease sales on a regular schedule to accommodate a modified inter-tract bidding system. The BLM would determine a maximum tonnage of coal or maximum number of Btus to be leased consistent with projected demands. Under a modified inter-tract leasing process, all interested companies would bid among themselves for the right to produce a specified quantity of coal in the location of their choice, assuming it is suitable for mining and consistent with the approved land use plan and strategic leasing plan. To the extent that auctions become more competitive through the use of modified inter-tract bidding, resulting in increased bonus bids, the need for a higher royalty rate could be revisited on a periodic basis.
- b. *Develop regional mitigation strategies.* Regional mitigation strategies would be developed by the BLM to identify and facilitate compensatory mitigation opportunities at the regional scale, allowing for pre-planning for, and advanced investment in, mitigation opportunities.

4. Community Assistance

- a. *Explore use of compensatory mitigation funds to invest in affected communities experiencing reduced coal production.* The BLM would seek to use compensatory mitigation funds to invest in economic diversification and workforce development efforts.
- b. *Direct a portion of Federal coal revenues to community assistance.* The BLM would seek to secure Congressional authorization to direct a portion of increased Federal coal revenues toward investments in impacted communities that support economic diversification, job training, mine reclamation, and other community priorities.

Possible Option Combination Package #2

I. Fair Return

Increase the royalty rate to reflect the fair return for coal produced on Federal land. The BLM would identify the most appropriate metric and corresponding royalty rate for Federal coal reflecting on analysis already conducted by other groups. Because a carbon-based royalty adder, as described under 2, could be instituted in combination with or independent of a potential royalty rate increase based on fair return principles, the BLM will analyze the effects of such changes both individually and cumulatively.

2. Climate Change/Resource Protection

Apply a royalty adder to royalty rates to account for carbon-based environmental and societal costs of coal production and use (\$/ton of coal). A royalty adder would tie climate costs directly to production/consumption. As a price mechanism, a royalty adder would provide price certainty to mining operators and downstream purchasers. A royalty adder would apply only to new and renewed leases and, therefore, would be necessarily phased in over time. The BLM would conduct analysis to identify the most appropriate royalty adder taking into account downstream regulations and substitution effects, and reflecting on analysis already completed by other groups. The BLM would also assess the net impact on revenues from such changes, including any potential reduction in bonus bids and production.

3. Leasing Process

Develop strategic leasing plans and utilize modified inter-tract bidding on a \$/ton or \$/Btu basis. Strategic leasing plans would be developed based on regular reviews of projected Federal coal demand (e.g., over a 5-year window) and could serve a variety of purposes that meet a number of policy objectives, including addressing resource management concerns at a landscape level and helping to streamline future leasing actions. These plans would set lease sales on a regular

schedule to accommodate a modified inter-tract bidding system. The BLM would determine a maximum tonnage of coal or maximum number of Btus to be leased consistent with projected demands. Under a modified inter-tract leasing process, all interested companies would bid among themselves for the right to produce a specified quantity of coal in the location of their choice, assuming it is suitable for mining and consistent with the approved land use plan and strategic leasing plan. To the extent that auctions become more competitive through the use of modified inter-tract bidding, resulting in increased bonus bids, the need for a higher royalty rate could be revisited on a periodic basis.

4. Community Assistance

- a. *Direct a portion of Federal coal revenues to community assistance.* The BLM would seek to secure Congressional authorization to direct a portion of increased Federal coal revenues toward investments in impacted communities that support economic diversification, job training, mine reclamation, and other community priorities.
- b. *The states' portion of increased revenues would be available to invest in impacted communities experiencing reduced coal production.* The additional revenues generated by a royalty rate adder would be split with states consistent with current law and could be used by states to support economic diversification efforts in communities and related activities.

Possible Option Combination Package #3

1. Fair Return

Increase the royalty rate to reflect the fair return for coal produced on Federal land. The BLM would identify the most appropriate metric and corresponding royalty rate for Federal coal, reflecting on analysis already conducted by other groups. The BLM would also assess the net impact on revenues from such changes, including any potential reduction in bonus bids and production.

2. Climate Change/Resource Protection

- a. *Periodically evaluate and ensure that coal production and associated life-cycle emissions are consistent with the need to reduce net domestic greenhouse gas emissions 80 percent below 2005 levels by 2050.* This tracks to a straight-line reduction from the US 2025 Intended Nationally Determined Contribution (INDC),²¹² and it is also consistent with the long-term pathway set forth in the US Mid-

²¹² Actions described by the UNFCCC in December 2015 to achieve the long-term goals of the Paris Agreement: to hold the increase in global average temperature to well below 2°C, to pursue efforts to limit the increase to 1.5°C, and to achieve net zero emissions in the second half of this century.

Century Strategy for Deep Decarbonization.²¹³ *The BLM would limit the amount of Federal coal leased at a given time based on a carbon budget. The Federal coal leasing levels would be premised on a carbon budget that is commensurate with Federal coal's appropriate contribution to meeting economy-wide greenhouse gas emission reduction targets. In other words, the total amount of coal offered and made accessible under Federal leases would contain lifecycle CO₂ emission levels that are less than or equal to the anticipated emissions from Federal coal under an INDC strategy.*²¹⁴ The BLM would also need to evaluate the effectiveness of applying INDC-based limits to Federal coal leasing if and when no similar limitations are applied to substitute non-Federal energy sources to address concerns over emissions shifting to non-Federal coal sources. This potential shifting to non-Federal coal sources could reduce the environmental benefit of such limits (i.e., due to emissions leakage).

- b. *Develop strategic leasing plans.* Strategic leasing plans would incorporate the carbon budget and set lease sales on a regular schedule to accommodate a modified bidding system (see 3a below). These strategic plans could help meet a variety of policy objectives, including addressing resource management concerns at a landscape level and helping to streamline future leasing actions.

3. Leasing Process

Use modified inter-tract bidding on a \$/ton or \$/Btu basis. The BLM would determine a maximum tonnage of coal or carbon or maximum number of Btus to be leased consistent with the defined carbon budget. Under a modified inter-tract leasing process, all interested companies would bid among themselves for the right to produce a specified quantity of coal in the location of their choice, assuming it is suitable for mining and consistent with the approved land use plan and strategic leasing plan. To the extent that auctions become more competitive through the use of modified inter-tract bidding, resulting in increased bonus bids, the need for a higher royalty rate could be revisited on a periodic basis.

4. Community Assistance

Direct a portion of Federal coal revenues to investments in communities experiencing economic impacts from reduced coal production. The BLM would seek to secure Congressional authorization to direct a

²¹³ The White House. 2016. US Mid-Century Strategy for Deep Decarbonization. November 2016. Available at https://www.whitehouse.gov/sites/default/files/docs/mid_century_strategy_report-final.pdf

²¹⁴ One way to implement this approach would be for the BLM to use an economy-wide model to estimate least cost compliance strategies for meeting INDCs. The BLM could use the model output to derive anticipated Federal coal consumption levels over a 20-year period, and then use that level, in conjunction with reserves already under lease, as a limit on the amount of reserves that are leased.

portion of increased Federal coal revenues toward investments in communities that support economic diversification, job training, mine reclamation, and other community priorities.

No Action Alternative

Under the no action alternative, the Federal coal program would continue to be administered in the manner in which it is administered currently. Leasing would be conducted through LBA. The current means of determining FMV, royalty rate reductions, minimum bonus bids, and rental rates would remain unchanged. The no action alternative would not address concerns raised by numerous parties about the Federal coal program, including concerns raised by the GAO, the OIG, members of Congress, interested stakeholders, and the public.

No Leasing Alternative

Under a no leasing alternative, the BLM would issue no new leases for Federal coal except for lease modifications within the defined acreage limitations (960 acres or less²¹⁵). Existing coal already under lease would not be impacted. Administration of existing leases would remain unchanged, including existing royalty rates and rental rates. The BLM may also consider combining the no new leasing alternative with other reform options aimed at modernizing the administration of existing leases as part of separate reform packages or alternatives.

6.2.3 Options Not Carried Forward for Further Analysis

The following section includes a summary of additional reform options suggested through the scoping process that the BLM is proposing not to carry forward for analysis in the PEIS. A rationale has been provided as appropriate. Many of these options are already undertaken by the BLM, are under the authority of another agency, or would not meet the policy objectives outlined in BLM's Need for Federal Action in **Section 6.1.1**.

Fair Return

Comments were submitted suggesting that the FMV calculation for Federal coal should be redefined to account for environmental and social costs of coal production and use. While the BLM agrees that consideration should be given to such costs, the agency does not believe the FMV is the appropriate place for this to be applied. FMV is defined at 43 CFR, Subparts 3400.0-5(n) as the "amount in cash, or on terms reasonably equivalent to cash, for which in all probability the coal deposit would be sold or leased by a knowledgeable owner willing but not obligated to sell or lease to a knowledgeable purchaser who desires but is not obligated to buy or lease." The Coal Evaluation Handbook (H-3073-1) describes FMV as a determination made by reference to a competitive market rather than to personal or inherent value of the property. Therefore, the BLM believes accounting for the social and environmental costs of coal to be

²¹⁵As defined in the Energy Policy Act of 2005 Section 432

produced in the future would be too remote or speculative to include in the FMV calculation. Alternatively, the BLM is proposing to consider the environmental and social costs of coal production and use as part of an increased royalty rate or adder (see Reduce/Account for Greenhouse Gas Emissions #1 and Improve Resource Protection and Management #3).

Other comments made with respect to the FMV calculation asked the BLM to consider non-Federal coal, exports, and extraction costs in their calculation methods. The BLM's calculation of FMV already takes these factors into consideration. Chapter 3 of H-3073-I discusses both export coal market data and lease-specific comparable sales data requirements, including information about private coal property market transactions.

A number of commenters suggested that the BLM should subject the FMV calculation to public hearing(s) ahead of the competitive leasing process. The BLM's FMV process currently includes the opportunity for public input as part of the information gathering process that goes into the FMV calculation (see **Section 5.8.2**). Because the Mineral Leasing Act requires competitive leasing, the BLM believes that opening up the FMV estimate to the public would undermine the bidding process, especially on those tracts where only one bid is received.

Some commenters requested that the BLM maintain the existing royalty rates and consider reducing the existing royalty rates as a means to increase production and, therefore, improve return. The BLM will consider no change in the existing royalty rates as part of the no action alternative. An option to reduce the royalty rate is not proposed to be carried forward for further analysis in the PEIS, however, as royalty rates are already at their statutory defined floor (43 CFR, Subparts 3473.3-2). The BLM has determined that this option would not meet the object of improving fair return to the American taxpayer.

As described in **Section 5.4.6, Main Drivers**, the demand for coal is driven by a variety of complex market and regulatory factors. A simple reduction in the current royalty rate on coal would not necessarily lead to increased demand levels that offset the revenue loss. Therefore, this may have the impact of decreasing return to the Federal taxpayer. Moreover, while more analysis is needed, most preliminary qualitative and quantitative assessments suggest increasing, not decreasing, royalty rates is the appropriate direction to evaluate to enhance FMV and revenues. This is supported by the market projections for coal (see **Section 5.5**).

A number of commenters suggested alternative ways that the value of coal production, on which royalties are assessed, should be calculated. Options included basing the value of coal production on the final sale price to a power plant or other end user or applicable market price; basing the value of coal production on the average price of nearby regional coal, the price of nationwide

coal, or the price of a substitute in the electricity dispatch order; basing the value of coal production on sales prices of coal with similar characteristics from both Federal and non-Federal lands; and directly valuing coal production using an appraisal approach rather than basing the value on individual sales transactions.

Other comments suggested capping transportation deductions, establishing cost of allowable transportation deductions based on the most efficient means of transport, or establishing the cost of allowable transportation deductions based on observable indices of coal transportation costs per rail mile, rather than self-reported cost numbers. Comments were also raised regarding the elimination of coal washing deductions, the practice of selling to affiliates at artificially low prices, and take or pay contracts. The BLM has no authority over the valuation of coal production for purposes of royalty payments; this is the ONRR's responsibility (see **Section 5.2**). The ONRR has recently completed rulemaking on Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform (30 CFR, Parts 1202 and 1206), which will become effective January 1, 2017.

In terms of bonus bids, commenters suggested that the BLM should base bonus bids on the amount of recoverable coal rather than the amount of coal reserves. This is already the case, as the BLM bases the pre-sale FMV on recoverable coal estimates. This will be considered as part of the no action alternative. In order to provide additional clarity, the BLM will consider revising guidance to ensure consistency among states on how to apply recoverable coal estimates.

Commenters also suggested that the BLM should abandon bonus bids for maintenance tracts, and instead employ an adjusted revenue-neutral royalty schedule for those tracts. The BLM experimented with this approach in the past and found that it did not meet the goals of obtaining fair return for the coal resource. If the coal were never produced, there would be no benefit associated with issuing a maintenance tract, whereas a bonus bid ensures a return to the public. Therefore, this suggestion would be ineffective, as it does not meet the purpose and need of the PEIS.

Commenters suggested that the BLM incorporate into coal leases the authority to adjust rental and royalty fees over time. The BLM currently has the authority to modify the terms and conditions of a lease, including rental fees and royalty rates at lease readjustment (43 CFR, Part 3451). This occurs at the end of the 20-year primary term and then every 10 years for the life of the lease (43 CFR, Part 3451). It should also be noted that royalty rates are assessed on the value of coal production, which is determined by the ONRR at the time of the first arm's-length sale (30 CFR, Part 1206).

Commenters also suggested the BLM should cancel existing leases that are not producing. While the BLM is not authorized to cancel an existing lease specifically for "not producing," it can cancel an existing lease for not meeting

the terms and conditions of the lease, which include diligent development (43 CFR, Subparts 3452.2-1). Therefore enforcing diligent development of existing leases will be considered as part of the no action alternative.

Commenters requested that the BLM modify the time frame over which bonus bid payments are made (i.e., over a longer or shorter period of time). This option would not impact the overall value of the bonus bid. The BLM has decided not to carry this option forward for further analysis, because it does not meet any of the objectives stated as part of the purpose and need of the PEIS.

Commenters also suggested that the BLM consider delaying collection of bonus bids until mining begins on the leases and allow a royalty credit for the capital costs to establish a mining operation to increase competition for bids. The BLM has decided not to carry this option forward for further analysis, because it does not meet any of the policy objectives stated as part of the purpose and need of the PEIS.

Commenters suggested that the BLM should ban companies from selling coal to subsidiaries to depress rates (i.e., captive transactions). This issue is outside of the BLM's authority, but is addressed by the ONRR in the methods by which it values coal production. The ONRR has procedures in place to ensure proper valuation of coal production sold to affiliates or subsidiaries under non-arm's-length transactions. Effective January 1, 2017, the ONRR amended their regulations governing valuation, for royalty purposes, of oil and gas produced from Federal onshore and offshore leases and coal produced from Federal and Indian leases (81 FR 43337).

Commenters asked the BLM to consider how the leasing of smaller tracts might better ensure the maximum economic recovery of coal (e.g., reduce market uncertainties and ensure a higher fair market valuation associated with shortened duration of mining operations). Other commenters suggested that the BLM only lease 10 years or less of coal reserves under a single lease. The BLM already considers the size of the tract and potential amount of reserves as part of the leasing process and has the ability to reconfigure tracts prior to lease sale. Tract reconfiguration is done to increase competition when another existing mine is nearby and to carve out areas not suitable for leasing (e.g., raptor nests and cultural sites). The BLM also may reconfigure a LBA tract to ensure that Federal coal reserves are not bypassed and the amount of reserves is reasonable based on the annual production at that mine. This will be considered as part of the no action alternative.

Commenters suggested two ways to potentially reduce costs with respect to the coal leasing process. These included waiving the BLM cost recovery imposed during the Federal coal leasing process and not charging lease applicants for the third-party NEPA associated with NEPA actions. These suggestions run counter to the objective of orderly administration of coal on Federal lands. Without

cost recovery, the BLM would have to allocate appropriated budget dollars from other priorities for processing coal lease applications. The BLM would also have to identify staff to undertake NEPA analyses for leasing actions or allocate budget dollars to hire third-party NEPA consultants to undertake this work. Given resource limitations, this would have a negative impact on the efficiency of the process, which is already the subject of criticism for the length of time it takes to complete.

Reduce/Account for Greenhouse Gas Emissions

Regarding Social Cost of Carbon, commenters recommend the inclusion of a net “social benefit” standard for coal that includes both the social cost of carbon and the positive economic benefits of coal jobs and revenue, schools, infrastructure, and reliable, low-cost electricity. While the BLM agrees that there are benefits associated with the production and use of Federal coal, many of these “benefits” are captured in the market value of coal. Additional nonmarket benefits can be assessed qualitatively. While not necessarily in the form requested by commenters, the PEIS will include consideration of both the market and nonmarket values associated with coal (see **Section 5.7**).

Some commenters suggested the BLM should not allow leasing of Federal coal if it is intended to be used for export. It should be noted that exports have historically and currently make up a very small part of Federal coal market (see **Section 5.4.6**). Opportunities for exports are limited by the availability of export terminals, transportation costs, and global coal prices. Because the BLM has very limited, if any, control over where Federal coal is ultimately consumed (i.e., coal may change hands multiple times before its final end use), this option will not be carried forward for further analysis. The BLM does however identify coal export market information during the preparation of the economic evaluation report supporting BLM’s FMV estimate (Chapter 3 of H-3073-1), and will consider it in the context of evaluating strategic leasing plans that could be developed based on regular reviews of projected domestic coal demand (e.g., over a 5-year window) and the role of Federal coal resources in meeting domestic energy needs.

A number of commenters emphasized the need to require carbon capture and sequestration for coal energy generators, and to invest in carbon capture and storage technologies and clean coal technologies. The BLM does not have the authority to require any action of coal consumers or dollars to invest in new technologies. While not carried forward as an option in the PEIS, it is worth noting there are a number of Federal programs in place that target these topics. For example, the Department of Energy’s Office of Fossil Energy manages a Clean Coal Research and Development program that is focused on developing and demonstrating advanced power generation and carbon capture, utilization and storage technologies for existing facilities and new fossil-fueled power plants by increasing overall system efficiencies and reducing capital costs. Their Carbon Capture, Utilization and Storage program advances safe, cost effective, capture

and permanent geologic storage and/or use of CO₂ and their Advanced Energy Systems program focuses on improving the efficiency of coal-based power systems, enabling affordable CO₂ capture, increasing plant availability, and maintaining the highest environmental standards.²¹⁶

Some commenters stated support for investing in renewable energy programs over coal mining operations, due to the decreased environmental impact and efforts to mitigate climate change. The promotion of renewable energy programs over coal leasing is outside of the scope of the PEIS. The BLM will however consider as part of the PEIS analysis the impacts of coal program reform alternatives on the larger power sector including other energy sources such as wind and solar energy generation (see **Section 6.4**).

Improve Resource Protection and Management

Some commenters suggested that the BLM should modify regulations to require the application of unsuitability criteria only at the time an applicant submits an application for leasing (versus at the Resource Management Plan stage). The BLM believes that there are benefits to applying the unsuitability criteria at both stages in the process, and the regulations allow for consideration at both levels (43 CFR 3461.3-1). The application of unsuitability criteria at the Resource Management Plan level allows for landscape-scale land use allocation decisions to be made and areas to be identified as unsuitable for coal leasing. Once an application has been submitted for an area allocated as suitable for coal leasing, the BLM has the obligation to take a second look at the area under consideration to determine if any of the unsuitability criteria are triggered based on site-specific information.

Commenters suggested that the BLM should provide clarification around “contemporaneous” reclamation and develop rules that require diligent reclamation. Commenters also submitted comments suggesting that the BLM evaluate alternatives for funding reclamation and post-closure activities. While the BLM understands the importance of timely, successful reclamation, the BLM does not have authority over the reclamation process associated with Federal coal production. This authority is held by OSMRE (see **Section 5.2**). As appropriate, the BLM will work with OSMRE to improve reclamation planning and implementation opportunities for Federal coal.

A larger number of commenters expressed concern about the practice of self-bonding for reclamation requirements and requested amendment to the regulations at 30 CFR 800.23 and any other regulations, as appropriate, to prohibit self-bonding whenever publicly owned coal is permitted to be mined. This is particularly troublesome with the recent rash of bankruptcies among many large coal companies. While the BLM is aware of the issues associated

²¹⁶ Department of Energy, Office of Fossil Energy Clean Coal Research Program. 2016. Clean Coal Research. Available at <https://energy.gov/fe/science-innovation/clean-coal-research>

with self-bonding for reclamation, the BLM does not have the authority over bonding for reclamation. This authority is held by OSMRE (see **Section 5.2**) and primacy states. OSMRE recently announced its intention to initiate rulemaking on the practice of self-bonding.²¹⁷ As appropriate, the BLM will work with OSMRE to improve self-bonding regulations.

Increase Lease Process Efficiency

Commenters suggested consolidating the Federal coal leasing and permitting process into the hands of fewer agencies. SMCRA prohibits this (30 USC 1211). There are inherent differences in the duties of OSMRE and the BLM. To combine the agencies would require amending the SMCRA. Further, Department of the Interior experience has shown that it is best to keep leasing and environmental enforcement separate. For example, the Minerals Management Service, which previously managed the nation's natural gas, oil, and other mineral resources on the outer continental shelf split into the BOEM, the Bureau of Safety and Environmental Enforcement (BSEE), and the Office of Natural Resources Revenue. In lieu of consolidation, the BLM is proposing to consider options to work with other agencies to evaluate means for eliminating the overlapping requirements and redundant processes (see Increase Lease Process Efficiency #5).

Commenters suggested the BLM establish specific timelines and procedures for the various steps in the leasing process. The BLM's existing coal regulations (43 CFR Part 3400) delineate the process for issuing leases (see **Section 5.8** on Leasing Process). While the BLM agrees that improvements in efficiency may be needed (and will be considered as part of the PEIS), past experience with many other programs has proven that mandatory timelines often are not effective in improving efficiency, therefore this option is not considered further.

Other

A large number of commenters discussed the pause on significant new coal leasing decisions instituted through Secretarial Order 3338. Some commenters expressed support for the coal leasing pause, stating that it should be extended or made permanent and reasoned that a sufficient amount of coal has already been leased. Other commenters stated opposition to the coal leasing pause, stating that it should be removed because it negatively impacts the economy and violates laws. The leasing pause does not apply to existing leases and coal production activities and is intended to be in place temporarily while the PEIS is underway.

Some commenters stated concern over both the environmental impacts of leasing and the economic impacts of delays for specific coal lease applications (e.g., Alton Mine, Bull Mountain Mine, and Greens Hollow Coal tract). Consideration of specific leasing actions is outside of the scope of the PEIS. The

²¹⁷ OSMRE Decision on Petition to Initiate Rulemaking, 81 Fed. Reg. 61612 (September 7, 2016).

BLM will however consider the full portfolio of existing BLM leasing activities as part of the analysis in the PEIS.

6.3 COMMUNITY TRANSITION CONSIDERATIONS

A central theme in many of the comments raised by stakeholders is concern about the implications of current and future coal market conditions. As discussed in **Section 5.4.5** and reported by the EIA, in 2015, the United States' total coal production was roughly 900 million short tons, 10 percent lower than in 2014. The 2016 production levels are expected to decrease further, reaching levels not seen since the 1970s. Worldwide, demand for coal appears to be softening as well, with EIA projections for coal exports (the majority of which is metallurgical coal) being relatively flat through 2030, accounting for only approximately 8 percent of total US coal production (see **Section 5.5.3**). As a result of the softening of both the domestic and export markets, a number of mines in the United States have idled production, several major coal companies have entered Chapter 11 bankruptcy, many coal miners have been laid off, and coal-dependent communities have suffered. The EIA and other projections of future coal production show anticipated continuing declines.

Commenters have urged the BLM to take these significant market changes into account when considering reform options for the Federal coal program. In order to make fully informed decisions, stakeholders have requested that the BLM determine what the impacts of reform options will be on factors such as coal production, energy supply, energy prices, state revenues, and jobs (direct and indirect). As discussed in more detail in **Section 6.4**, the BLM intends to evaluate all program alternatives against a set of defined issues for analysis that include all of these critical metrics.

Through the scoping process, stakeholders also provided suggestions to help communities currently in transition or communities that may find themselves in need of transitioning in the near future. While many of these suggestions do not fall under the authority of the BLM's coal program, the BLM believes they are an important part of the larger conversation about coal's future in the United States. The BLM is committed to working with the White House, Congress, and other Federal, state, and local agencies throughout the PEIS process to further these ideas and to address Federal coal reform in the most comprehensive manner possible. The stakeholders' suggestions are summarized below, and it is worth noting that the BLM could seek to secure Congressional authorization to direct a portion of increased Federal coal revenues toward such community assistance programs.

- Undertake meaningful collaboration with coal-producing states concerning socioeconomic impacts related to Federal coal mining
- Develop a program to hire mine workers for restoration and rehabilitation associated with mining operations

- Explore changes to revenue-sharing statutes to improve community access to funding for local school and other community priorities
- Provide communities a comprehensive review of tools to help diversify their economies
- Work to secure Congressional authorization to direct increased royalty and rental payments toward worker and community support
- Establish an Economic Transition Fund that would be sustained by an increase in reimbursement fees charged by the Department of the Interior when processing coal-related applications
- Prioritize support and assistance to help communities transition (e.g., Secretarial Order)
- Accelerate the transition to renewable energy production on Federal lands, identify new opportunities to use abandoned or reclaimed mine lands as renewable energy production sites, and work with partner agencies to assist in retraining coal workers for the renewable energy industry
- Provide assistance to help coal miners transition to other jobs
- Undertake severance tax reform and ensure that taxes that are intended to provide funds to invest in economic diversification in the coalfields are actually being invested back into coal producing counties at a higher rate and in a timely manner
- Look for ways to ensure coal revenue is reinvested in communities to help them break from the boom and bust cycles of fossil fuel extraction

The Power Plus (POWER+) Plan,²¹⁸ proposed in President Obama's FY2016 and FY2017 budgets, and the Obama Administration's corollary POWER Initiative provide an example of recent efforts by the Federal government to help coal communities in transition.

The POWER+ Plan proposed a range of investments in economic diversification, employment and training services, and abandoned mine reclamation targeted to coal communities and workers. It also included Federal transfers to rescue the solvency of the largest multi-employer pension plan serving retired coal miners and their families, and to extend health care coverage to beneficiaries who were going to lose their coverage at the end of 2016.²¹⁹ In addition, it included two

²¹⁸The White House. 2016. Investing in Coal Communities, Workers, and Technology: The POWER+ Plan. Available at https://www.whitehouse.gov/sites/default/files/omb/budget/fy2016/assets/fact_sheets/investing-in-coal-communities-workers-and-technology-the-power-plan.pdf

²¹⁹ The Further Continuing and Security Assistance Appropriations Act of 2017 provided funds to ensure that the health care coverage to these beneficiaries was extended until April 30, 2017. Pub. L. No. 114-254 (Dec. 12, 2016).

new proposed tax credits to catalyze the deployment of carbon capture, utilization, and sequestration (CCUS) technologies in the power sector.

Starting in 2015, the Administration began in parallel—because the economic need was so urgent—the POWER (Partnerships for Opportunity and Workforce and Economic Revitalization) Initiative, which is effectively the economic and workforce development component of the POWER+ Plan. It was a coordinated effort involving ten Federal agencies—including the DOE—with the goal of effectively aligning, leveraging, and delivering a range of Federal economic and workforce development resources to assist communities negatively impacted by changes in the coal industry and coal-fired segment of the power sector.

Since October 2015, as part of the POWER Initiative, Federal agencies have awarded to date roughly \$80 million to support economic and workforce development projects in coal-impacted communities in 15 states. These projects will catalyze economic diversification in industry clusters ranging from advanced manufacturing and agriculture to information technology and tourism and recreation.^{220,221} In addition, in the Consolidated Appropriations Act of 2016, Congress appropriated OSMRE \$90 million for a pilot program in three Appalachian states, inspired by a proposal in the POWER+ Plan, to use General Treasury funds for the reclamation of abandoned mine land sites in conjunction with economic and community development and reuse goals.²²²

6.4 ISSUES FOR ANALYSIS

According to the BLM NEPA Handbook (Section 6.4), an “issue” is a point of disagreement, debate, or dispute with a proposed action based on some anticipated environmental effect. Analysis of an issue is necessary to make a reasoned choice between alternatives. Based on the input received through the scoping process, the BLM has identified the following issues for analysis in the PEIS. Each program reform alternative will be evaluated against these issues, and a comparative analysis will be presented in the Draft PEIS. Consistent with guidance in the BLM’s NEPA Handbook (Section 9.2.9), the BLM will attempt to quantify the effects analysis in the PEIS as much as possible.

²²⁰ The White House. 2016. Fact Sheet: Administration Announces Additional Economic and Workforce Development Resources for Coal Communities through POWER Initiative. October 26, 2016. Available at <https://www.whitehouse.gov/the-press-office/2016/10/26/fact-sheet-administration-announces-additional-economic-and-workforce>

²²¹ The White House. 2015. FACT SHEET: Administration Announces New Workforce and Economic Revitalization Resources for Communities through POWER Initiative. October 15, 2015. Available at <https://www.whitehouse.gov/the-press-office/2015/10/15/fact-sheet-administration-announces-new-workforce-and-economic>

²²² OSMRE. 2016. Guidance for Eligible Projects To Be Funded Under The Abandoned Mine Land Reclamation Economic Development Pilot Program For Fiscal Year 2016. Available at <https://www.osmre.gov/programs/aml/pilotProgramGuidance.pdf>

- What would be the effect of the alternatives on Federal coal production?
- What would be the effect of the alternatives on other energy sources?
- What effect would the alternatives have on substitution between energy sources and between Federal and non-Federal coal?
- What would be the effect of the alternatives on energy prices (wholesale and retail)?
- What would be the effect of the alternatives on net coal exports?
- What would be the change in effect of the alternatives considering sensitivity analysis (e.g., natural gas prices)?
- What would be the effects of the alternatives on socioeconomic factors, including but not limited to, national revenues, state revenues, and employment (direct and indirect)?
- What would be the effect of the alternatives on fair return to the American taxpayer?
- What would be the effect of the alternatives on greenhouse gas emissions (separated by streams: production, transportation, and combustion)?
- What would be the effect of the alternatives in terms of achieving US climate goals?
- What would be the effect of the alternatives on the environment?
- What would be the effect of the alternatives on public health?

6.5 ANALYTICAL APPROACH

Consistent with the requirements of NEPA, the BLM will prepare the PEIS using an interdisciplinary approach, and the disciplines of the preparers will be appropriate to the scope of the analysis and to the issues identified in the scoping process (40 CFR, Subpart I 502.6). As can be seen in the issues identified for analysis (see **Section 6.4**), the PEIS will require economic and national and global energy market expertise among the more traditional disciplines. Further, many of the issues identified for analysis will require the use of sophisticated power sector modeling. The BLM is in the process of assessing the various models that are available and will determine which model or models best meet the analytical needs of the PEIS.

The BLM will prepare a reasonably foreseeable development scenario to support the analysis in the PEIS. The reasonably foreseeable development scenario will forecast coal exploration, development, and production for the planning area for a defined time horizon. This baseline scenario will inform the analysis of the no action alternative and other program reform alternatives.

In accordance with the requirements of NEPA, the PEIS will analyze the direct, indirect, and cumulative impacts of the proposed coal reform alternatives (40 CFR, Subpart 1508.25[c]). As determined appropriate, this will include considerations such as transportation related impacts, health impacts, socioeconomic impacts, and ecological impacts. As discussed in CEQ's guidance "Effective Use of Programmatic NEPA Reviews," a broad (e.g., regional or landscape) description may suffice for characterizing the affected environment in programmatic NEPA reviews, so long as potentially impacted resources are meaningfully identified and evaluated. Further impacts in programmatic reviews are typically discussed in a broad geographic and temporal context with particular emphasis placed on cumulative effects.²²³

In developing the PEIS, the BLM will adhere to CEQ's Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in NEPA Reviews (August 1, 2016). This includes an assessment of greenhouse gas emissions and the effects of climate change on a proposed action and its environmental impacts. The BLM will quantify the projected direct and indirect greenhouse gas emissions associated with the proposed coal reform alternatives to the extent practicable. The BLM will also evaluate the appropriate application of the social cost of carbon and the social cost of methane in the PEIS.

The BLM will use the best available science to support its NEPA analyses in the PEIS (BLM NEPA Handbook Section 6.8.1.2) and will adhere to the five Principles and Practices of Science-Management Integration identified in the March 2015 publication *Advancing Science in the BLM: An Implementation Strategy*²²⁴:

1. Use the best available scientific knowledge relevant to the problem or decision being addressed, relying on peer-reviewed literature when it exists.
2. Recognize the dynamic and interrelated nature of socioecological systems within which the BLM operates.
3. Acknowledge, describe, and document assumptions and uncertainties.
4. Use quantitative data when it exists, in combination with internal and external professional scientific expertise.
5. Use transparent and collaborative methods that consider diverse perspectives.

²²³ Executive Office of the President, Council on Environmental Quality. 2014. Effective Use of Programmatic NEPA Reviews. December 2014. Available at https://ceq.doe.gov/current_developments/docs/Effective_Use_of_Programmatic_NEPA_Reviews_Final_Dec2014_searchable.pdf

²²⁴ BLM. 2015. Advancing Science in the BLM, an Implementation Strategy. Available at http://www.blm.gov/style/medialib/blm/wo/blm_library/BLM_pubs.Par.38337.File.dat/BLMAdvSciImpStratFINAL032515.pdf

The BLM will conduct a thorough review of all data, reports, and studies submitted to the BLM over the course of the NEPA process and incorporate them as appropriate into the NEPA analysis. A list of the data and reports submitted through the scoping process can be found in the annotated bibliography in **Appendix E** (see **Section 4.6.I** for more information). The BLM will work with Cooperating Agencies and other industry experts as necessary in conducting this work.

Consistent with NEPA, the PEIS will concentrate on the issues that are truly significant to the action in question rather than amassing needless detail (40 CFR, Subpart 1500.1). While the reform options under consideration are fairly expansive, the BLM will work to keep the PEIS as focused as possible with a goal of developing a document that is understandable to the larger public and completed in a timely manner.

6.6 ENERGY AND ECONOMIC ANALYTICAL CONSIDERATIONS

The development of the PEIS will involve detailed analysis of options, option combination packages, and alternatives with a goal of addressing the issues for analysis described in **Section 6.4**.

Of particular relevance will be analyzing effects on energy markets and the energy economy as well as fiscal effects. Most obviously, adjustments to the Federal coal program have the potential to impact Federal coal production as well as employment and the state and Federal revenues associated with production. Moreover, policy options also have the potential to impact greenhouse gas emissions directly through limitations on production or indirectly through mechanisms that factor in the environmental externalities of coal production. However, as illustrated by comments and accompanying studies and reports, there are a wide array of variables and constraints to consider when examining how coal reform would interact with other components of the national energy and economic systems. Some of these considerations are highlighted below. These considerations present key next steps for the BLM, Cooperating Agencies, and other interested stakeholders in examining reform opportunities for the Federal coal program.

Modeling choice for energy sectors: The impacts from reforms to the PEIS would be absorbed over an extended period of time as it is adopted through new or renewed coal leases as current lease contract periods expire.²²⁵ As noted above, reform options would have the potential to affect not just Federal coal production, but national energy and economic systems as a whole. Estimating these potential system wide effects requires modeling the complex interactions of the power sector and various fuel sources. There are a number of power

²²⁵ Existing leases are generally structured as 20-year contracts and would not be directly impacted by the reform until up for renewal.

sector models available to assist the BLM in this task.²²⁶ The power sector represents the chief source of demand for Federal coal; its detailed representation and ability to respond to changes in fuel cost through dispatch and capacity changes are critical to accurately modeling any leasing reform.

Capacity expansion models that optimize electricity dispatch and generation subject to fuel costs and regulatory constraints are ideal for analyzing these types of long-run power generation scenarios and the policies that drive them.²²⁷ Production cost models and network reliability models have higher temporal resolutions focused on near-term electricity production and dispatch decisions and generally apply to more narrow geographies. Given the nationwide power market implications of Federal coal leasing reform and the extended time horizon for which its impact would be assessed, capacity expansion models would offer an advantage over other power-sector models. These types of models can provide the temporal and spatial dimensions necessary to best capture the full impacts of leasing decisions. The discussion below highlights important considerations regarding modeling assumptions and inputs and outputs.

Model Inputs

- I. *Coal Supply Representation:* With slightly over 40 percent of coal produced in the United States coming from Federal lands, a key data element for analysis and modeling will be distinguishing between coal supplied from Federal coal leases and other non-Federal mineral ownership. This distinction would allow the BLM, when specifying modeling inputs, to most accurately link any coal reform changes to the mines on the supply-side that will absorb those changes. Furthermore, being able to distinguish between the types of mine—surface or underground—will also be a relevant distinction for analytic efforts. Federal coal leasing currently involves different royalty rates for surface and underground mines, and it is likely that any alterations that address fair return or environmental impacts would likely impact these mine types differently. Finally, a data field that distinguishes whether a particular mine is an existing lease, a renewed mine lease, or a new lease would be central to appropriately reflecting Federal coal leasing changes when designing modeling parameters. Any Federal coal leasing changes would likely only apply to renewed and new leases and, therefore, having a detailed mine-by-mine coal supply representation that made this distinction would allow the BLM to best reflect the policy parameters in its analysis. In summary, having detailed mine-by-mine

²²⁶ Howard, P. 2016. The Bureau of Land Management's Modeling Choice for the Federal Coal Programmatic Review. New York University Institute for Policy Integrity. June 10, 2016. Available at <http://policyintegrity.org/publications/detail/BLM-model-choice>

²²⁷ Ibid.

supply assumptions that include data on each mine's Federal/non-Federal, surface/underground, and existing/new status will equip the BLM with the appropriate data necessary to best analyze any coal reform changes.

2. *Coal Transportation Representation:* The primary consumer of Federal coal is the power sector. Many of these buyers are located far away from the western coal lands where the majority of coal from Federal leases is produced. Consequently, compared with other domestic coal sources, the cost of transportation is typically a more significant factor into the delivered price of western coal. Therefore, having an accurate representation of the linkages from coal supply regions to the power plant is critical to assessing the delivered price of coal to power markets and the corresponding dispatch decisions to meet electricity demand. Data regarding the mode of transportation (e.g., rail, barge, and truck) from mine to power plant and the cost per ton-mile transported will likely be an important model input. Any capacity limitations would also be critical to understand—and to capture as a constraint—in analysis to ensure that significant changes in coal supply origins are compatible with current and future infrastructure. Finally, coal transportation cost and supply linkages between plant and supply region may be informed by historical data (such as fuel receipts provided in EIA Form 923). However, the BLM would likely need to identify possible rail linkages, not just historical ones, between supply regions and plants to ensure that new transportation options to competing basins are an option, where appropriate, for power plants in optimization models to prevent any bias against substitution in its analysis.
3. *Coal Demand Representation:* Demand for Federal coals is almost entirely from US power plants. Power plants base their purchase decisions on a variety of factors, including the delivered price per mmBtu of a particular coal, compatibility with boiler design, and the environmental properties of the coal, the compatibility with current pollution control equipment (e.g., flue gas desulfurization or dry sorbent injection), and emission requirements. Moreover, coal plants may have captive competition where they only access coal markets through a single rail carrier, or they may have a more competitive position where they can access coal supply through a variety of the primary rail carriers. While a mine-by-mine representation of coal supply will allow the BLM to most accurately estimate the effect of coal reform adjustments on availability of different types of coal, a detailed plant-by-plant representation of the power sector will help best capture how any changes affect the demand for coal as well as other fuel sources. A bottom-up model that starts with a database of the power plant fleet and contains capacity, historical fuel consumption, boiler design, plant-specific pollution controls, and emissions constraints for each power plant will be a central data element to future PEIS analysis.

Model Outputs/Impacts Dependent on Model Outputs

- I. *Substitution:* With appropriate model structure and supply and demand representation, the impact of any Federal coal program reforms will ultimately pivot on substitution. Specifically, this includes estimated shifts to/away from Federal coal and estimated shifts to/away from competing electricity generation (e.g., non-Federal coal, natural gas, renewable, etc.). To inform substitution effects, the BLM may use power-sector models that accurately reflect electricity generation capacity and capacity expansion, as well as cost and performance metrics of each form of electricity generation.

In regard to coal switching between Federal and non-Federal it is important to fully capture the cost of such switching to ensure there is no bias for or against substitution. For instance, the majority of Federally produced coal is subbituminous, and the majority of non-Federal coal is bituminous. When a coal boiler built for subbituminous substitutes to bituminous, it may require soot blowing or heat transfer surface modifications to handle the low ash fusion temperatures and/or corrosive nature of its higher chlorine content. These costs, in addition to the fuel costs, are critical data elements to capture when assessing substitution. Likewise, when a boiler built for consuming bituminous coals substitutes to subbituminous, it may experience additional capital cost in the form of increased material handling, milling capacity, and dust control. Finally, a plant may have an investment in certain control technologies, such as dry sorbent injection, that only function with certain coal ranks and, thus, this data needs to be considered when assessing substitution costs.

When switching to/from natural-gas fired generation, it is important to have production and pipeline data to ensure that the levels of substitution are not inconsistent with infrastructure capabilities. Likewise, it is important to appropriately reflect the cost and performance of renewable technologies to identify the degree to which this technology serves as a substitute. Due to the long time horizon under consideration when evaluating PEIS reform and the rapidly evolving changes regarding renewable energy costs, it is a data component that may benefit from sensitivity analysis. For example, its viability as a substitute may be informed by current cost and performance metrics in one sensitivity, but a different set of technology cost and performance assumptions reflecting recent trends and growth may be used for sensitivity.

Some commenters have conducted initial analysis that informs the likely substitution effects from different policy scenarios and may help inform further exploration of substitution effects. For example, Vulcan Philanthropy looked at varying scenarios where different royalty rates were applied. With CPP, the royalty change resulted in a substitution as high as 0.75 tons of non-Federal coal for every ton of Federal coal decline

in 2030. At higher royalty rates, these substitution rates reached levels where only 0.5 tons of additional non-Federal coal were produced for every ton of Federal coal reduced in 2030 as the power sector increasingly looks for non-coal energy (e.g., natural gas) sources to replace larger decreases in Federal coal production.²²⁸ As the substitution rate to non-Federal coal became smaller, the substitution to natural gas became larger, reflecting the competitive reality of these two fuels as marginal dispatch sources.

The environmental (including climate change) and economic impacts of reform alternatives depend, in large part, on the estimated substitution effects. For a variety of reform options, identifying substitution will be a critical early data element to enable the BLM to subsequently determine the power system impacts, corresponding cost and benefits, changes to state/Federal revenues, employment, and greenhouse gas emissions impacts. Some of those impacts are explored further below.

2. *Employment Impacts:* The BLM will analyze employment impacts (as well as impacts on other economic metrics such as output, gross domestic product, and labor income) to sectors potentially affected by reform alternatives. The prior discussion highlights that these impacts extend beyond the coal sector to the energy industry as a whole, as well as other industries affected by the multiplier impacts of coal production, transportation, and generation. The estimated substitution results of alternative reforms will serve as primary input for such an analysis on employment impacts to various sectors.

One key consideration for analyzing coal employment impacts relates to differences in labor intensity of Federal and non-Federal coal. The majority of Federal coal is surface mined and has the lowest labor intensity in the nation, whereas the non-Federal coals generally require much more labor per ton of coal removed. For instance, in Wyoming, where the majority of Federal coal is located, the aggregate coal mine productivity is 29 tons per labor hour. Illinois, Pennsylvania, and West Virginia, where many of the competing non-Federal coals are mined, have productivity rates in the range of 2 to 6 tons per labor hour due to the thinner and more difficult-to-reach seams (see **Table 6-2**, which shows coal labor employment and productivity for the seven largest states by employment).²²⁹ This means that for each ton of Federal coal

²²⁸ Vulcan Philanthropy. 2016. Federal Coal Leasing Reform Options: Effects on CO2 Emissions and Energy Markets. Fairfax, Virginia: Vulcan Philanthropy/ICF International. January 2016. Available at <http://www.vulcan.com/MediaLibraries/Vulcan/Documents/Federal-Coal-Lease-Model-report-Jan2016.pdf>

²²⁹ US EIA. 2016. Data from Annual Energy Outlook Coal Data Browser. Available at <http://www.eia.gov/beta/coal/data/browser/#!/topic/37?agg=0,2,1&geo=vvvvvvvvvvvo&mntp=g&freq=A&start=2001&end=2014&ctype=map<ype=pin&rtype=s&mtype=0&rse=0&pin=>

Table 6-2
Labor Requirements to Mine Coal

	Employment	Productivity (tons per labor hour)
West Virginia	18,330	2.69
Kentucky	11,834	2.8
Pennsylvania	7,938	3.52
Wyoming	6,624	28.62
Illinois	4,218	5.99
Indiana	3,810	4.21
Alabama	3,694	1.88

Source: US EIA 2016²³⁰

replaced by a ton of non-Federal coal, the amount of coal labor may increase by a factor of 10. The BLM will examine the substitution impacts from any coal reform to assess the impact on employment markets in non-Federal coal mining markets and in natural gas markets. The EIA data on productivity and employment will be one critical element to understanding coal mining job impacts from any reform efforts and subsequent substitution.

Initial analysis provided by commenters examining the impact of various coal reform options, such as royalty rate adders, highlighted that nationwide coal mining employment increased (by more than 5 percent) as a result of Federal royalty rate adders that made non-Federal coals more competitive.²³¹ With appropriate data on substitution and employment, the BLM can further explore the potential to simultaneously increase coal revenues and employment. **Figure 6-1** highlights the negative correlation historically observed between Powder River Basin production and coal mining jobs. The BLM analytical efforts could help ensure that the price for which Federal coals are leased reflects FMV in order to prevent any effective subsidization of western coal mining jobs at the expense of eastern coal mining jobs.

3. *Electricity Prices* - Any changes that make fuel more expensive will likely be carried through to the end user of the fuel—the electric ratepayer. The BLM will assess how these changes to Federal coal leasing impact fuel cost and related capital cost, and how those costs are passed through to ratepayers.

²³⁰ US EIA. 2016. Coal data browser. Available at www.eia.gov/beta/coal/data/browser

²³¹ Gillingham, K. and J. Stock. 2016. Federal Minerals Leasing Reform and Climate Policy. Hamilton Project Policy Proposal 2016-07. December 8, 2016. Available at https://www.brookings.edu/wp-content/uploads/2016/12/es_20161208_federal_minerals_leasing_reform_and_climate_policy_pp.pdf

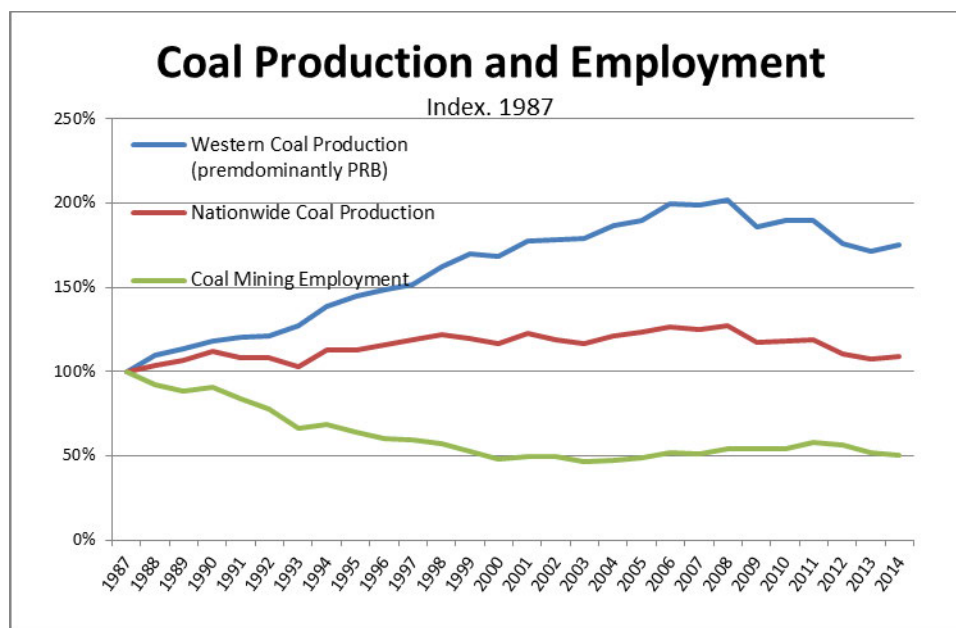


Figure 6-1. Powder River Basin Production and Nationwide Coal Employment

Source: Employment: MSHA 2016²³²

Production (1987-2011): US EIA. 2012²³³

Production (2012-2015): US EIA 2016²³⁴

4. *Revenue Impacts:* The BLM will analyze data on government revenues as a result of any coal leasing changes. This includes assessing effects on the Federal revenue sources, particularly revenues associated with bonus bids, rental rents, and royalties. To the extent feasible, the BLM will assess effects on other Federal taxes (e.g., Reclamation Fee and Black Lung Excise Tax) and effects on relevant state and local revenues. The analysis released by the Council of Economic Advisors suggests that as coal royalties increase up to a certain point so too do government revenues.²³⁵ That is, the increase in revenue from higher royalties more than offsets any decline in production and bonus bids. For example, their analysis suggested that a royalty charge of \$30/ton would result in an additional 2.7 to 3.1 billion dollars in government revenues each year after 2025 when the changes are fully phased in even though total annual production would decrease by 53 percent. Regional coal

²³² MSHA (United States Department of Labor Mine Safety Health Administration). 2016. Coal Mine and Employment Data. Accessed September 2016. Available at <http://arlweb.msha.gov/OpenGovernmentData/OGIMSHA.asp>

²³³ US EIA. 2012. Annual Energy Review. Table 7.2: Coal Production, 1949-2011. Available at: <https://www.eia.gov/totalenergy/data/annual/showtext.php?t=ptb0702>.

²³⁴ US EIA. 2016. 2016 Annual Coal Report. Table 1. Coal Production and Number of Mines by State and Mine Type. November 3, 2016. Available at: <http://www.eia.gov/coal/annual/>.

²³⁵ Council of Economic Advisors, Executive Office of the President. 2016. The Economics of Coal Leasing on Federal Lands: Ensuring a Fair Return to Taxpayers. June 2016. Available at https://www.whitehouse.gov/sites/default/files/page/files/20160622_cea_coal_leasing.pdf

production forecasts, including forecasts specific to Federal leases, are the key input for analyzing revenues. Therefore, outputs that detail production levels from different coal supply regions and Federal mines will be critical results from the energy sector model.

5. *Externalities:* Economic theory indicates that markets are optimized when the full marginal cost of production (including externalities) is equal to the marginal benefits. In order to reflect this optimal level, fuels such as coal would have a cost that reflects not only the extractive component but also any environmental or social damages associated with them. When examining externalities, the BLM would need data and analysis regarding the social cost of methane and the social cost of carbon per ton of coal produced. These values, and instructions on how to incorporate them, are available from the Interagency Working Group on the Social Cost of Carbon. The BLM would also need to project the incremental changes in methane and CO₂ emissions from upstream, midstream, and downstream portions of coal's lifecycle. These estimates are needed for all coal not just coal from Federal leases, as well as from competing fossil fuel substitutes such as natural gas. Having this price and volume data would allow the BLM to assess the total impact of any coal reform changes.

Commenters also pointed out other, non-climate-based externalities on which the BLM would need better data quantification. These include the ecosystem impacts from coal mining, lifecycle criteria pollutant impacts, rail transportation fatalities, etc. Emission estimates for SO₂, NO_x, and mercury will be useful data points for informing the benefits of any coal reform changes. These changes will largely manifest themselves in the power sector, so using a model that included outputs for these variables will be an important consideration in the BLM's analytic endeavors. Finally, being able to understand the locational impact of these changes will empower the BLM and the public to best understand the distributional aspects of the cost and benefits to coal reform. Having this data will help the BLM consider environmental justice impacts as required under NEPA and to consider how best to address adverse community impacts from any coal job loss as well as other labor impacts.

6. *Sensitivity:* Sensitivity analysis will be central to any assessment of Federal coal leasing reform due to the uncertainty of energy markets over the extended time horizon affected by any leasing changes. Therefore, specifying modeling runs that test the same policy scenario under different market and regulatory assumptions (i.e., sensitivity analysis) will be useful to determine a range of possible results that capture the uncertainty of policy impacts. These sensitivities may include, but are not limited to, testing policy changes:

- a) With reference case natural gas prices, as well as high and low natural gas prices scenarios
- b) With high and low renewable technology cost and performance assumptions
- c) With and without additional coal export terminal capacity on the West Coast
- d) With and without improved cost performance of carbon capture and sequestration

6.7 SCHEDULE

As discussed previously, on January 15, 2016, Secretary Jewell issued Secretarial Order 3338 directing “the BLM to prepare a discretionary PEIS that analyzes the potential leasing and management reforms to the current Federal coal program.” In the press release and other materials released with the Secretarial Order and Notice of Intent, the Secretary indicated that the PEIS would take approximately 3 years to complete.

Following the CEQ regulations at 40 CFR, Subpart 1508.22, a Notice of Intent to prepare a PEIS was issued on March 30, 2016, which initiated the scoping process. The proposed schedule for the PEIS can be found in **Table 6-3**. The BLM will prepare a Draft PEIS using the information received during the scoping process and will provide, at minimum, a 45-day public comment period on the Draft PEIS (43 CFR, Subpart 1506.10). The BLM plans to release the Draft PEIS in January 2018. The BLM will incorporate public comments received on the Draft PEIS and prepare a Final EIS (40 CFR, Subpart 1502.9) by January 2019, with a Record of Decision to follow by March 2019 (40 CFR, Subpart 1506.10).

Table 6-3
Proposed Schedule for the PEIS

Milestone	Proposed Date
Scoping Report	January 2017
Draft PEIS	January 2018
Public Comment Period	January – March 2018
Final PEIS	January 2019
Record of Decision	March 2019

From: [Culver, Nada L](#)
To: [Sanchez, Alexandra L](#)
Subject: RE: [EXTERNAL] Two O&G Bills Introduced Today
Date: Tuesday, June 22, 2021 2:48:26 PM

These are 2 of my favorites.

Nada Wolff Culver
Deputy Director, Policy and Programs
Bureau of Land Management
Cell: 202-255-6979
nculver@blm.gov

From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Tuesday, June 22, 2021 12:46 PM
To: Culver, Nada L <nculver@blm.gov>
Subject: Re: [EXTERNAL] Two O&G Bills Introduced Today

Ah yes, will definitely do that and flag for Laura

From: Culver, Nada L <nculver@blm.gov>
Sent: Tuesday, June 22, 2021 12:12:02 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Subject: RE: [EXTERNAL] Two O&G Bills Introduced Today

And now we can update the report to reflect this introduction....

Nada Wolff Culver
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From: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>
Sent: Tuesday, June 22, 2021 12:10 PM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Diera, Alexx A <adiera@blm.gov>; Feldgus, Steven H <steve_feldgus@ios.doi.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Gray, Morgan <Leslie_Morgan_Gray@ios.doi.gov>; Kelly, Katherine P <Kate_Kelly@ios.doi.gov>
Subject: RE: [EXTERNAL] Two O&G Bills Introduced Today

Thanks, Drew.
Looping Steve too!
Alex

From: Wallace, Andrew G <andrew_wallace@ios.doi.gov>
Sent: Tuesday, June 22, 2021 12:09 PM
To: Sanchez, Alexandra L <alexandra_sanchez@ios.doi.gov>; Diera, Alexx A <adiera@blm.gov>
Cc: Culver, Nada L <nculver@blm.gov>; Daniel-Davis, Laura E <laura_daniel-davis@ios.doi.gov>; Gray, Morgan <Leslie_Morgan_Gray@ios.doi.gov>; Kelly, Katherine P <Kate_Kelly@ios.doi.gov>
Subject: FW: [EXTERNAL] Two O&G Bills Introduced Today

FYI

From: Donovan, Patrick (Bennet) <Patrick_Donovan@bennet.senate.gov>
Sent: Tuesday, June 22, 2021 2:02 PM
To: Wallace, Andrew G <andrew_wallace@ios.doi.gov>; Gray, Morgan <Leslie_Morgan_Gray@ios.doi.gov>
Cc: Sawaged, Maryana (Bennet) <Maryana_Sawaged@bennet.senate.gov>; McCleery, Austin (Bennet) <Austin_McCleery@bennet.senate.gov>
Subject: [EXTERNAL] Two O&G Bills Introduced Today

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hey Morgan and Drew,
Today Senator Bennet reintroduced two bills related to oil and gas leasing and development on public lands. I've attached the bill text for each of them. Please let me know if you have any questions.

Thanks,
Pat