



July 27, 2017

BY ELECTRONIC MAIL

Bureau of Land Management
Utah State Office
Moab Field Office
Attn: Doug Rowles
82 East Dogwood
Moab, UT 84532
BLM_UT_MB_Comments@blm.gov

Re: Scoping Comments, Canyon Country District March 2018 Oil and Gas Lease Sale

Dear Mr. Rowles,

WildEarth Guardians (“Guardians”) submits the following scoping comments in response to the Bureau of Land Management’s (“BLM’s”) request for feedback on its proposal to lease 45 publically-owned oil and gas parcels totaling 57,075 acres in its March 2018 oil and gas lease sale. Twenty-five of the parcels are located in the Monticello Field Office area and twenty of the parcels are located in the Moab Field Office area.

WildEarth Guardians is a nonprofit environmental advocacy organization dedicated to protecting the wildlife, wild places, wild rivers, and health of the American West. On behalf of our members, Guardians has an interest in ensuring the BLM fully protects public lands and resources as it conveys the right for the oil and gas industry to develop publicly-owned minerals. More specifically, Guardians has an interest in ensuring the BLM meaningfully and genuinely takes into account its requirement to protect public lands for future uses and the climate implications of its oil and gas leasing decisions.

As discussed below, Guardians is concerned about three issues posed by the BLM’s proposal to lease these parcels: 1) the impacts to Bears Ears National Monument, 2) the cumulative climate impacts from this sale coupled with the BLM’s leasing activities in the West, and 3) the BLM’s failure to use the social cost of carbon protocol.

- **The BLM should defer the leases near Bears Ears National Monument.** As the BLM is well aware, it has a multiple use mandate to manage federal lands to “sustain the health, diversity, and productivity of America’s public lands for the multiple use and enjoyment of present and future generations.”¹ A large number of the proposed

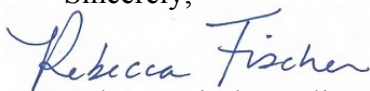
¹ U.S. Dep’t of Interior, Bureau of Land Management, *Our Mission*, <https://www.blm.gov/about/our-mission>.

lease parcels are directly adjacent or in close proximity² to the southeastern corner of Bears Ears National Monument. The Bears Ears region is “[a]mong the most significant culture landscapes in the U.S.” and “has abundant rock art, dwellings, ceremonial sites, granaries, and many other cultural resources reflecting its historical and cultural significance to a variety of Native American peoples.”³ Furthermore, the industry has plenty of existing leases in the area and does not need more handouts. Thus, the BLM should defer the leases near Bears Ears National Monument.

- **The BLM must defer leasing the remaining parcels until it thoroughly analyzes the cumulative climate change impacts from the various BLM lease sales currently occurring in Utah and surrounding Western states.** As Guardians has repeatedly stated in its comments to the BLM, the agency has leased or is proposing to lease approximately 768 parcels or 617,878.04 acres of publically-owned land in the Utah, Colorado, Nevada, New Mexico, and Wyoming in 2017. The National Environmental Policy Act (“NEPA”) requires the BLM to analyze the impacts of these “similar” and “cumulative” actions in the same NEPA document in order to adequately disclose impacts in an Environmental Impact Statement or provide sufficient justification for a Finding of No Significant Impact in an Environmental Assessment. *See* 40 C.F.R. §§ 1508.25(a)(2) and (3). Failure of the BLM to do so will result in a violation of NEPA.
- **The BLM must analyze the costs of reasonably foreseeable carbon emissions using the well-accepted, valid, credible, GAO-endorsed, interagency method for assessing carbon costs.** The social cost of carbon protocol is a useful, meaningful tool, and the BLM cannot ignore it or summarily dismiss its use. The Environmental Protection Agency has used it for project-level decisions, and at least two BLM offices have successfully utilized this tool in the context of oil and gas proposals. Thus, the use of this tool is not only possible, but is incredibly instructive in order to weigh the impacts of an agency decision. The BLM must consider its use or thoroughly explain why the protocol is not applicable for this lease sale.

We look forward to BLM objectively analyzing the potentially significant impacts that will arise from this lease sale and issuing a well-informed and legally-sufficient decision.

Sincerely,



Rebecca Fischer, Climate Guardian
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² *See* BLM, *District Overview Map: March 2018 Competitive Oil and Gas Lease Sale*, https://eplanning.blm.gov/epl-front-office/projects/nepa/82261/110823/135692/District_Overview_Map.pdf.

³ U.S. Forest Serv., *Bears Ears National Monument: Questions and Answers*, <https://www.fs.fed.us/sites/default/files/bear-ears-fact-sheet.pdf>.