

September 20, 2021

National Coal Program Review
In care of: Thomas Huebner
BLM Wyoming State Office
5353 Yellowstone Rd.
Cheyenne, WY 82009

RE: Review of the Federal Coal Leasing Program

Thomas and colleagues,

Thank you for the opportunity to comment as part of the review of the Federal Coal Leasing Program. We, members of the [People, Public Lands, and Climate Collaborative](#), are supportive of the Department of Interior's commitment to soliciting and incorporating stakeholder input on its decisions.

The People, Public Lands, and Climate Collaborative is an informal network of U.S.-based NGOs who believe in the importance of a climate plan for public lands. Our common goal is ensuring that public lands are part of a just and equitable climate solution by:

- Promoting sustainability, climate resiliency, and healthy communities and economies;
- Protecting, connecting, and restoring critical landscapes and lands; and
- Reducing emissions from energy produced on public lands.

The Collaborative's guiding principles, as articulated in our [Shared Framework: A Climate Plan for Public Lands](#), are defined below, along with recommendations for how the Department of Interior (DOI) can enact these principles.

In determination of next steps for the Federal Coal Leasing Program and as DOI continues to establish stakeholder relationships and develop a stakeholder engagement approach that is accessible and inclusive, the People, Public Lands, and Climate Collaborative respectfully asks that you consider and act in the spirit of the Collaborative's guiding principles: acknowledgement of history, a balanced approach to climate solutions, stakeholder engagement, and sense of urgency. We have been pleased to see DOI already acting in the spirit of these principles and recommendations and we encourage the Department to continue to do so throughout the review of the Federal Coal Leasing Program.

These guiding principles and recommendations also echo some of the comments received on the Jewell Order, especially those related to concern about climate change, concern about loss of jobs and coal revenue when coal production is reduced, support for increased transparency and public participation and royalty decisions, and the importance of carefully and equitably balancing the benefits and burdens related to use of our public lands.

ACKNOWLEDGEMENT OF U.S. HISTORY

The U.S. conservation movement historically has benefitted from the forced and/or coercive displacement of Indigenous and non-Indigenous peoples. Public lands have been spaces often restricted – explicitly or implicitly – to use and management by individuals with racial, economic, and geographic privilege.

Our recommendations:

- Issue a statement with actionable items on the relationship between public lands and colonization, with acknowledgement of the ways that public lands have been places restricted to people with privilege.
- Incorporate historical knowledge into land management practices, both in the form of Indigenous conservation practices and federal land management strategies that respect landscapes, objects, and plant and animal life held sacred by Indigenous peoples.
- Measure the cumulative impacts of climate change caused by fossil energy development on public lands and demonstrated by adverse impacts to communities, landscapes, and wildlife on or near public lands.
- Continue to distinguish between inclusive stakeholder engagement with the general public and government-to-government consultation with Tribal Nations.
- Identify ways that co-management with Tribal stakeholders can be prioritized in DOI land management practices.

A BALANCED APPROACH TO SOLUTIONS

All climate solutions for public lands must consider emissions, the impact on wildlife, and the impact – including economic – on the community. Every solution has potential benefits and drawbacks; drawbacks should be mitigated and their burden/impact fairly shared.

Our recommendations:

- Clearly and broadly define “stakeholder” in public engagement efforts to ensure input from a wide range of perspectives.
- Establish a process to evaluate and publicly communicate decisions made about public lands, including the rationale for those decisions, and their implications for each stakeholder group.
- Be more transparent about resource allocations by requiring the development and public release of a Resource Management Plan for every national park and monument within five years of establishment and require its update every five years thereafter.
- Audit the skill sets and expertise of career staff to ensure that, as staffing gaps from the prior Administration and the Bureau of Land Management move are addressed, staff is carefully rebalanced with diverse voices (in terms of race, ethnicity, gender, disability, and other factors related to lived experience and identity) and perspectives (in terms of areas of expertise).
- Honor the perspectives of environmental justice leaders and communities by providing guidance and support to bureaus to realize the protections of the National Environmental Protection Act.

STAKEHOLDER ENGAGEMENT

Public lands are for everyone. All land management planning should consider and act upon the input of local communities and the broader public – this includes Indigenous populations and others who have historically been harmed by land conservation and development on lands. Those who stand to be most affected by public lands decisions must be able to provide input into and influence that decision.

Our recommendations:

- Define and clearly communicate the roles and decision-making power of stakeholders.
- Engage Black, Indigenous, and people of color leaders and organizations as decision makers, not just advisors.
- Ensure that scoping periods and other opportunities for engagement are announced outside the Federal Register, including in local news and radio announcements.

- Offer many different avenues for engagement, including through mail, email, web forums, phone, in person, video conferencing, etc.
- Ensure that engagement events – both online and in-person – are accessible and comfortable for participants by providing basic tools and services, including translation, interpretation, refreshments, child care, and ample time and opportunity for all participants to be heard.
- Incorporate the stakeholder engagement recommendations in President Obama’s [Presidential Memorandum on Promoting Diversity and Inclusion in Our National Parks, National Forests, and Other Public Lands and Waters](#).

SENSE OF URGENCY

The climate crisis and the consequences of inaction continue to have devastating impacts on our communities, economies, and ecosystems. We must take bold action now.

Our recommendations:

- Listen to the stories of communities and individuals who are already experiencing acute impacts from the climate crisis through adverse health impacts from environmental racism, pollution, visible changes to landscapes and weather patterns, and climate migration.
- Develop and implement a plan to track and reduce emissions from public lands, recognizing that the United States’ ability to meet its recommitment to the Paris Agreement will require us to leverage the climate mitigation and adaptation potential of our public lands.

Thank you for your consideration of the principles that have guided the People, Public Lands, and Climate Collaborative’s work and could help guide yours. We look forward to being a resource to DOI to ensure that this vision comes to fruition, and look forward to partnering with Secretary Haaland and DOI leadership on an inclusive stakeholder engagement process that prioritizes those most affected by decisions made regarding public lands -- peoples lands. Our third-party facilitator, Mallory Huggins, can serve as a point of contact going forward at mhuggins@keystone.org or 303-947-7013.

Respectfully,

The following members of the People, Public Lands, and Climate Collaborative

Lauren Berutich, Great Old Broads for Wilderness

Karyn Bigelow & Avery Davis Lamb, Creation Justice Ministries

Emily Cleveland, Wild Montana

TJ Ellerbeck, Rural Utah Project

Catherine Garoupa White, Central Valley Air Quality Coalition

Emily Hornback, Western Colorado Alliance

Nate Martin, Better Wyoming

Mario Molina, Protect Our Winters

Ángel Peña, GreenLatinos

Will Roush, Defiende Nuestra Tierra

Camilla Simon, Hispanic Enjoying Camping, Hunting, and the Outdoors (HECHO)

Juli Slivka, Wilderness Workshop

Ben Tettlebaum, The Wilderness Society