

April 14, 2021

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

Re: Recommendations for Scope and Criteria for Review of the Federal Fossil Fuel Programs

Dear Secretary Haaland:

This letter provides comment on the Department of the Interior's review and reform of the federal fossil fuel programs, as set forth in Executive Order 14008 of January 27, 2021. We very much appreciate President Biden's "whole of government" approach to confront the climate crisis and specifically appreciate his actions directing Interior to pause further oil and gas leasing and to initiate a "a rigorous review of all existing leasing and permitting practices related to fossil fuel development on public lands and waters."

We encourage Interior to undertake this review in light of a scientific truth: full exploitation of the world's already operating oil and gas fields would push global warming well past 1.5 degrees Celsius. Put simply, any new fossil fuel development, including federal fossil fuel leasing and permitting, is incompatible with the Paris Climate Agreement's scientific warming thresholds--thresholds designed to preserve a livable planet.

In light of the Biden Administration's renewed commitment to scientific integrity, it is essential that a review follow the science and openly consider the climate and equity consequences of all reasonable alternatives. This includes specific consideration of alternatives that bring an orderly end to all federal fossil fuel leasing and development, including that of coal, oil, gas, tar sands, and oil shale from federal lands and waters. For this reason we underscore the importance of employing existing Secretarial authority to pause new oil and gas leasing during the review as a mechanism to preserve the widest range of options available for consideration and to thereby facilitate a robust and meaningful review of the federal fossil fuels program.

Consistent with President Biden's call to action, now is the time to secure a thriving, climate resilient future. We support your climate leadership and commitment to action, and urge you to deliver a comprehensive, rigorous, transparent, and programmatic review that secures the legacy of success you intend—and that we all expect—and proves durable through time. That necessarily entails the fair and meaningful involvement of all people, in particular communities vulnerable to climate change and impacted by or now dependent upon the federal fossil fuel program. Any changes to the federal fossil fuel program as result of the review should include science-based action to account for near-term climate risks, deliver on environmental justice,

support fossil fuel-dependent and impacted communities through a transition period, defend taxpayers and the public interest, and conserve public lands and waters in accord with the President's goal of conserving at least 30 percent of U.S. lands and waters by 2030.

To ensure that review and reform efforts get off on the right foot, we offer the following recommendations.

1. The Scope of Interior's Federal Fossil Fuel Program Review Should be Comprehensive, Robust, and Driven By Science

We urge you to prepare a programmatic environmental impact statement (PEIS) pursuant to the National Environmental Policy Act (NEPA). The PEIS should define a purpose and need such that the PEIS may:

- Determine the compatibility of cumulative greenhouse gas emissions from the federal fossil fuels program with the United States' goal of limiting warming to 1.5 degrees Celsius, including reducing greenhouse gas emissions by at least 50 percent by 2030, and to near zero by 2040;
- Assess all reasonable alternatives for how the federal fossil fuel programs can conform to a 1.5 degrees Celsius warming threshold, including through a prompt, orderly, and equitable transition away from the production, use, and export of federal fossil fuels;
- Review all federal agencies' actions, resource management plans, programs, policies, and regulations that affect the leasing, permitting, production, and use of domestically produced fossil fuels, including coal, oil, gas, tar sands, and oil shale;
- Evaluate the climate impacts of federal fossil fuel management not just in a domestic context, but in the context of the United States' fair share of global climate mitigation obligations;
- Ensure that existing fossil fuel operations provide sufficient financial assurances to reclaim lands and waters once development ends; and
- Support complementary goals and objectives, including protection of 30% of our nation's lands and waters and delivering on environmental justice.

To achieve these aims, we specifically ask that Interior:

a. Develop a PEIS

The notice of intent initiating the PEIS should provide that the purpose and need of the proposed action is to develop a cumulative greenhouse gas emissions analysis as a basis to ensure the compatibility of leasing, permitting, extraction, and combustion of fossil fuels from public lands and waters is consistent with the United States' goal of limiting climate change to 1.5 degrees Celsius. The notice should commit to evaluating all reasonable alternatives, including alternatives outside the immediate authority of the land management agencies, for how the

federal fossil fuel programs can contribute to a prompt, orderly, and equitable transition away from the production, use, and export of federal fossil fuels.

b. Employ a Carbon Budget Compatibility Analysis

The Department's PEIS should employ carbon budgeting as at least one methodology to assess the compatibility of the federal fossil fuel programs' cumulative greenhouse gas pollution with the United States' goal of limiting warming to 1.5 degrees Celsius. To achieve this goal, global emissions must be reduced by half over the next decade. Accordingly, it is in the national interest for the United States, based on our cumulative emissions and respective capabilities, to lead the way by reducing greenhouse gas emissions by at least 50% and preferably 70% by 2030 and to near zero by 2040. The analysis should include a calculation of baseline emissions from federal and non-federal fossil fuels as well as projections at key interim goals of 2030 and midcentury.

For example, a linear decline of federal fossil fuel production emissions from 1.332 GtCO₂e per year¹ to zero emissions in 2040 would yield a carbon budget for remaining federal fossil fuel production of about 12.65 GtCO₂e from 2021–2040. The Department's analysis should ensure that the potential greenhouse gas pollution from any new federal fossil fuel leasing and production, in combination with that from existing federal and non-federal fossil fuel leases and production, is compatible with a fair U.S. share of a global carbon budget for meeting the goal of limiting climate change to 1.5 degrees Celsius. It should also account for the distinct plenary authority Interior holds over the public lands fossil fuels program. Interior's authority is, put simply, expansive, suggesting excellent opportunities for the Biden administration, consistent with its "whole of government" approach, to deepen and maximize emissions cuts on public lands given more limited authorities relative to other carbon emitting sectors. *See Kleppe v. New Mexico*, 426 U.S. 529 (1976).

c. Incorporate Social Costs as Part of the Climate Analysis

Once the Department quantifies the *amount* of the greenhouse gas emissions associated with the alternatives it identifies, it should also assess the *impact* that those emissions have on the environment and the climate. One available tool for such analysis, as explained above, is to employ a carbon budget analysis. The social cost of carbon, methane, and nitrogen oxide protocols provide the Department with an additional and complementary tool to help analyze and contextualize the impacts of competing alternatives for federal fossil fuel management.

These protocols are available, scientifically valid, and peer-reviewed. They allow Interior to monetize the costs associated with incremental increases in greenhouse gas emissions and thereby provide an estimate of the economic damage, in dollars, caused by each incremental ton of carbon dioxide and methane, respectively, emitted into the atmosphere, including impacts such as changes in net agricultural productivity, property damage from increased flooding, natural disasters, disruption of energy systems, risk of conflict, environmental migration, and

¹ Merrill, M.D., Sleeter, B.M., Freeman, P.A., Liu, J., Warwick, P.D., and Reed, B.C., 2018, Federal lands greenhouse 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>.

human health impacts, among others.² By translating climate impacts, and tons of greenhouse gasses in particular, into dollars, the social cost of carbon and social cost of methane offer Interior an easy to use and easy to understand tool that would allow the public and decisionmakers to better understand the climate impacts of federal land management alternatives.

Developed by more than a dozen federal agencies and offices in 2010, the Interagency Working Group on the Social Cost of Greenhouse Gases' (IWG) social cost of carbon protocols have been updated multiple times to reflect the latest scientific understanding. Most recently, the federal Interagency Working on the Social Cost of Greenhouse Gases republished its prior figures for the social costs of carbon dioxide, methane, and nitrous oxide and stated its intent to update its analysis and the resulting social cost figures in January 2022.³ Interior should use these recently-published values, which even the IWG acknowledges “likely underestimate societal damages from [greenhouse gas] emissions,”⁴ but should similarly update its analysis during the PEIS process to reflect the most recent IWG figures available.

d. Analyze Market Substitution Effects of Alternatives Across Fossil Fuels

In its upcoming environmental review, Interior must address the key climate question: how changes in the amount of federal fossil fuels available for leasing and production changes greenhouse gas emissions. Without this information, neither the public nor decisionmakers can adequately understand the climate impacts of the competing alternatives under consideration.

Here, because federal fossil fuels compete with one another, with state and privately-held fossil fuels, and with renewal resources in the marketplace, BLM's alternatives and its analysis must address all fossil fuels—including coal, oil, and gas. At the same time, fossil fuels are produced where the resource is, straddling expansive regions of checkerboarded federal, Tribal, state, and private lands. NEPA requires federal agencies to study and disclose the effects of their decisions and to provide a clear basis for choice among alternatives. 42 U.S.C. §§ 4332(2)(C), 4332(2)(E). Here, the Department must analyze and disclose the difference in greenhouse gas emission levels between alternatives when considering large-scale changes to federal fossil fuel management.

In the U.S. energy market – where coal, natural gas, wind, solar, and nuclear all compete for market share, where utilities can choose among these competing options on an on-going basis, and where utilities and grid operators can quickly alter the rates at which these commodities are

² Interagency Working Group on Social Cost of Greenhouse Gases, Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide: Interim Estimates Under Executive Order 13990, at 2 (2021). https://www.whitehouse.gov/wp-content/uploads/2021/02/TechnicalSupportDocument_SocialCostofCarbonMethaneNitrousOxide.pdf.

³ *Id.* at 4, 11.

⁴ *Id.* at 4. The IWG interim figures underestimate the impact of carbon pollution because the underlying models are not based on the current climate science literature and do not take into account all impacts of carbon pollution, and use a discount rate higher than is appropriate. See, e.g. National Academies of Sciences, Engineering, and Medicine 2017. Valuing Climate Damages: Updating Estimation of the Social Cost of Carbon Dioxide. Washington, DC: The National Academies Press. <https://doi.org/10.17226/24651>; Carleton, Tamma and Greenstone, Michael, Updating the United States Government's Social Cost of Carbon (January 14, 2021). University of Chicago, Becker Friedman Institute for Economics Working Paper No. 2021-04, available at <https://ssrn.com/abstract=3764255>; Peter Howard, Omitted Damages: What's Missing From The Social Cost Of Carbon (2014), available at http://costofcarbon.org/files/Omitted_Damages_Whats_Missing_From_the_Social_Cost_of_Carbon.pdf.

utilized – price, supply, and demand interact in predictable ways. Economic demand is not a fixed threshold that suppliers of a commodity will necessarily rise to meet; it is instead a relationship among economic parameters that ultimately lead to certain levels of consumption.⁵ As you restrict the supply of a good, price increases, and this in turn affects demand. As explained by Judge Posner, these “straightforward, intuitive premises” dictate that “[i]f quantity falls, price will rise . . . [i]f price rises, quantity falls because consumers buy less of the good.”⁶

Multiple federal appellate courts have recognized these basic economic principles and required agencies to analyze the connection between market changes and climate impacts, including several that address analysis by agencies within the Department of Interior. *See, e.g., Center for Biological Diversity v. Bernhardt*, 982 F.3d 723, 740 (9th Cir. 2020) (BOEM improperly ignored market effect on foreign oil consumption); *Sierra Club v. FERC*, 867 F.3d 1357, 1375 (D.C. Cir. 2017) (FERC arbitrarily ignored market analysis of pipeline proposal and corresponding climate impact); *WildEarth Guardians v. BLM*, 870 F.3d 1222, 1237 (10th Cir. 2017) (BLM arbitrarily assumed perfect market substitution for federal coal lease approvals).

As part of its upcoming environmental review, Interior should identify the available economic models and utilize the model or models that can best inform its analysis. Several possible models (by no means an exhaustive list), are noted below. The Department of Energy has a computer model created by the Energy Information Administration (EIA) referred to as the National Energy Modeling System (NEMS). NEMS is an energy-economy model that projects future energy prices, supply, and demand and can be used to isolate variables such as changes in coal supply and variations in delivered coal price.⁷ ICF International’s Integrated Planning Model has been used to evaluate market responses to numerous federal proposals, including the following projects: EPA, Clean Power Plan; State Department, Keystone XL Pipeline; Surface Transportation Board, Tongue River Railroad; U.S. Forest Service, Colorado Roadless Rule; Washington Department of Ecology, Millennium Bulk Export Terminal. Similarly, Interior’s Bureau of Ocean Energy Management (BOEM) has long used a market simulation model to analyze market substitution effects. *See, CBD v. Bernhardt*, 982 F.3d at 736 (“BOEM used a market-simulation model to predict the greenhouse gas emissions for energy sources that would substitute for the oil not produced at Liberty.”).

e. Evaluate a Finding of Atmospheric and Climate Impairment and Undue Degradation Pursuant to FLPMA

On the basis of the carbon budget compatibility analysis recommended above, the review should evaluate the extent to which any additional greenhouse gas pollution from existing and future federal fossil fuels production, in combination with non-federal fossil fuel production, would result in permanent impairment and undue degradation of the atmosphere and climate, the productivity of the land, and the quality of the environment. Such a finding furthers and conforms to existing statutory authority in the Federal Land Policy and Management Act of 1976 (FLPMA). Specifically, FLPMA provides that Interior must:

⁵ Richard Posner, *ECONOMIC ANALYSIS OF THE LAW*, at 5-6 (9th Ed. 2014).

⁶ *Id.*

⁷ EIA, *National Energy Modelling System: An Overview*, at 1 (2009).

- Protect “air and atmospheric,” “water resource,” “ecological, environmental,” and “scenic,” values, “certain public lands in their natural condition,” and “food and habitat for fish and wildlife” (43 U.S.C. § 1701(a)(8));
- Account for “the long-term needs of future generations” (43 U.S.C. § 1702(c));
- Prevent “permanent impairment of the productivity of the land and quality of the environment” 43 U.S.C. § 1702(c); and
- “[T]ake any action necessary to prevent unnecessary or undue degradation of the lands.” 43 U.S.C. § 1732(b).

NEPA provides a procedural vehicle to not only make these findings, but to interpret and leverage FLPMA’s full capability to address the climate crisis and its confluence with our public lands and the mineral resources under Interior’s purview. Adherence to NEPA’s action-forcing statutory and regulatory mandates helps achieve NEPA’s noble purpose and policies, such as to “fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.” 42 U.S.C. §§ 4331(b)(1); *see also* 42 U.S.C. §§ 4321, 4331. We emphasize that NEPA directs, “to the fullest extent possible ... the policies, regulations, and public laws of the United States shall be interpreted and administered in accordance with the policies set forth in this Act.” 42 U.S.C. § 4332(1). Put differently, Interior, through its review, must meet its duty as a trustee for future generations.

Consistent with the recommendations and authorities articulated above, Interior should evaluate a managed and orderly phase-out of federal fossil fuel leasing and production using these mechanisms and authorities:

- *Withdrawing Federal Fossil Fuels from Eligibility for Leasing*: FLPMA provides the Secretary authority to make public land ineligible for federal fossil fuel leasing by a formal “withdrawal” from leasing availability for up to 20 years. *See* 43 U.S.C § 1714.
- *Prohibiting Leasing Through Resource Management Plan Amendments*: FLPMA provides Interior with the authority, through the PEIS, to amend existing resource management plans nationwide to make public lands unavailable for new federal fossil fuel leasing to safeguard the climate and other resources and values. *See* 43 U.S.C § 1702(c) (BLM is charged with “making the most judicious use of the land for some or all of [multiple uses]”); *New Mexico ex rel. Richardson v. Bureau of Land Management*, 565 F.3d 683, 710 (10th Cir. 2009) (holding that “an alternative that closes [public lands] to development does not necessarily violate the principle of multiple use, and the multiple use provision of FLPMA is not a sufficient reason to exclude more protective alternatives from consideration”).
- *Constraining Development of Existing Leases to Safeguard the Climate, Public Lands, and Communities*: FLPMA directs Interior to safeguard air and atmospheric resources and to prevent permanent impairment as well as unnecessary and undue degradation of public lands. *See* 43 U.S.C. §§ 1701(a)(8), 1702(c), 1732(b). We contend that the approval of new fossil fuel infrastructure or development on public lands cannot be justified in fact or law given climate and other harms. Regardless, Interior should further these directives by developing

mandatory conditions of approval to be applied during the review of proposed new oil and gas wells, infrastructure, spacing determinations, unitization agreements, or rights of way as well as decisions to extend the life of non-producing leases or aging infrastructure.

- *Managing an Orderly Decline of Production Rates Onshore Under MLA:* In accord with the Mineral Leasing Act, the Secretary may reduce the rate of production over a defined period of time, limiting the amount of extraction and greenhouse pollution that would result. MLA allows the Secretary of the Interior to “alter or modify from time to time the rate of prospecting and development and the *quantity and rate of production under such plan.*”⁸ Likewise, nearly all BLM leases for onshore oil and gas contain a clause which states that “Lessor reserves the right to specify rates of development and production in the public interest.” *See* U.S. Department of the Interior, *Offer to Lease and Lease for Oil and Gas*, Form 3100-11 (Oct. 2008). In these ways, the Secretary can set forth a declining rate of production over time that can, alongside transition measures, accommodate lease rights but provide for an orderly phase-out of fossil onshore fossil fuel production.
- *Prohibiting Offshore Federal Fossil Fuel Leases, Lease Suspensions and/or Cancellation, and Managing a Decline of Production Rates:* Interior should consider revising the National Outer Continental Shelf Oil and Gas Leasing Program in a manner that halts new offshore oil and gas lease sales and provides a determination that “national energy needs” require a prompt transition away from fossil fuels and an end to offshore oil and gas leasing. *See* 43 U.S.C. § 1344(a). The review should also fully consider the exercise of authority to suspend and/or cancel offshore leases based on “harm or damage to life, property, any mineral, national security or defense, or the marine, coastal, or human environment.” 43 U.S.C. § 1334(a). Interior should prepare a plan to phase out oil and gas activities on the Outer Continental Shelf, including a ban on drilling new wells, suspension and cancellation of existing leases, and a managed decline of production. For this, OCSLA provides: “The lessee shall produce any oil or gas, or both, obtained pursuant to an approved development and production plan, *at rates consistent with any rule or order issued by the President in accordance with any provision of law.*”⁹

2. The Department Should Initiate a Rulemaking Process to Fulfill FLPMA’s Promise and Ensure Durable Climate and Public Lands Action

Above, we noted several key FLPMA statutory authorities. Remarkably, and with the exception of hardrock mining rules, the Department has never promulgated rules that specifically implement these authorities, let alone in the context of the climate crisis and the public lands oil and gas program. This dynamic has created a problematic asymmetry in Interior’s planning and management framework that favors fossil fuels at the expense of FLPMA’s other enumerated resources and values, including “air and atmospheric” values and the myriad conservation values, such as water and wildlife, found and dependent on public lands.

Accordingly, we recommend that Interior, concurrent and integrated with the PEIS, promulgate rules that implement FLPMA’s statutory directives to, *inter alia*, protect “air and atmospheric”

⁸ Section 17(b) of the MLA.

⁹ Section 5(g)(1) of OCSLA.

values, account for “the long-term needs of future generations”, prevent “permanent impairment”, and “prevent unnecessary or undue degradation.” 43 U.S.C. §§ 1701(a)(8)), 1702(c) 1732(b). Such rules would provide the Department with a durable, clear, and enforceable framework to take climate action and rationally connect facts found through the PEIS with substantive choices regarding the future of the public lands oil and gas program.

3. The Department of Interior Must Comply with the Endangered Species Act’s Consultation Requirement as Part of the Review

All Interior agencies are obligated to conserve species listed under the Endangered Species Act (“ESA”), 16 U.S.C. § 1536. Under section 7 of the ESA, federal agencies must “insure that any action authorized, funded, or carried out by such agency ... is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined ... to be critical.” 16 U.S.C. § 1536(a)(2). Congress enacted the ESA in 1973 to provide for the conservation of endangered and threatened fish, wildlife, plants and their natural habitats and to “halt and reverse the trend toward species extinction, *whatever the cost*.”¹⁰

The ESA imposes both substantive and procedural obligations on all federal agencies with regard to listed species and their critical habitats.¹¹ Any decision by BLM or BOEM at the completion of the review set forth in Executive Order 14008 of January 27, 2021, constitutes a discretionary “agency action” within the ESA’s statutory and regulatory definition of those terms.¹² Because the direct, indirect, and cumulative effects of the review will cross the very low “may affect” threshold for hundreds of species listed under the ESA, BLM and BOEM must consult with both the U.S. Fish and Wildlife Service and National Marine Fisheries Service (collectively “the Services”) to ensure that any resumption of federal oil and gas leasing will not jeopardize listed species or adversely modify their critical habitat.¹³

Because of the programmatic nature of the review that would be carried out by the Department, the action agencies must initiate programmatic consultations¹⁴ with the Services at the earliest possible time.¹⁵ This programmatic consultation must address two critical types of harms that occur to listed species: (1) landscape level impacts that occur to listed species that are found within the action area of the existing footprint of possible and existing fossil fuel leasing and

¹⁰ *Id.* at 184 (emphasis added).

¹¹ *See, Thomas v. Peterson*, 753 F. 2d 754 (9th Cir. 1985) (“If anything, the strict substantive provisions of the ESA justify more stringent enforcement of its procedural requirements, because the procedural requirements are designed to ensure compliance with the substantive provisions.”)

¹² *See* 50 C.F.R. 402.02 (“action means all activities or programs of any kind authorized, funded, or carried out, in whole or in part, by Federal agencies in the United States or upon the high seas. Examples include, but are not limited to: (a) actions intended to conserve listed species or their habitat; (b) the promulgation of regulations; (c) the granting of licenses, contracts, leases, easements, rights-of-way, permits, or grants-in-aid; or (d) actions directly or indirectly causing modifications to the land, water, or air.”).

¹³ *Karuk Tribe of California v. U.S. Forest Service*, 681 F.3d 1006 (2012); *American Fuel & Petrochemical Manufacturers, et al. v. EPA*, 937 F. 3d 559 (D.C. Cir. 2019) (A finding that “it is impossible to know” an agency action will affect listed species or critical habitat “is not the same as” a no effect determination.).

¹⁴ *See generally, Incidental Take Statements*, 80 Fed. Reg. 26832 (May 11, 2015).

¹⁵ *See*, §402.14 (“Each Federal agency shall review its actions at the earliest possible time to determine whether any action may affect listed species or critical habitat. If such a determination is made, formal consultation is required, except as noted in paragraph (b) of this section.”).

development; and (2) geographically-remote impacts to listed species that are harmed from climate change and other pollution impacts. Because fossil fuel extraction from public lands and waters represents 25% of all U.S. emissions, and therefore represent a globally significant percentage of all emissions, the impacts to climate-threatened listed species and their habitats is appreciable, significant, and must be assessed under the ESA's consultation framework. This meaningful analysis of these impacts would be consistent with President Biden's Executive Order 13990, which states that all federal agencies "must be guided by the best science and be protected by processes that ensure the integrity of Federal decision-making."¹⁶

4. Recommendations for Timing, Public Outreach, and Engagement

To encourage robust and transparent public notice, comment, and engagement, we support:

- A minimum 90-day public comment period accompanying public hearings (virtual or otherwise) in regions impacted by federal fossil fuel management and the climate crisis, including but not limited to the Gulf, the American Southwest, the central Rockies, the northern Great Plains, the West Coast, Utah, Alaska, New York City, Miami, New Orleans, and Puerto Rico.
- Interior's robust government-to-government consultation with Tribes in connection to the forthcoming PEIS. We urge Interior to consider, subject to Tribal needs and concerns, a separate PEIS specific to Tribal resources under Interior's purview.
- Interior deploys a website that provides information, data, and updates relevant to the PEIS over the course of its preparation. This website should, at a minimum: (1) provide an opportunity for the public to provide their e-mail address to receive updates; (2) provide supporting reports as they are developed; (3) provide GIS and other data relevant to the PEIS; (4) provide public notice of public hearings or of the availability of key documents; and (5) provide access to all comments submitted.
- The PEIS is completed and the record of decision is issued by February 2023. This timeline is expeditious but reasonable, ensuring swift implementation of action before the end of this administration's first term. Although we understand that such commitments are often eschewed by federal agencies, given the stakes involved, namely the future of many communities, the fate of our climate, justice, the patience of the public, and integrity of our energy systems, we believe that offering this commitment is a reasonable request.

Thank you for your consideration. Please do not hesitate to contact us with questions or for further discussion.

¹⁶ See, *Executive Order 13990 of January 20, 2021: Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis*, 86 Fed. Reg. 7037 (Jan. 25, 2021).

Sincerely,



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