

November 1, 2016

The President
The White House
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

The Honorable Sally Jewell
Secretary of the Interior
1849 C Street, N.W.
Washington, DC 20240

Re: BLM Plan for Western Colorado Can Be a Model for Climate Action

Dear Mr. President and Madam Secretary:

Climate change is the pre-eminent environmental peril of our time, threatening our communities, our rivers and agricultural lands, our health and our way of life. Your administration has recognized this threat and has played a leadership role in the U.S. and around the world in reducing greenhouse gas emissions.

In western Colorado, the Bureau of Land Management (BLM) has an opportunity to tackle the issue as it considers new options to manage coal, oil and natural gas production in the Uncompahgre planning area. The Uncompahgre Resource Management Plan addresses approximately 675,000 acres of BLM-administered land and almost a million acres of federal minerals in southwestern Colorado. This region supports exceptional outdoor recreation, Colorado's largest concentration of organic agriculture, and numerous threatened and endangered species, including Colorado pikeminnow, razorback sucker, greenback cutthroat trout, and Gunnison sage-grouse. The area also includes four coal mines – including one permanently closed, one idle, and one slated for closure in 2022. While oil and gas interests have proposed hydraulic fracturing in the area, those proposals have sparked significant local opposition which together with low prices have thus far suppressed much of the would be development.

Unfortunately, every option BLM is considering in its draft plan for that area will worsen, not reduce, climate pollution. In fact, over the 20-year life of the plan, BLM predicts that fossil fuel development and combustion could result in over a half a billion tons of additional climate pollution—about the equivalent of running the state's five largest coal-fired power plants. BLM should be part of the climate solution, not part of the problem. BLM's failure to even consider options that reduce the agency's contribution to climate pollution is contrary to your administration's policy and common sense.

We therefore urge you to ensure that BLM gives meaningful consideration to alternatives that end new fossil fuel leasing of lands and minerals managed by the Uncompahgre Field Office. BLM's new plan for the Uncompahgre region presents an important opportunity for the

Department of Interior to avoid substantial greenhouse gas emissions while protecting important natural resources at stake in Colorado's North Fork Valley.

The United States has committed to the climate goal of holding the increase in the global average temperature to “well below 2°C above pre-industrial levels” and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels under the Paris Agreement. Limiting further temperature rise is necessary to prevent increasingly dangerous and potentially irreversible impacts. However, current climate policy and emissions reduction pledges in the United States and globally are not sufficient to achieve a 1.5°C or 2°C limit, and stronger action to reduce greenhouse gas emissions is urgently needed.

As you have stated, Mr. President, “ultimately, if we're going to prevent large parts of the Earth from becoming not only inhospitable but uninhabitable, then we're going to have to keep some fossil fuels in the ground rather than burn them.” According to a large body of scientific research, holding temperature rise to “well below 2°C” requires that the vast majority of global and U.S. fossil fuels stay in the ground. The global carbon budget—the remaining amount of carbon that can be released into the atmosphere before we lose any reasonable chance of holding global temperature increases well below 2°C—is extremely limited and rapidly being consumed by continued fossil fuel use. Over the past decade, the burning of fossil fuels from federal leases has resulted in nearly a quarter of all U.S. energy-related emissions and nearly four percent of global emissions. Ending new leases for federally-managed fossil fuels would have a significant effect on U.S. emissions, and would signal a serious commitment to meeting emissions targets by controlling not only fossil fuel consumption but also production and infrastructure. Moreover, a recent study by Oil Change International entitled *The Sky's Limit*, shows that meeting the Paris climate goals requires a managed decline in *currently operating* fossil fuel production activities, such as coal, oil and gas extraction, transport and combustion. Specifically:

- The potential carbon emissions from the oil, gas, and coal in the world's currently operating fields and mines would take us beyond 2°C of warming.
- The reserves in currently operating oil and gas fields alone, even with no coal, would take the world beyond 1.5°C.

Based on these findings, the report recommends: “No new fossil fuel extraction or transportation infrastructure should be built, and governments should grant no new permits for them.” The science is clear that the path to avoiding the worst impacts of climate change involves ending business as usual for fossil fuel development. Indeed, as the *Oil Change* report points out, “if you are in a hole, stop digging.”

We commend the Department of Interior on its initiatives to begin addressing the role of federal fossil fuel leasing and production in the climate crisis, including its historic programmatic review of the federal coal leasing program and its efforts to address methane emissions from oil and gas production on federal lands. The plan for the Uncompahgre Planning Area offers the Department an exceptional opportunity to begin integrating the United States' climate goals into its local plans for managing public lands and mineral estates. In particular, the combination of already-declining coal production and the lack of substantial existing oil and gas infrastructure in the

region present an opportunity for significant emissions savings without a major stranding of investments or loss of employment.

BLM's draft plan for the Uncompahgre area, however, proposes *expanding* fossil fuel leasing and development above historic levels, and the agency fails to address options that limit climate pollution in any meaningful way. BLM rejects any consideration of alternatives that would close the planning area to either coal or oil and gas leasing. Every one of its alternatives contemplates levels of fossil fuel leasing and production that would result in increased greenhouse gas emissions over current levels. BLM's failure to analyze alternatives that would restrict fossil fuel development is all the more arbitrary given that BLM considers prohibiting renewable energy development—including wind and solar—on 95% of the resource area.

Further, despite administration policies that require both quantitative and qualitative disclosure of climate emissions and consideration of alternatives and mitigation measures that would reduce climate impacts, the Uncompahgre draft environmental impact statement fails to disclose or consider available mitigation measures to reduce the climate impacts of additional coal, oil and gas development.

The BLM has an incredible opportunity to develop a “gold standard” in resource management that helps combat the climate crisis while providing a path to sustainable development in a region of Colorado that is eager to transform its economic base. Therefore, we urge you to direct BLM to prepare a revised plan and environmental analysis—one that incorporates U.S. Paris Agreement climate goals by adding emissions reduction to its purpose and need, analyzes an alternative that would prohibit new fossil fuel leases, and that recommends the area for long-term withdrawal from availability for mineral leasing. Thank you for your consideration.

Sincerely,

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