

Anita Bilbao
Acting State Director
Bureau of Land Management Utah

CC: The Honorable David Bernhardt
Secretary
Department of Interior
1849 C St., NW
Washington, DC 20240

April 17, 2020

Dear Acting Director Bilbao,

On March 6, 2020, Governor Gary H. Herbert declared a state of emergency in Utah. Less than a month later, on April 4, President Trump reinforced these concerns by declaring a major disaster in Utah because of the pandemic. Due to the COVID-19 health crisis affecting the United States and the State of Utah, we request the Bureau of Land Management (BLM) suspend all open public comment periods and not initiate new comment periods for rulemakings until these emergencies have passed. BLM should also suspend comment periods for oil and gas lease sales and other industry proposed actions. Tasked primarily with managing public lands, natural and cultural resources, and the environment of Utah, the BLM should not be adding to the burden faced by the communities of Utah as they endeavor to protect their health, safety, and livelihoods.

We represent Utah's diverse body of conservation and environmental advocacy organizations speaking for tens of thousands of concerned Utahns. Our communities and state are reprioritizing resources, funding, staff, and capacity to slow the spread of COVID-19 and minimize negative impacts on working and living conditions. The COVID-19 pandemic has not yet "peaked" in Utah, but already the ability of Utahns to respond to public comment opportunities is being challenged.

Utahns value participating in decisions that affect their day-to-day lives and environment. That's why the BLM needs to pause active and proposed public comment periods as listed on the Federal Register and Regulations.gov, ePlanning, Planning, Environment & Public Comment (PEPC), and other platforms. Ease of access to comment periods is not the same across our state as not all communities can engage equally in online, remote public comment opportunities. Equitable access and opportunity to engage in public comment periods will be particularly challenging for communities without reliable internet access. In Utah, unreliable internet is most experienced in rural communities who stand to see the most significant impacts from proposed projects and rulemakings. Additionally, residents throughout the state are facing new hardships by the need to care for their lives and the lives of others. In the day and age of COVID-19, what should be a democratic process for receiving public input is not open and accessible to all.

Our organizations are particularly concerned that state and federal agencies- like the BLM- regulating public health, lands, environment, natural and cultural resources, and wildlife may move ahead with decisions and rulemakings during a national emergency without adequate public participation. For example, the protest period for the Utah-BLM June 2020 lease sale is scheduled to begin April 23, in the midst of the pandemic. We seek to ensure that decision-making processes concerning public lands in Utah are protected throughout this pandemic, not undermined or dismantled.

We respectfully request that all open and planned comment opportunities, including comment periods that closed after March 13, 2020, be suspended until the pandemic subsides. We also ask that this letter be included in the official agency records relating to public involvement. We appreciate your willingness to accommodate the interests and abilities of the public at large by ensuring that all will have the opportunity to engage in these open public opportunities.

Thank you for your consideration. Please provide a written reply to confirm you received our notice to Carly Ferro, Director of the Utah Sierra Club at 423 W 800 S Suite A103, Salt Lake City, UT 84101. If you have any questions, information, or concerns, please contact Carly at carly.ferro@sierraclub.org.

Signed,

William H. Doelle, President and CEO
Archaeology Southwest

Ryan Beam, UT Public Lands Campaigner
Center for Biological Diversity

Sarah Thomas, Land Program Manager and
SUNCLF Director
Conserve Southwest Utah

Sarah Bauman, Executive Director
Grand Staircase Escalante Partners

Josh Ewing, Executive Director
Friends of Cedar Mesa

Sarah Stock, Program Director
Living Rivers & Colorado Riverkeeper

Erika Pollard, Associate Director, Southwest
Region
National Park Conservation Association

Carly Ferro, Director
Utah Chapter of the Sierra Club

Brooke Larsen, Coordinator
Uplift

Gavin Noyes, Executive Director
Utah Diné Bikéyah

Scott Groene, Executive Director
Southern Utah Wilderness Alliance