



April 13, 2020

*Submitted via [eplanning.blm.gov](http://eplanning.blm.gov)*

U.S. Department of the Interior  
Bureau of Land Management  
Attention: WO-210-PJCX  
20 M Street SE, Room 2134LM  
Washington, DC 20003

**Re: National Environmental Policy Act Implementing Procedures for the Bureau of Land Management (516 DM 11)**

Dear Sir/Madam:

Western Energy Alliance strongly supports the Bureau of Land Management's (BLM) proposed revisions to its National Environmental Policy Act (NEPA) implementing procedures. The addition of a categorical exclusion (CX) for pinyon pine and juniper tree (PJ) removal is necessary for expedited maintenance of sagebrush habitats and fully supported by the science in the Verification Report accompanying the proposal. We urge BLM to expeditiously finalize the proposed rule.

Western Energy Alliance represents over 300 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas across the West. The Alliance represents independents, the majority of which are small businesses with an average of fourteen employees.

The NEPA process has become far removed from its original intent, as passed by Congress, to provide decision makers with better information to enable more environmentally sensitive federal projects. In practice, NEPA has instead become a cumbersome process that often requires lengthy reviews that ultimately do not serve the purpose of further informing agency decision makers.

Categorical exclusions provide for expedited review of projects that are known to be environmentally beneficial without requiring an environmental assessment (EA), which can often take months or even years to complete. A CX documents that BLM has considered the environmental impacts of a project and found that a more extensive review under an EA is not required. These projects benefit the environment without necessitating mitigation of other impacts.

In light of the extensive science that has been documented in the BLM Pinyon Pine and Juniper Management Categorical Exclusion Verification Report, it is clear that a CX for PJ removal is appropriate and necessary. Clearing PJ has been one of the most effective ways

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to restore sagebrush habitat and protect sage grouse and mule deer, among other species. The State of Utah's [habitat restoration plan](#) has been especially effective, and it's widely recognized that halting PJ encroachment is effective conservation.

We strongly support the proposed CX for pinyon pine and juniper tree removal, and urge BLM to finalize the proposal. Please do not hesitate to contact me with any questions.

Sincerely,



Tripp Parks  
Vice President of Government Affairs