



March 25, 2020

The Honorable Mark Gordon
Governor of Wyoming
Wyoming State Capitol Building
Cheyenne, WY 82001
Via electronic mail

RE: Request for pause in all open state agency comment periods during COVID-19 pandemic

Dear Governor Gordon:

On behalf of our members, Powder River Basin Resource Council and Wyoming Outdoor Council ask you to issue an order suspending all deadlines for public comments to state agencies in Wyoming. We appreciate all you have done to address the COVID-19 pandemic, and believe such an order would be consistent with your previous orders and guidance for Wyomingites to limit travel and minimize risk to themselves and others from the coronavirus that causes COVID-19.

Our organizations and our members are currently working on drafting comments to meet deadlines for public comments from a variety of state agencies, including notably the Wyoming Department of Environmental Quality (DEQ). While some permit documents and rulemaking proposals that are the subject of open comment periods are available online, not all documents are. Additionally, many in our state have limited access or no access to high-speed internet, and with libraries shutdown as well, access to paper documents at state agency offices is needed to fulfill comment period requirements.

We have concern for state agency employees if members of the public are visiting document reading rooms to access the documents that are the subject of open comment periods. Many local government offices have closed to public access to restrict visitors and limit risk of virus transmission.

If comment periods stay open, we urge you to order state agencies to accept all comments by electronic mail or otherwise work to provide more electronic access to facilitate commenting and reviewing state agency documents online. Our organizations have long supported the transition to electronic permitting as a means to facilitate public participation in state government, and to facilitate greater transparency and access to public records. However, for the concerns noted above, our organizations have also always advocated for electronic permitting and commenting to supplement, not supplant, written comments and paper documents that are still needed by some Wyomingites.

Thank you for your considering our request and we look forward to receiving a prompt response.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Anderson", with a long horizontal flourish extending to the right.

Shannon Anderson
Staff Attorney
Powder River Basin Resource Council
934 N. Main St., Sheridan, WY 82801
sanderson@powderriverbasin.org

John Rader
Conservation Advocate
Wyoming Outdoor Council
262 Lincoln St., Lander, WY 82520
john@wyomingoutdoorcouncil.org

cc (via electronic mail): Todd Parfitt (WDEQ), Colin McKee (WDEQ), Brian Nesvik (WGFD), Jenifer Scoggin (OSLI), Mark Watson (WOGCC), Renny MacKay, Beth Callaway