



October 25, 2023

The Honorable Vanessa Countryman
Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

Re: SR–NYSE–2023–09 Notice of Filing of Proposed Rule Change to Amend the NYSE Listed Company Manual to Adopt Listing Standards for Natural Asset Companies

Dear Secretary Countryman:


We write today to respectfully request a 90-day extension of the comment period for SR–NYSE–2023–09.


This rule has wide-ranging implications for the citizens of our states, specifically in our natural resources and agricultural industries. A 21-day period is entirely insufficient to appropriately review and comment on a rule of this magnitude. Furthermore, it is difficult to understand why the Departments of the Interior and Agriculture have not been involved with rolling out this rule, given its impact to public lands, national forests, and other federal, state, local, and tribal land uses.


In short, this seems to be a subverted, back door approach to apply Environmental, Social and Governance (ESG) principles to land use and management. This is concerning and requires additional time for careful review by states and the public to analyze its impacts. Please grant an extension of 90 days so we can review this rule properly.

Sincerely,


Greg Gianforte
Governor of Montana


Joe Lombardo
Governor of Nevada


Brad Little
Governor of Idaho


Mark Gordon
Governor of Wyoming