

June 20, 2023

Tracy Stone-Manning  
Director of the Bureau of Land Management  
Department of the Interior  
1849 C Street NW  
Washington, DC 20240

**Re: Aligning BLM onshore oil and gas program with U.S. climate goals**

Dear Director Stone-Manning:

On behalf of our millions of members and supporters, we thank you for the process you are leading to develop rules to protect public lands, preserving them for conservation, recreation, cultural heritage, and other valuable uses to be enjoyed for generations to come.

We ask you to take another important step: to reform the federal oil and gas program by aligning it with the Biden Administration's climate, conservation, and environmental justice goals. The upcoming rulemaking proposing reforms to BLM's oil and gas procedures provides a prime opportunity to take such a step. It is critical to release the proposed rule in order to implement vital programmatic reforms, and action to reduce climate impacts should be part of them.

Currently, an astounding 90 percent of lands administered by the Bureau of Land Management (BLM) are available for oil and gas leasing, and fossil fuel extraction from federally managed lands and waters undercuts the Administration's emission reduction targets and its goal of conserving 30 percent of U.S. lands and waters by 2030. Meanwhile, the science is clear: to meet our conservation, climate, and justice goals, we must aggressively reduce fossil fuel leasing and drilling on public lands and waters. As the Intergovernmental Panel on Climate Change (IPCC) recently warned, projected CO2 emissions from existing fossil fuel infrastructure--without additional abatement--will exceed the remaining carbon budget for a 1.5°C future. The International Energy Agency has reiterated this reality in recent years, noting that to achieve global net zero by 2050, "no new oil and natural gas fields are required beyond those that have already been approved for development. No new coal mines or mine extensions are required." As a major source of oil, gas, and coal, public lands must become a part of the climate solution rather than a large part of the problem.

Public lands and waters play a valuable role in addressing the ongoing conservation and climate crises. They provide a variety of benefits, such as habitat connectivity, outdoor recreation, cultural resource protection, livestock grazing, and essential ecosystem services. They also comprise critical natural infrastructure to buffer communities against the effects of a changing climate, support carbon sequestration, renewable energy, and connection to nature with the robust physical and mental health benefits it provides. Continuing to principally develop these lands for fossil fuel infrastructure harms the health and well-being of nearby communities while contributing to the climate crisis. In addition to its major climate impacts, the oil and gas produced on federal lands results in air and water pollution that afflicts marginalized and low-income communities, in particular, when it is transported, refined,

and exported. In findings published in May 2023, a team led by experts at Boston University found that air pollution from the oil and gas sector in the U.S. resulted in 2,200 new cases of childhood asthma, 410,000 asthma exacerbations, and 7,500 excess deaths per year.[1] The study concluded that oil and gas production in the U.S. costs Americans \$77 billion in annual health care costs, including respiratory and cardiovascular-related hospitalizations, adverse pregnancy outcomes, and other health challenges—all of which are suffered and paid for by community members instead of oil and gas executives.

The Department of the Interior (DOI) is tasked with safeguarding America's public lands and cultural heritage, increasing environmental protections, pursuing environmental justice, and honoring our nation-to-nation relationship with Tribes. Nevertheless, for decades, the federal government has given handouts to oil and gas companies that harm the health of our environment, wildlife, and communities. Despite the major progress the Biden administration is making on other fronts to meet the climate crisis, it is still digging the hole deeper when it comes to oil and gas on public lands and waters. The recent strong public opposition to the decisions to approve the massive Willow oil and gas project in the Western Arctic and expand leasing in the Gulf of Mexico reflects the widespread rejection of business as usual. An update to the federal fossil fuel leasing and permitting programs that require oil and gas decisions to align with this nation's climate commitments is long overdue.

With President Biden's leadership, Congress recently passed the Inflation Reduction Act (IRA) – which includes several important updates to the onshore oil and gas program – and the Bipartisan Infrastructure Law, which invests billions in clean energy infrastructure. Collectively, these two laws are predicted to lead to a 40 percent reduction in domestic climate emissions by 2030. While this is a historic achievement, the U.S. still needs an additional 10 percent reduction to meet President Biden's commitment to cut emissions in half by 2030.

The federal oil and gas program provides a significant opportunity to close that gap: almost half of the remaining 10% in national climate emissions reductions still needed by 2030 could come from strong and defensible action to limit new oil and gas leasing and drilling on public lands and waters. Restrictions on new oil and gas drilling and infrastructure are crucial to reducing carbon pollution while complementing provisions in the IRA aimed at supporting and incentivizing a clean energy future. The Administration has direct authority under the Mineral Leasing Act (MLA), the Federal Land Policy and Management Act (FLPMA), and other laws to take such action by requiring that federal leasing and drilling align with the Biden Administration's climate goals— goals strongly supported by seven out of ten Americans.

To scale down carbon pollution and ensure that action is durable across future administrations, it is essential that the BLM move forward with rulemaking to reform the federal oil and gas program and take meaningful policy steps to align the program with the Biden Administration's conservation and climate commitments. Ensuring that public lands management does its part to reduce emissions will require not only limits on new leasing but also limits on new drilling and production under existing leases. One way to take advantage of existing authority, consistent with obligations under the MLA and the Inflation Reduction Act, is to revise regulations to require climate screening. A climate screen

would direct, as part of administrative review, that BLM ensure all decisions to offer any new leases or to approve drilling on existing leases are consistent with climate commitments.

Many have urged action in the forthcoming oil and gas rulemaking on issues such as reclamation, meaningful public engagement and Tribal consultation, a responsible process for leasing nominations, limits on leasing to bad actors, royalty rates, and bonding. Progress on such reforms is important, but more is needed to make a difference for the climate and for communities impacted by these decisions.

At a minimum, the forthcoming rulemaking proposal should seek public comment on options for aligning oil and gas decisions with climate and justice imperatives. Given the urgency of action, the key is to begin a process soon so that you maintain options for final action in 2024.

We appreciate your consideration of our recommendations and look forward to continuing to engage on important decisions regarding how the federal oil and gas program could better serve America's public lands, waters, wildlife, and communities.

Sincerely,

Californians for Western Wilderness  
Conservation Colorado  
Earthjustice  
Earthworks  
EcoFlight  
Evergreen Action  
GreenLatinos  
League of Conservation Voters  
Los Padres ForestWatch  
National Parks Conservation Association  
Natural Resources Defense Council  
Northern Plains Resource Council  
Public Citizen  
Rocky Mountain Wild  
Rural Utah Project  
Sierra Club  
Southern Utah Wilderness Alliance  
The Wilderness Society  
Waterkeeper Alliance  
Western Colorado Alliance  
Western Environmental Law Center  
Western Organization of Resource Councils  
WildEarth Guardians

## Wilderness Workshop

CC: **Debra Haaland**, Secretary, Department of the Interior  
**Tommy Beaudreau**, Deputy Secretary, Department of the Interior  
**Laura Daniel-Davis**, Principal Deputy Assistant Secretary, Land and Mineral Management, Department of the Interior  
**Nicholas Douglas**, Assistant Director, Office of Energy, Minerals, and Realty Management, Bureau of Land Management, Department of the Interior  
**Steve Feldgus**, Deputy Assistant Secretary, Department of the Interior  
**Sally Hardin**, Director for Lands, White House Council on Environmental Quality  
**Nada Wolff Culver**, Deputy Director of Policy and Programs, Bureau of Land Management, Department of the Interior  
**Ali Zaidi**, Assistant to the President, National Climate Advisor, White House Office of Domestic Climate Policy

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[1] <https://www.bu.edu/sph/news/articles/2023/air-pollution-from-oil-and-gas-production-contributes-to-thousands-of-early-deaths-childhood-asthma-cases-nationwide/>.

