

OUTDOOR ALLIANCE

April 15, 2021

Secretary Debra Haaland
Department of the Interior
1849 C St. NW
Washington, DC 20240

Re: Department of Interior energy program review

Dear Secretary Haaland:

On behalf of the human powered outdoor recreation community, we write to express our strong support for President Biden's decision to pause new fossil fuel leasing activities on public lands and waters and initiate a programmatic review. In light of the urgency of addressing climate change, as well as the excesses of the last administration, this step is strongly warranted.

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

Climate change and the direct environmental impacts of fossil fuel development are sufficient reason alone for a rigorous reconsideration of what role is appropriate for these activities on public lands and waters moving forward. In addition to problematic environmental effects, however, oil and gas leasing has significant direct effects on outdoor recreation, effects which have been exacerbated by actions of the last administration.

Since 2018, OA has partnered with Rocky Mountain Wild to monitor new oil and gas lease sales in six western states (Colorado, Montana, Nevada, New Mexico, Utah, and Wyoming). As part of Rocky Mountain Wild's Oil and Gas Watch program, we screened our recreation database (rock climbing sites, mountain biking, hiking, and



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skiing trails, and whitewater paddling runs) against new oil and gas lease parcels to identify potential recreation conflicts and important places that might be at risk. Over the past three years, we have flagged 95 parcels and more than 150,000 acres of public land made available for oil and gas leasing and containing recreational resources.

The process of reviewing and commenting on these lease sales was significantly complicated by shortened comment periods—in some cases as short as 10 days. Additionally, BLM’s parcel review period was reduced under direction from the previous administration to no longer than 6 months from a previous average of 16 months. Simultaneously, Master Leasing Plans, which had proved useful tools for balancing oil and gas development with other resource values, were eliminated. Statewide leases were required every quarter, whereas previously sales were rotated through different field offices and regions in each state, resulting in a high level of (anonymous) nominations and proposed leases in areas with high value for recreation or conservation, as well as significant speculative leasing of low potential lands. The cumulative effect of these changes was to significantly reduce opportunities for public input, ramp up conflict between energy development and other resource values, and create long-term uncertainty for other resource values because of speculative leases.

In addition, perhaps in part stemming from compressed time frames, BLM in our experience has routinely failed to take a hard look at impacts to recreation and related socioeconomics in NEPA documents. At times this manifested as a complete failure to consider the effects of leasing on specific, developed recreation resources. In one example, BLM proposed, and then withdrew, lease parcels underlying Moab’s world famous Slickrock trail. In another example, a lease sale was proposed for a parcel containing a National Interscholastic Cycling Association (NICA) high school race course, erroneously stating in the EA that “there are no developed recreation areas near or within the project area.”

Speculative leasing has also proved to be a significant problem. In 2018, BLM offered 12.8 million acres for leasing, but only 1.4 million acres (11%) received bids, making 11.4 million acres available for noncompetitive bidding. At the end of fiscal year 2018, approximately half of all federal acreage set aside for oil and gas leasing was tethered to non-producing leases. Huge swaths of public land are being leased for next to nothing, and it is unclear what companies intend to do with the land. In



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the meantime, these leases complicate or foreclose conservation efforts or efforts by communities to invest in the outdoor recreation economy through the development of sustainable recreational uses and amenities.

In the offshore drilling context, DOI must reinstate the moratorium on new offshore drilling and support legislation to permanently protect U.S. waters from offshore oil and gas development. This step is necessary to protect valuable marine and coastal ecosystems, as well the communities and businesses that depend on these resources, including an ocean recreation and tourism industry valued annually at more than \$129 billion in the United States.

Opposition to offshore drilling is bipartisan and continues to grow across the U.S., and to date, more than 390 municipalities on the Atlantic, Pacific, and Gulf of Mexico coasts have officially voiced their opposition to offshore drilling. More than 55,000 businesses have joined regional business alliances opposing new offshore oil and gas development, and nine states, including Virginia, Florida, Delaware, New Jersey, New York, New Hampshire, Maine, California, and Oregon have passed laws that would prohibit oil and gas drilling and related infrastructure in their waters.

Moving forward, the outdoor recreation community strongly supports efforts to expeditiously wind down fossil fuel development on public lands and waters, pivot towards support for judicious development of renewable energy resources, and conserve public lands and waters, both to sequester carbon and mitigate the effects of climate change, and because of the added stresses they face from a changing climate. Moreover, we believe that sustainable outdoor recreation opportunities, the outdoor recreation economy, and the ability of outdoor recreation amenities to attract businesses and workers across a range of industries will make a meaningful contribution to helping communities navigate economic transitions.

Given the urgency of the climate crisis, DOI must move purposefully towards making public lands and waters carbon neutral as soon as possible while providing a just transition for fossil fuel dependent communities. In the near term, key minimum interim reforms to consider may include:

- Reinstating and reinvigorating meaningful planning regimes and public comment periods;



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- Ending speculative leasing practices;
- Requiring extensive public participation from Tribes and affected stakeholders during both leasing and permitting of oil and gas development;
- Limiting the quantity and scope of competitive sales and declaring high value recreational lands unavailable for leasing;
- Creating a formal nomination process to better identify any lands suitable for oil and gas development and areas that should be protected for other multiple-use values like recreation;
- Formalizing new discretionary procedures that allow leases only when they will not impair other multiple-use values like recreation or conservation;
- Ending anonymous lease nominations and noncompetitive leasing, and ending the rampant speculation that often ties up public lands;
- Strengthening bonding requirements to avoid the cost of reclamation being imposed on taxpayers and reduce the number of abandoned and orphaned wells; and
- Increasing the 100-year-old 12.5% royalty rate to bring a better return to taxpayers for leasing public land.

We regard these as sensible, modest reforms that make sense only in the context of a broader, purposeful plan aimed at bringing the role of fossil-fuel energy development on public lands and waters into alignment with the dictates of climate science and biodiversity conservation goals reflected by President Biden's direction to protect 30 percent of our country's lands and waters by 2030..

The outdoor recreation community strongly supports the administration's early actions to pause new oil and gas leasing and evaluate how this program can be aligned with climate exigencies, justice for disproportionately and unjustly affected communities, and biodiversity conservation as embodied in the 30x30 goal. We look forward to continuing to work with you in support of these efforts.

Best regards,



Louis Geltman
Policy Director
Outdoor Alliance



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cc: Adam Cramer, Executive Director, Outdoor Alliance
Chris Winter, Executive Director, Access Fund
Beth Spilman, Executive Director, American Canoe Association
Mark Singleton, Executive Director, American Whitewater
Kent McNeill, CEO, International Mountain Bicycling Association
Todd Walton, Executive Director, Winter Wildlands Alliance
Tom Vogl, Chief Executive Officer, The Mountaineers
Mitsu Iwasaki, Chief Executive Officer, American Alpine Club
Sarah Bradham, Interim Executive Director, the Mazamas
Keegan Young, Executive Director, Colorado Mountain Club
Chad Nelson, Chief Executive Officer, Surfrider Foundation

