January 11, 2023

U.S. Secretary of the Interior Deb Haaland U.S. Department of the Interior 1849 C Street NW Washington, DC 20240

CC: Deputy Secretary of the Interior Tommy Beaudreau, Bureau of Land Management Director Tracy Stone-Manning, Bureau of Ocean Energy Management Director Amanda Lefton, White House National Climate Advisor Ali Zaidi

Dear Secretary Haaland,

President Biden made a bold promise to <u>ban new oil and gas leasing</u> on public lands and waters, and within days of taking office issued his <u>Executive Order on Tackling the Climate</u> <u>Crisis at Home and Abroad</u>. This executive order instructed the Department of the Interior to conduct a "comprehensive review and reconsideration of Federal oil and gas permitting and leasing practices in light of the Secretary of the Interior's broad stewardship responsibilities over the public lands and in offshore waters, including potential climate and other impacts associated with oil and gas activities on public lands or in offshore waters."

However, since then, the Biden Administration and Interior's leadership has fallen short. Interior issued new permits to drill at a <u>rate faster than the Trump Administration</u> during Biden's first year in office. The Bureau of Land Management and Bureau of Ocean Energy Management pushed forward with new oil and gas lease sales, including a sale in the Gulf of Mexico that was vacated by a federal court for a faulty environmental review. And Interior's final report on the leasing program failed to take into account climate impacts from extraction on public lands and waters.

The climate science is clear: Several <u>analyses</u> show that climate pollution from the world's already-producing fossil fuel fields, if fully developed, will overshoot the targets in the Paris Climate Agreement and push warming past 1.5 degrees Celsius. Avoiding such warming requires <u>ending</u> new investment in fossil fuel projects and <u>phasing out</u> production to keep as much as 40% of already-developed fields in the ground.

Fossil fuel extraction on public lands accounts for <u>nearly a quarter</u> of all U.S. climate emissions. Moreover, studies show that reducing oil and gas production on federal lands and waters in the U.S. leads to a <u>global drop in emissions</u>. President Biden cannot be a climate leader, nor can we meet our international climate commitments, until we begin managing our public lands and waters in a manner consistent with climate science. As we look forward to President Biden's next two years in office, here are 9 concrete steps Interior can take to align with the President's climate promises:

Phase out oil and gas production on public lands and waters to near zero by 2035

More than 360 climate, tribal, religious and conservation groups petitioned the Biden Administration to use its executive authority to phase out oil and gas production on public lands and oceans to near zero by 2035. The <u>petition</u> provides a framework to accomplish this through rulemaking, using long-dormant provisions of the Mineral Leasing Act, Outer Continental Shelf Lands Act and the National Emergencies Act.

### **Defend and Strengthen the National Environmental Policy Act (NEPA)**

NEPA is not only critical to ensuring that the federal government thoroughly analyzes the full range of environmental and socio-economic impacts from its actions, but it is also vital to protecting the rights of communities to weigh in on projects. We must protect and fully comply with this bedrock law right now more than ever. Recent proposals to limit NEPA in the name of "permitting reform" would undercut the government's ability to address climate and other environmental impacts and would let fossil fuel companies steamroll communities. Instead of weakening NEPA, the Biden administration should ensure that its environmental reviews grapple with the climate impacts of fossil fuel proposals, and address whether they are consistent with the United States' commitments to address climate change.

## Establish guardrails on the leasing program to protect the climate, public lands, oceans and communities.

Every day our communities, environment, and climate are impacted by fossil fuel extraction and related activity. We should not be forced to wait for comprehensive reform before implementing common-sense protections. Climate, Indigenous and conservation groups sent a <u>letter</u> to President Biden in June 2021 outlining steps the Administration should take, including withdrawing sensitive areas from availability for fossil fuel leasing, and these measures are even more pressing after the passage of the Inflation Reduction Act.

### Issue a Five-Year Plan with No New Leases

Nearly 200 groups, including 48 from the Gulf of Mexico and Alaska, united in a <u>letter</u> demanding no new leases in the Interior Department's Five Year Program (2023-2028) for offshore drilling. The administration's initial proposal potentially offers 95+ million acres for offshore drilling, including 10 lease sales in the Gulf of Mexico and one in Alaska's Cook Inlet. This would exacerbate and prolong the ongoing, serious harm that large swaths of the country have been experiencing for generations, including ecological disasters like oil spills and harmful health impacts like asthma. However, the Biden administration can still choose not to offer new leases in the final Five Year Plan.

# Stop authorizing new exploration, development, and drilling permits in the Gulf of Mexico and Alaska until there is a proper analysis of climate damage

Over 300 environmental justice, climate, conservation, public health, Indigenous, faith-based, and community organizations sent a legal <u>petition</u> demanding that the Biden Administration immediately stop authorizing new exploration plans, development plans and drilling permits in the Gulf of Mexico until it properly examines the climate damage from more offshore drilling.

# Stop issuing new permits to drill on public lands until there is a proper analysis of climate damage and a climate screen

Fossil fuel extraction on public lands accounts for nearly a quarter of climate emissions. The Bureau of Land Management must apply a climate screen when deciding whether to approve new permits to drill, informed by a robust analysis of climate impacts from fossil extraction on public lands.

### Manage public lands for climate solutions

Indigenous, justice, and environmental groups <u>petitioned</u> the Administration to develop a regulatory framework to fully implement the Federal Land Policy and Management Act of 1976 (FLPMA) and manage public lands in-line with the climate crisis. The recommended framework would empower Interior to use its authority under FLPMA to manage public lands as part of our climate solutions and for the benefit of future generations.

### Halt climate destroying projects in the Arctic

Located in the eastern portion of the National Petroleum Reserve-Alaska (Reserve), the Willow development project is the largest oil extraction project proposed on federal lands, estimated to add more than 275 million metric tons of CO2 to the atmosphere over the next 30 years. In order to protect the western Arctic and make good on its climate commitments, the Biden administration must reject the Willow Project. In addition, the Administration should rescind the Peregrine project, another potentially massive project in the western Arctic. If exploration leads to development, the project could cause 645 million metric tons of carbon dioxide to be released, further threatening the administration's climate promises. The Administration should also cancel the leases issued in the Arctic National Wildlife Refuge by the Trump administration in the unlawful 2021 lease sale. The only remaining lease-holder is an Alaska state-owned enterprise that obtained leases at the minimum price as a backstop, with banks and insurance companies and even oil companies abandoning the Arctic as a dead-end investment. Furthermore, the Administration has considerable discretion to limit the two sales under the Tax Act.

#### Protect climate and communities from near-term offshore lease sales

The Inflation Reduction Act directs the administration to offer three offshore lease sales, one in Alaska's Cook Inlet and two in the Gulf of Mexico, by December 2022 and September 2023, respectively. The administration had previously – and correctly – decided not to move ahead with these sales. While directing the sales to be held, the law leaves it to the administration to determine the details of each sale. It is imperative that Interior protect climate and communities from further harm by fully complying with its responsibility to evaluate the sales' environmental effects and using its broad authority to determine the size, scope, and conditions of the sales and any resulting leases.

The U.S. can be a climate leader, but not until we begin managing our public lands and waters in a manner consistent with climate science. Interior has the authority to act, and we urge you to move swiftly on the measures outlined above to protect our communities and future generations.

### Sincerely,

- 1000 Grandmothers for Future Generations
- 198 methods
- 350 Bay Area Action
- 350 Brooklyn
- 350 Butte County
- 350 Central Mass
- 350 Chicago NFP
- 350 Colorado
- 350 Conejo / San Fernando Valley
- 350 Contra Costa Action
- 350 Hawaii
- 350 Juneau
- 350 Kishwaukee
- 350 Mass
- 350 Merced
- 350 NJ-Rockland
- 350 PDX
- 350 Pensacola
- 350 Sacramento
- 350 Seattle
- 350 Triangle
- 350 Ventura County Climate Hub
- 350 Wichita
- 5 Gyres Institute
- 7 directions of service

Accelerate Neighborhood Climate Action

Action for the Climate Emergency (ACE)

AFGE Local 704

Alabama Interfaith Power & Light

Alaska Wilderness League

Alliance 85

Animals Are Sentient Beings Inc

Animas Valley Institute

Anthropocene Alliance

Athens County's Future Action Network, acfan.org

Aytzim: Ecological Judaism

Ban SUP (Single Use Plastic)

Bay Area JEA

Be The Change - Colorado

Beaverdam Creek Watershed Watch Group

Bergen County Green Party

Bergen County Immigration Strategy Group

Berkeley Fellowship of Unitarian Universalists Social Justice Committee

Berks Gas Truth

Berkshire Environmental Action Team

Better Path Coalition

Between the Waters

Black Warrior Riverkeeper

**Bold Alliance** 

**Boston Catholic Climate Movement** 

Break the Cycle Project

Bridging The Gap In Virginia

Bronx Jews for Climate Action

**Buckeye Environmental Network** 

Businesses for a Livable Climate

Cahaba Riverkeeper

California Communities Against Toxics

California Environmental Voters

Call to Action Colorado

Canton Residents for a Sustainable, Equitable Future

Carrizo/Comecrudo Nation of Texas

CatholicNetwork US

CAVU (Climate Advocates Voces Unidas)

CDTech

Cedar Lane Environmental Justice Ministry

Center for Biological Diversity

CENTRAL CALIFORNIA ASTHMA COLLABORATIVE

Central Jersey Coalition Against Endless War

Chaco Alliance

Chesapeake Climate Action Network

**Christians For The Mountains** 

Church Women United in New York State

Citizen's Alliance for a Sustainable Englewood

Citizens Caring for the Future

Citizens Coal Council

Citizens for a Healthy Community

Citizens' Climate Lobby Santa Cruz

Clean Energy Action

CleanAirNow EJ

Climate 911

Climate Action Campaign of the Humboldt Unitarian Universalist Fellowship

Climate Hawks Vote

climate movement co.

CLimate Reality - Portland

Climate Reality Project, Boca Raton Chapter

Climate Smart Missoula

CO Businesses for a Livable Climate

CO Dem Party - Energy and Environmental Initiative

**Coalition Against Nukes** 

ColorBrightonGreen

Community for Sustainable Energy

Concerned Health Professionals of New York

Concerned Health Professionals of Pennsylvania

Conejo Climate Coalition

Creation Collaborative of the American Baptist Church: Rochester Genesee Region

Criminal Injustice Reform Network

Dayenu: A Jewish Call to Climate Action

DC Environmental Network

Deignan Institute for Earth and Spirit at Iona University

**Delaware Working Families Party** 

Democratic Socialists of America - Knoxville, TN

**Divest NJ Coalition** 

Don't Waste Arizona

Dooda (NO) Desert Rock Organization

Dooda (NO) Helium Extraction Organization

Earth Action, Inc.

Earth Day Initiative

Earth Ethics, Inc.

Earthkeeper Health Resources

Earthworks

East Bay Community Solar Project

**Eco-Eating** 

**Ecological Health Network** 

**Eight Rivers Council** 

EJ Action Hub

**Elders Climate Action** 

Elders Climate Action - Massachusetts Chapter

**Emerson Unitarian Universalist Church** 

**Empower Our Future** 

**Endangered Species Coalition** 

**Equity Transit** 

Extinction Rebellion San Francisco Bay Area

Extinction Rebellion US

Extinction Rebellion Youth United States

Fairbanks Climate Action Coalition

First Alliance Consulting LLC

First Church Unitarian, Littleton MA

First Wednesdays San Leandro

Food & Water Watch

Forgotten People

Frack Free New Mexico

Frack Off Chaco

Franciscan Action Network

FreshWater Accountability Project

Fridays for Future Orange County

Fridays for Future U.S.

Friends of Buckingham

Friends of the Earth

George Mason University Center for Climate Change Communication

Georgia Advancing Communities Together, Inc.

Global Alliance for Incinerator Alternatives (GAIA)

**Grassroots Global Justice Alliance** 

**Greater New Orleans Climate Coalition** 

Greater New Orleans Housing Alliance

Greece Baptist Church Sustainability Team

Green America

Green New Deal Virginia

Green Party of Nassau County

**Green State Solutions** 

Greenbrier River Watershed Association

GreenFaith

GreenpeaceUSA

Hands Across the Sand

Harford County Climate Action

Healthy Gulf

**Healthy Ocean Coalition** 

Heartwood

**Hispanic Access Foundation** 

Honor the Earth

I-70 Citizens Advisory Group

Indian Point Safe Energy Coalition

Indigenous Environmental Network

Indivisible Ambassadors

Indivisible Colorado

Indivisible Highland Park (New Jersey)

Indivisible South Bay LA

Indivisible Ventura

Inspiration of Sedona

Interfaith Council for Peace and Justice

Interfaith EarthKeepers

Interfaith Power & Light

International Marine Mammal Project of Earth Island Institute

Intheshadowofthewolf

Iowa CCI

Islamic Society of North America (ISNA)

Jewish Climate Action Network NYC

Kentucky Interfaith Power and Light

Kickapoo Peace Circle

Labor Network for Sustainability

Larimer Alliance for Health, Safety and Environment

Livelihoods Knowledge Exchange Network, Inc. (LiKEN)

Locust Point Community Garden

Los Padres ForestWatch

Madhvi4EcoEthics

Malach Consulting

Maternal and Child Health Access

Mattawoman Watershed Society

Mayfair Park Neighborhood Association Board

Media Alliance

Mental Health & Inclusion Ministries

Metro N.Y. Catholic Climate Movement

Micah Six Eight Mission

Michigan Environmental Justice Coalition

Mid-Ohio Valley Climate Action

Milwaukee Riverkeeper

MN350

Montana Environmental Information Center

Montbello Neighborhood Improvement Association

Mothers Out Front

MoveOn.org Hoboken

Nassau Hiking & Outdoor Club

**Native Movement** 

**Natural Capitalism Solutions** 

NC-APPPL (NC Alliance to Protect Our People and the Places We Live)

New Mexico Climate Justice

New Mexico Interfaith Power and Light

New York Progressive Action Network

Nicaragua Center for Community Action

No Fracked Gas in Mass

North American Climate, Conservation and Environment(NACCE)

North Country Earth Action

North Range Concerned Citizens

Northern Alaska Environmental Center

Nuclear Energy Information Service (NEIS)

Nuclear Information and Resource Service

NYPAN Enviro Committee

**NYPAN Greene** 

NYPAN-SFL

Occupy Bergen County

Ocean Conservation Research

Oceanic Preservation Society

Oil and Gas Action Network

Olympic Climate Action

OneUpAction International

Our Revolution Hawaii

Our Revolution Ocean County

Our Wisconsin Revolution

Pass the Federal Green New Deal Coalition

Patagonia

Peace Action WI

Pennsylvania Council of Churches

Pennsylvania Interfaith Power & Light

Physicians for Social Responsibility Pennsylvania

Plastic Pollution Coalition

Preserve Giles County

Preserve Montgomery County VA

Progressive Democrats of America/Orange County Chapter

Project Amiga

Protect Our Water, Heritage, Rights (POWHR)

PSARA (Puget Sound Advocates foe Retirement Action)

**PSR** Arizona

Public Citizen

Pueblo Action Alliance

Rachel Carson Council

RapidShift Network

Reconstructionist Rabbinical Association

Resist the Pipeline

Resource Renewal Institute

Revolving Door Project

Rio Arriba Concerned Citizens

Rise To Thrive

Rivers & Mountains GreenFaith

Rocky Mountain Wild

RootsAction.org

Salem Alliance for the Environment

San Bernardino Free Them All

San Luis Valley Ecosystem Council

Santa Barbara Standing Rock Coalition

Santa Cruz Climate Action Network

Santa Cruz for Bernie

Saphron Initiative

Save EPA (former employees)

Save Our Shores

SAVE THE FROGS!

Schools for Climate Action

Scientist Rebellion, Turtle Island

Seneca Lake Guardian

Seventh Generation

Sierra Club

Sisters of Mercy of the Americas Justice Team

Sisters of St. Dominic of Blauvelt, New York

**Small Business Alliance** 

SoCal 350 Climate Action

Social Eco Education (SEE)

Social Justice Committee of the UU Congregation at Shelter Rock

Society of Alternative Resources

South Asian Fund For Education Scholarship and Training Inc

South Seattle climate action network

South Shore Audubon Society

Southeast Alaska Conservation Council

Southwest Native Cultures

Southwest Organization for Sustainability

Sovereign Iñupiat for a Living Arctic

Spirit of the Sun, Inc.

Stand.earth

Stone Crab Alliance

Sunflower Alliance

Surfrider Foundation

Sustainable Mill Valley

Sustainable PracticesLTD

Syracuse Cultural Workers

System Change Not Climate Change

**Taproot Earth** 

Terra Advocati

Texas Campaign for the Environment

The CLEO Institute

The Climate Center

The Descendants Project

The Enviro Show

The Green House Connection Center

The Last Plastic Straw

The People's Justice Council

The Quantum Institute

Third Act Ohio

Third Act Virginia

Thomas Berry Forum at Iona University

TIAA-Divest! from climate destruction

**Tidelines Institute** 

Together Colorado Climate Justice Committee

Transformative Wealth Management, LLC

tUrn Climate Crisis Awareness & Action

**Turtle Haven Sanctuary** 

Turtle Island Restoration Network

Unitarian Universalist Justice Ministry of North Carolina

Unitarian Universalists for a Just Economic Community

Unitarian Universalists for Social Justice

Unite North Metro Denver

United For Clean Energy

Upper Gila Watershed Alliance

Upper West Side Recycling

**USC Environmental Student Assembly** 

Virginia Community Rights Network

Volusia Climate Action

Vote Climate

Wall of Women

Waterkeeper Alliance

Waterspirit

Waterway Advocates

WESPAC Foundation, Inc.

Western Environmental Law Center

Western Slope Businesses for a Livable Climate

WildEarth Guardians

Williamsburg JCC Indivisible

Wilwerding Consulting, also Co-Chair, Littleton Business Alliance

Women's Earth and Climate Action Network

Womxn from the Mountain

Working for Racial Equity

Youth Vs Apocalypse

Zero Hour