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 <u>40%</u> 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 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