

350 CONEJO/SAN FERNANDO VALLEY ♦ 350 HAWAII ♦ 350 MERCED ♦ 350 SILICON VALLEY ♦ AMIGOS BRAVOS ♦ BERKS GAS TRUTH ♦ CALIFORNIANS FOR WESTERN WILDERNESS ♦ CENTER FOR BIOLOGICAL DIVERSITY ♦ CENTER FOR CIVIC POLICY ♦ CITIZENS FOR CLEAN AIR AND WATER IN BRAZORIA COUNTY ♦ CLEAN ENERGY ACTION ♦ CLIMATE ACTION RHODE ISLAND-350 ♦ CLIMATE ADVOCATES VOCES UNIDAS ♦ CLIMATE HAWKS VOTE ♦ CONSERVATION VOTERS NEW MEXICO ♦ DINÉ C.A.R.E. ♦ EARTH ACTION, INC. ♦ EMPOWER OUR FUTURE ♦ EXTINCTION REBELLION SAN FRANCISCO BAY AREA ♦ FAIRBANKS CLIMATE ACTION COALITION ♦ FOOD & WATER WATCH ♦ FOSSIL FREE CALIFORNIA ♦ FRIENDS OF THE EARTH ♦ INDIAN PEOPLE'S ACTION ♦ INTERNATIONAL MARINE MAMMAL PROJECT OF EARTH ISLAND INSTITUTE ♦ LEAGUE OF CONSERVATION VOTERS ♦ LIVEABLE ARLINGTON ♦ LOS PADRES FORESTWATCH ♦ MONTANA ENVIRONMENTAL INFORMATION CENTER ♦ NATIONAL PARKS CONSERVATION ASSOCIATION ♦ NAVA EDUCATION PROJECT ♦ NEW MEXICO ENVIRONMENTAL LAW CENTER ♦ NEW MEXICO INTERFAITH POWER AND LIGHT ♦ NEW MEXICO SPORTSMEN ♦ NTS GROUP ♦ OCCUPY BERGEN COUNTY ♦ OCEANIC PRESERVATION SOCIETY ♦ POWER PAST FRACKED GAS ♦ PROGRESSNOW NEW MEXICO ♦ QUANTUM WHALE ♦ RAINFOREST ACTION NETWORK ♦ RIO GRANDE INDIVISIBLE, NEW MEXICO ♦ SEEDING SOVEREIGNTY ♦ SIERRA CLUB ♦ SOUTHERN UTAH WILDERNESS ALLIANCE ♦ TURTLE ISLAND RESTORATION NETWORK ♦ WATERKEEPER ALLIANCE ♦ WESTERN ENVIRONMENTAL LAW CENTER ♦ WESTERN WATERSHEDS ♦ WILDEARTH GUARDIANS ♦ WILDERNESS WORKSHOP ♦ WOMEN'S EARTH AND CLIMATE ACTION NETWORK (WECAN)

June 25, 2021

The Honorable Gina McCarthy  
National Climate Advisor  
The White House  
1600 Pennsylvania Avenue  
Washington, D.C. 20006

**Re: U.S. Department of the Interior's Comprehensive Review of the Federal Fossil Fuels Program**

Dear Ms. McCarthy:

We write to offer our strong support for the U.S. Department of the Interior's comprehensive review of the federal fossil fuels program. As we await Interior's interim report on this review, we want to underscore our view and the view of over [500 climate, conservation, environmental](#)

[justice, and indigenous groups](#) that it is imperative for Interior to not simply take action, but to take action commensurate with the scale of the challenge presented by the climate emergency.

Such action presents an immense opportunity for political leadership to lay the groundwork for a stable, thriving, and resilient future grounded in the protection of our public lands as bulwarks of ecological and community resilience. This opportunity was intrinsic to President Biden’s stated [campaign commitment to end the federal oil and gas leasing program](#).

Indeed, we urge the President to expand his vision and ambition to not only end the federal leasing programs, but to wind down existing federal oil and gas production. This is starkly illustrated in New Mexico’s Delaware Basin, a “sweet spot” for oil and gas production, where Enverus has concluded that [93% to 95% of the Basin’s federal public lands would be entirely unaffected by a permanent end to the leasing program](#) (see slides 15 and 16 at link), with production continuing unabated. Other states, such as Utah, have similarly concluded that President Biden’s leasing pause “[would likely have limited impacts on the state’s energy sector.](#)” Action that only targets new leases would have a far too limited capacity to limit warming to 1.5 degrees Celsius or to achieve President Biden’s specific commitment “[to achieve a 50-52 percent reduction from 2005 levels in economy-wide net greenhouse gas pollution in 2030](#)” and, ultimately, a “[net zero emissions economy-wide by no later than 2050.](#)”

We thus urge the Biden administration to stand tall in the face of political pressure, to deliver on the President’s commitment through full use of Interior’s constitutional and congressional authority, and to provide Interior with the resources and backing it will need to complete its comprehensive review and to take bold action that demonstrably aligns the federal fossil fuels program with our country’s climate commitments.

We emphasize that while fiscal reforms may assist in this effort, they are alone insufficient. In fact, increasing royalty and rental rates would serve to further incentivize continued leasing and development of federal fossil fuels and deepen the problematic overdependence of states such as New Mexico on federal fossil fuels revenue at the precise moment the science is making it loudly and abundantly clear that there is no room in either the global or U.S. carbon budget for any new fossil fuels development. As the International Energy Agency’s new report [Net Zero by 2050: A roadmap for the global energy system](#) found, new fossil fuel supply projects are incompatible with the goal of limiting warming to 1.5 Celsius even with reliance on unproven future emissions reduction technologies. Put simply, Interior must take action to end the leasing program and wind down existing production of federal oil and gas.

Fortunately, Interior is afforded with ample authority—and indeed the responsibility—to achieve this aim. As the Federal Land Policy and Management Act of 1976 provides for federal public lands, Interior must:

- Protect “air and atmospheric,” “water resource,” “ecological, environmental,” and “scenic,” values, “certain public lands in their natural condition,” and “food and habitat for fish and wildlife” (43 U.S.C. § 1701(a)(8));
- Account for “the long-term needs of future generations” (43 U.S.C. § 1702(c));
- Prevent “permanent impairment of the productivity of the land and quality of the environment” 43 U.S.C. § 1702(c)); and
- “[T]ake any action necessary to prevent unnecessary or undue degradation of the lands.” 43 U.S.C. § 1732(b).

Remarkably, Interior has never promulgated rules that specifically implement these authorities in the context of the federal fossil fuels program, let alone the climate emergency. This dynamic has created an asymmetry in Interior’s planning and management framework that favors fossil fuel exploitation at the expense of FLPMA’s other enumerated resources and values, including “air and atmospheric” values and myriad conservation values, such as water and wildlife that depend on public lands.

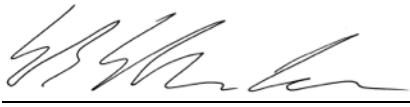
Bold action by Interior would not only ameliorate the climate crisis, but open up vast new opportunities to achieve President Biden’s goal to conserve 30 percent of the country’s lands and waters by 2030 and to thereby address the interwoven climate and biodiversity crises.

Further, such action would serve as a catalyst to bolster needed support for states and communities as the transition away from federal fossil fuels begins and accelerates. Support for action that stabilizes and diversifies revenue and jobs away from fossil fuels will help states and communities break free from dependence on boom-and-bust fossil fuel revenue and jobs and create incentives for states and communities to fully join and benefit from the shared fight to safeguard our climate, public lands, and communities. This, in turn, would help fulfill [Executive Order 14008](#)’s call to deliver on environmental justice to frontline and energy dependent communities.

As a final note, we underscore that, even setting aside the climate emergency and the need to act on environmental justice, there is a serious risk that the U.S. oil and gas industry is tilting away from already volatile boom-bust cycles and into a permanent structural decline. This decline is a product of declining capital investment, high infrastructure costs, oil and gas oversupply, shifts in energy demand, and increasing market competition from renewable energy. This decline exists even absent the internalization of industry’s many health and environmental harms, and even as industry still benefits from tremendous levels of federal and state subsidies. While oil prices have rebounded since 2020 and may remain high in the near term, oil and gas faces stiff, long-term headwinds. Put simply, the more we stay chained to oil and gas production, the less resilient revenue and jobs will prove in the face of economic realities and a warming climate.

Thank you for your consideration. We stand ready to contribute constructively to a visionary and ambitious agenda and would be more than happy to follow up with you on these matters at your convenience.

Sincerely,



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**Cc:** The Honorable Debra Haaland, U.S. Secretary of the Interior  
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Laura Daniel-Davis, Principal Deputy Assistant Secretary, Land and Mineral  
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Nada Wolff Culver, Deputy Director of Policy and Programs, U.S. Bureau of Land  
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