

April 13, 2017

The Honorable Ryan Zinke  
Secretary  
U.S. Department of the Interior  
1849 C Street NW,  
Washington, DC 20240

Dear Secretary Zinke:

We, the undersigned conservation and environmental groups, on behalf of our millions of members and supporters write with concern about the process set forth in the recent Secretarial Order to review or rescind commonsense memoranda, orders and regulations (“agency actions”) concerning oil and gas development and other management issues on our public lands.

These commonsense agency actions were taken following significant public input, comment, meetings and directed outreach processes that ensured the American people had a say in how their lands and resources were to be managed. The original policies in place took many years to develop. They were crafted out in the open, with comment periods, public forums and multi-agency reviews. It is vital that any policies that affect lands owned by all Americans give everyone the ability to weigh in and voice suggestions or concerns.

We have grave concerns that, under the processes outlined in Secretarial Order 3349 (SO 3349), significant decisions shaping development and management strategies for our public lands will be made behind closed doors with little to no public involvement. These decisions will effectively scrap decades of work by public servants furthering the public interest as required under law.

The 12 actions enumerated in SO 3349 as subject to review were the product of approximately 35 years of agency staff time invested over the past 7 years. However, SO 3349 could wipe this investment away in just three weeks of political deliberations behind closed doors.

These actions include implementing memoranda on climate mitigation, incorporating executive orders on climate change preparedness and resiliency for public land management, four different regulations concerning responsible and safe oil and gas development, integrating climate change impacts in environmental analysis under the National Environmental Policy Act and ensuring that climate change was considered in national security doctrine, of which the Department of the Interior was part of the interagency working group. For example, the Bureau of Land Management’s Waste Prevention, Production Subject to Royalty and Resource Conservation rule took more than two and a half years to complete. Those years included 8 public forums across the country and over 300,000 comments, not to mention multiple reviews by the Office of Intergovernmental Regulatory Affairs. And yet, through SO 3349, a report on this regulation is expected to be completed in three weeks. And SO 3349 does not limit the scope of the Departmental review to just these policies.

A Department of the Interior that works in darkness to change management policies will not maintain the trust of the American people. These decisions will have a significant effect on public land access and conservation outcomes, and appear designed to satisfy policy objectives to promote energy development notwithstanding legal requirements to ensure balanced multiple use. Decades of conflict and controversy have shown the public expects, and our public land laws require, more from these lands than extractive uses.

We urge you to ensure that any decisions made about public land management decisions are done out in the open with the full involvement of the American people including stakeholder engagement, public forums and extensive comment periods. These policies were crafted with significant public support and we oppose any attempts to overturn or repeal them. Should you choose to review previous regulations, orders and policies, we strongly ask that it is done with clear respect for the many legal responsibilities the Department shoulders, the broad range of constituencies it represents, and the time and public engagement that the employees of the department put into crafting them in the first place.

Sincerely,

Wm. Robert Irvin, President and CEO  
American Rivers

Robert Wendelgass, President and CEO  
Clean Water Action

Jamie Rappaport Clark, President and CEO  
Defenders of Wildlife

Trip Van Noppen, President  
Earthjustice

Fred Krupp, President  
Environmental Defense Fund

Erich Pica, President  
Friends of the Earth

Mark Magaña, President and CEO  
GreenLatinos

Annie Leonard, Executive Director  
Greenpeace USA

Gene Karpinski, President  
League of Conservation Voters

David Yarnold, President and CEO  
National Audubon Society

Theresa Pierno, President & CEO  
National Parks Conservation Association

Rhea Suh, President  
Natural Resources Defense Council

Andrew Sharpless, Chief Executive Officer  
Oceana

Jeff Carter, Executive Director  
Physicians for Social Responsibility

Michael Brune, Executive Director  
The Sierra Club

Jamie Williams, President  
The Wilderness Society

Cc     Acting Director of Bureau of Land Management Michael Nedd  
          Acting Director of Fish and Wildlife Service Jim Kurth  
          Acting Director of Bureau of Ocean Energy Management Walter Cruickshank  
          Acting Director of Office of Surface Mining, Reclamation and Enforcement Glenda H. Owens  
          Acting Director of Office of Natural Resource Revenue Gregory Gould  
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