



March 20, 2023

President Joseph R. Biden
The White House
1800 Pennsylvania Avenue
Washington, DC 20050

Dear Mr. President,

Last week we saw significant decisions from your administration on conservation of public lands, but also fossil fuel development. As I reflect on these decisions and look forward to what is to come this week at your conservation summit in Washington, D.C., I write to urge you to direct your administration to develop a comprehensive climate plan for public lands that guarantees we meet our emissions and resilience goals while supporting communities. Further, we ask that you direct your administration to stop adding to climate disruption until a plan has been established. We must ensure that consequential projects like ConocoPhillips' Willow are no longer made in a vacuum, without the benefit of the considerations and direction that a comprehensive plan would provide.

A comprehensive climate plan for public lands must include: 1) phasing out drilling on public lands and waters while supporting communities in making an economic transition, 2) responsibly ramping up renewable energy infrastructure, 3) protecting natural carbon sinks, especially old growth and mature forests, 4) conserving lands for climate and community resiliency, and 5) centering community input and climate considerations when evaluating development projects. Specifically, we recommend that your administration undertake the following actions:

1. Phase out fossil fuel development on public lands and waters while supporting communities undergoing an economic transition

We recommend that your administration launch rulemakings to update the federal oil and gas program and to align the Department of the Interior's actions with a climate- and conservation-minded approach to managing public lands. To deliver on the promise of last summer's historic climate bill, it will take significant changes to how we manage fossil fuel development on public lands. Durably implementing policy changes included in the Inflation Reduction Act means enacting critical fiscal reforms and empowering the Department of the Interior to take lands off the table from oil and gas extraction. Your administration must also establish a system for factoring climate impacts into its leasing and permitting decisions. We call on your administration to halt further leasing, exploration and permitting in the Western Arctic (the Reserve) unless consistent with a final climate plan for public lands. Your administration should also cancel oil and gas leases in the Arctic National Wildlife Refuge to protect another invaluable stretch of Alaska wilderness – those leases issued during the Trump years would add even more fossil fuels to the cycle of extraction and consumption that is driving climate change and degrading public lands. Furthermore, your administration should prioritize communities impacted by a fossil fuel phase out with funding and other resources to support a successful economic transition.

2. Responsibly ramp up renewable energy infrastructure

The Bureau of Land Management must ensure that public lands are part of that transition to a renewable energy economy – and that it does so responsibly, taking a comprehensive, landscape-level, smart-from-the-start approach to renewable energy. Your administration should update the 2012 Solar Programmatic Environmental Impact Statement and other policies that ensure responsible renewable energy development and center community and Tribal engagement. Your administration should not have to choose between its commitments to climate protection, biodiversity conservation, Tribal sovereignty and environmental justice.

3. Protect natural carbon sinks like old growth and mature forests

We recommend that the U.S. Forest Service undertake a climate-focused rulemaking that prioritizes the conservation of mature and older forests from logging, wildfire, drought and other climate stressors, emphasizes carbon storage, watershed conservation, and habitat connectivity and engages in meaningful co-management of forest lands with Indigenous partners. Natural climate solutions play an important role in mitigating overall carbon emissions, and a key natural climate solution is the conservation of older forests, given they are uniquely productive at capturing and storing carbon. Experts find ecologically intact older forests to be more resilient to climate-driven stressors, while providing clean air, water, key habitat and migration corridors for thousands of wildlife species across the nation.

4. Conserve lands for climate and community resiliency

We recommend that your administration designate and expand national monuments and wildlife refuges. Doing so would permanently protect large portions of public land that preserve wildlife habitat, significant cultural and historical sites, dwindling water sources and access points for nature-deprived communities who bear the unequal impacts of a warming climate. These designations should be used swiftly and broadly to leverage nature-based solutions to protect biodiversity and buffer us against the worst impacts of climate change. More federal designations will demonstrate your commitment to focus on “a whole-of-government approach” to promoting racial justice and respecting sovereign Tribes, addressing climate change, listening to the science and rebuilding our economy through job creation.

Further, the Bureau of Land Management must take a more aggressive approach that exercises its existing tools to prioritize nature conservation and biodiversity protection on the 245 million acres it manages in the United States. Currently, 90 percent of these lands are open to oil and gas leasing. The Bureau should direct managers to identify, evaluate and designate new protected areas critical for climate adaptation, habitat conservation and connectivity, and safeguarding cultural resources and community resilience. They should also strengthen designations like Areas of Critical Environmental Concern and others to ensure they meaningfully protect the historical and cultural values, water supplies, wildlife, grasslands and other natural systems they are designed to protect and that are critical in our ability to adapt to climate impacts. Many Bureau-managed lands are directly adjacent to rapidly growing population centers across the West, including Phoenix, Albuquerque, Denver and Las Vegas that depend on these lands for clean water, healthy ecosystems and vital outdoor recreation access.

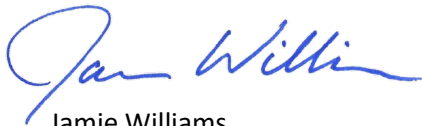
5. Center community input and climate considerations when evaluating development projects

Your administration needs to center people in all its environmental reviews by improving public transparency, more meaningfully involving Tribal governments and communities of color and doing everything in the government's power to mitigate harmful impacts to frontline communities. Your administration has an opportunity to accomplish these critical objectives during the upcoming National Environmental Policy Act (NEPA) rulemaking process. We call on your administration to fully restore, strengthen and modernize NEPA's implementing regulations, including by enshrining key provisions of the recent White House Council on Environmental Quality guidance pertaining to climate change impacts.

Together, this suite of recommendations would represent the kind of comprehensive climate plan for public lands that would truly harness their potential to help your administration meet its climate goals—and help to cement your climate legacy. Implementing these recommendations will require ambition, urgency and resolve. The climate crisis demands nothing less, and I am confident that your administration can deliver.

Thank you for your time and consideration. We look forward to continuing to work with you and your administration on these important issues.

Sincerely,



Jamie Williams
President, The Wilderness Society