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Submitted via www.regulations.gov

Eve Barnett
Policy and Intergovernmental Affairs Analyst
Office of Intergovernmental and External Affairs
Office of the Secretary, Department of the Interior

Re: Request for Information To Inform Interagency Efforts To Develop the American Conservation and Stewardship Atlas

Dear Ms. Barnett:

Western Energy Alliance appreciates the opportunity to submit comments on the interagency effort to develop the American Conservation and Stewardship Atlas (ACSA). As the administration proceeds with an [initiative](#) to “conserve, connect, and restore” 30 percent of all lands in America, it is important to identify the principles that should underpin this goal and how it can best be achieved.

Western Energy Alliance represents 200 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas across the West. The Alliance represents independents, the majority of which are small businesses with an average of fourteen employees.

The America the Beautiful initiative to protect 30% of lands by 2030 has been in progress since January 2021, yet it remains unclear exactly how this goal will be quantified. The Alliance is supportive of efforts to increase conservation of lands where it is appropriate and necessary, yet we are also concerned that this plan may be used to simply place large areas of the country off limits to productive uses such as oil and natural gas development. It is critically important that the administration defines “protected” lands in accordance with statutory authority and recognize that existing land designations may already be sufficient to achieving the goals of “30 by 30.”

According to U.S. Geological Survey (USGS) data, nearly 40% of lands in the United States qualify as a “protected area” and are managed by federal, state, or local government. The [USGS Gap Analysis Project](#) divides all acreage in America into status codes that designate the level of protections applying to these lands, from National Parks and wilderness areas in Status 1 to private lands with no legal restrictions in Status 4. The interagency working group developing the ACSA should build off the existing USGS data.

Public lands are especially predominant in the West, where the Bureau of Land Management (BLM) manages 245 million acres of surface and 700 million acres of

subsurface minerals. The U.S. Forest Service and state and local governments also manage vast areas across the West.

BLM has a statutory mandate to manage for multiple use and sustained yield of public lands, and it does so through the many resource management plans (RMP) that cover field offices across the West. These RMPs designate which lands are open or closed to various uses such as grazing, recreation, and resource development, and what restrictions and stipulations apply to those uses.

As the interagency working group develops the ACSA, it should acknowledge that BLM's RMPs already provide substantial protections for public lands and include these acres toward the calculation of the 30% goal. Similarly, where USFS and state and local governments have developed land use plans that provide for multiple use with appropriate restrictions, these acres should also count towards the final conservation goal.

Congress established the multiple use mandate because it is important to balance conservation with resource development, and because these uses coexist. In fact, oil and natural gas development provides critical funding for our National Park System through the Great American Outdoors Act (GAOA) and the Land and Water Conservation Fund (LWCF).

In 2020, GAOA established a new National Park and Public Lands Legacy Restoration Fund (LRF) that authorized up to \$1.9 billion annually to address the \$20 billion maintenance backlog in national parks and other public lands. The LRF is funded from 50% of the revenues generated from energy development on public lands. GAOA also dedicated \$900 million in annual revenues from offshore oil and natural gas development to the LWCF, which [conserves public lands](#).

These programs demonstrate how vital energy development is to funding conservation and restoration projects on our most cherished public lands. It is therefore critical that the America the Beautiful initiative not undermine the goals of GAOA by restricting or prohibiting energy development on federal lands and waters, and instead it should recognize the important role the oil and natural gas industry plays in funding these much-needed projects.

Furthermore, oil and natural gas companies have undertaken and will continue to support voluntary conservation programs that protect habitat and species across the West. These efforts, which include candidate conservation agreements with assurances (CCAA) and habitat conservation plans (HCP), are not required and typically cover private lands. CCAAs and HCPs have been proven effective and essential to the recovery of species that might otherwise become threatened or endangered. The working group should include lands covered by voluntary conservation programs in the 30% calculation, as failing to do so would greatly disincentivize their use in the future.

Finally, we urge the working group to not recommend new, overly restrictive designations such as national monuments or wilderness areas simply to achieve a broad conservation goal. Several recent monument designations have intentionally set aside millions of acres from productive use, rather than protecting the specific cultural resources within the monuments, in violation of the law. Those designations were made over the objection of state, local, and tribal leaders, and those who live and make a living near the monuments.

The America the Beautiful initiative should not be a tool for enacting broad new prohibitions on land uses; instead, it should catalog existing protections through the ACSA and guide agencies towards thoughtful, balanced land use planning in the future.

Western Energy Alliance appreciates the opportunity to submit these comments, and we look forward to working with the interagency working group as it continues to develop the 30 by 30 plan and the American Conservation and Stewardship Atlas.

Sincerely,



Tripp Parks
Vice President of Government Affairs