



CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

September 28, 2017

The Honorable Ryan Zinke  
Secretary  
U.S. Department of the Interior  
Washington, D.C. 20240

Dear Secretary Zinke,

As a coalition of the nation's largest labor unions and environmental groups, collectively representing millions of members and supporters, we write to express our strong and steadfast support for the policies contained in IM 2010-117. These important measures established reasonable and successful best practices for critical aspects of the Bureau of Land Management's (BLM) onshore oil and gas program.

These common sense policies are a precedent for responsible production and transparent and fair leasing decisions, neither of which were common practice before 2010. Many of our members—union members and conservationists alike—are active users of our public lands. They hunt, fish, hike, camp, and more. Some of them work in the oil and gas sector and other industries. And they know that common-sense practices exist today to help ensure the responsible development of our energy resources and protection of our public lands for access and recreation.

Importantly, the IM formally recognized that because “there is no presumed preference for oil and gas development over other uses” under federal law, “leasing of oil and gas resources may not be consistent with protection of other important resources and values, including units of the National Park System; national wildlife refuges; other specially designated areas; wildlife; and cultural, historic, and paleontological values.” This policy statement provides the BLM with the appropriate legal framework for evaluating oil and gas proposals, in particular because as recently as 2009 many staff members “believed they were required by law to give greater deference to mineral leasing proposals than to the protection of other land uses. . . .”<sup>1</sup>

Additionally, the IM contains several commonsense measures designed to enhance public and stakeholder participation and reduce conflicts over oil and gas decisions, including:

- Creating several entry points for the public to engage in proposed leasing and drilling decisions;
- Establishing Master Leasing Plans (MLPs) as a planning tool that BLM can use to develop a roadmap, in consultation with local stakeholders, that designates appropriate areas for energy development while ensuring that other uses are properly balanced;

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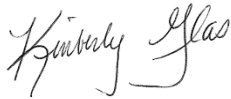
<sup>1</sup> Final BLM Review of 77 Oil and Gas Lease Parcels Offered in BLM-Utah's December 2008 Lease Sale at 17 (Oct. 2009).

- Requiring consultation with key stakeholders, such as local officials, state wildlife agencies and other federal agencies, like the National Park Service, prior to leasing;
- Standardizing compliance with the National Environmental Policy Act;
- Requiring staff visits to proposed lease parcels to assess resource conditions and determine whether new resource protection measures are needed;
- Requiring the posting of maps and GIS data for proposed leases; and
- Directing BLM to resolve any protests against proposed leases prior to holding lease sales.

The practices launched by the 2010 IM are now standard operating procedures for BLM, and the public and stakeholders have come to expect and rely upon the additional engagement opportunities, NEPA processes, and information available. Our members participate in these processes and have a seat at the table as key stakeholders. This has resulted in more informed leasing decisions that better reflect on-the-ground conditions and respond directly to information and concerns provided by local officials, private property owners, state and federal agencies, conservation groups and the broader public.

We must not backtrack to the old system involving litigation, delays and controversy mainly due to murky, non-transparent decision-making. Doing so would destroy an established system that not only is working, but benefits everyone from county commissioners to ranchers, conservationists, and workers.

Sincerely,



Kim Glas  
Executive Director  
BlueGreen Alliance