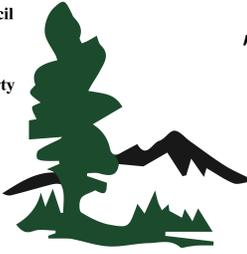


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# The Coalition To Protect America's National Parks

*Voices of Experience*

April 06, 2017

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

Subject: Secretarial Order # 3349 American Energy Independence

Dear Secretary Zinke:

I am writing to you on behalf of over 1,200 members of the Coalition to Protect America's National Parks (Coalition), who collectively represent more than 30,000 years of national park management experience. The Coalition studies, educates, and advocates for the preservation of America's National Park System. For some time we have actively engaged in air quality and water quality issues affecting parks and we are writing today to express our concerns that provisions of Secretarial Order # 3349 American Energy Independence, if fully implemented, will cause serious harm to the resources and values for which many of the parks were established.

First, though, we send our congratulations and wish you well in your appointment as Secretary. We look forward to working cooperatively with your administration on a number of important issues affecting units of the National Park Systems (parks).

As you know, just last year the nation observed the 100<sup>th</sup> anniversary of the National Park Service, a year-long celebration that resulted in record visitation in many of our national parks. Americans and our guests from around the world were reminded of the foresight of Congress when, in 1916, a Federal system of parks was created. Congress established the fundamental purpose of these parks, which is "...to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

Now, barely three months into the second century of the National Park System, the new administration has issued orders that, if implemented fully, could indelibly harm many of the same parks we so recently celebrated. On March 28, President Trump issued an Executive Order (EO) titled "Promoting Energy Independence and Economic Growth" that rolls back numerous environmental protection policies and regulations related to oil, gas, and mineral extraction on public lands. On March 29, the Department issued Secretarial Order # 3349, which mirrored many of the requirements of the EO. The rollbacks identified in these orders will inevitably harm national park resources and values and worsen air quality problems, such as pollutant levels and haze, which are already adversely impacting resources and the quality of visitor experiences.

We are especially concerned about a provision in the Secretarial Order directing Interior agencies to review regulations related to the management of "non-Federal oil and gas rights" on agency-managed lands. For the Park Service, this means a review of 36 CFR Part 9, Subpart B (the "9B" regulations). Though not widely

known, 12 parks currently have oil and gas operations and another 30 parks have the potential for future development of privately held oil, gas, and other mineral rights within their boundaries. In these parks, the Federal government owns only the surface of the land, but manages these landscapes as part of the National Park System.

We fully understand and support that energy development on public lands contributes to jobs and energy independence. We also know that energy extraction operations located in or near national parks must be well planned and managed to ensure an appropriate balance between energy development and resource conservation. The 9B regulations were first issued in 1979 to guide management of oil and gas operations in those parks where permitted; they were updated in 2016. The updates were long overdue and necessary to protect park resources from the kinds of drilling operations occurring in parks today. Key improvements included eliminating exemptions regarding access across park lands and for operations grandfathered in 1979 that have precluded NPS from managing 319 of the 534 non-federal oil and gas wells occurring in parks today. The revisions also removed the 1979 cap on performance bonds for approved operations, which had become completely inadequate to cover actual reclamation costs today. Absent an adequate bond, the Park Service, and thus the American taxpayer, can get stuck with expensive reclamation costs.

The gist of our concern with the Secretarial Order is that the mandatory review and possible amendment or repeal of the Park Service 9B regulations suggest the real possibility that environmental safeguards designed to protect park resources could be seriously weakened or even removed. The result may be significant increases in drilling for oil and gas in 42 parks, along with inevitable increases in adverse impacts to park resources.

We were encouraged by your testimony at the January 17 Senate confirmation hearing where you so eloquently described your appreciation for the importance of protecting America's public lands, including parks. Park advocates everywhere found those words reassuring. Now, as Secretary, you are confronted with the challenge of acting on these promises. The issuance of Secretarial Order 3349 is one of your first major actions and, unfortunately, raises serious concerns about your level of commitment to conserving the vast natural resources found on America's most treasured public lands. Soon, when decisions are made whether to weaken, rescind, or leave in place the Park Service's 9B regulations, we ask that you carefully consider the environmental and social risks of allowing increased oil and gas extraction on national park lands, and fully support leaving the National Park Service 9B regulations, as revised, in place. Mr. Secretary, we are counting on you to fulfill the 100-year old promise made to the American people in the National Park Service Organic Act, which is to conserve the parks and "leave them unimpaired for the enjoyment of future generations."

In closing, thank you for your consideration and best wishes for a successful tenure as Secretary.

Sincerely,



Maureen Finnerty, Chair  
Coalition to Protect America's National Parks

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