CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA

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April 15, 2021

Laura Daniel-Davis
Principal Deputy Assistant Secretary
Land & Minerals Management
Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Ms. Daniel-Davis:

The U.S. Chamber of Commerce ("the Chamber") appreciates the opportunity to submit these comments in response to the Department of the Interior's ("Interior") request for public comment on its comprehensive review of the federal oil and gas program as called for in Executive Order 14008.

Energy production on federal lands is important to our economy and energy security and it is vital to dozens of state and local economies across the country. Congress has directed Interior to pursue a multiple use policy as it manages federal lands in trust for Americans. Moreover, Congress has been specific in directing the agency to conduct lease sales at regular intervals and issue corresponding permits to facilitate energy production on federal lands as an integral function of its multiple use mandate.

As such, we are deeply disappointed with Interior's policy of indefinitely banning any new leasing or permitting on federal lands and waters for the purposes of oil and natural gas development. This policy is economically harmful, would eliminate hundreds of thousands of jobs, and ultimately increase greenhouse gas emissions. In short, this policy should be reversed.

The agency's stated rationale for inhibiting oil and natural gas development on federal lands is to combat climate change. The Chamber believes there is much common ground on which all sides of this discussion could come together to address climate change with policies that are practical, flexible, predictable, and durable, and we will work with the administration to further this goal.

However, inhibiting oil and natural gas production on federal lands and waters would invariably lead to greater greenhouse gas emissions, making this policy counterproductive. Banning or restricting energy production on federal lands and waters does nothing to change demand for these resources and this policy will necessitate sourcing replacement supplies from new areas, including overseas imports and domestic areas further away from demand. These longer transportation routes, likely including overseas shipping, would increase emissions above current levels.

In addition, the ban on new energy production on federal lands and waters could have devastating impacts in communities across America. According to a recent analysis, implementing a federal leasing ban would result in:

- A loss of more than 154,000 JOBS in 2025, with job losses totally almost 538,000 in 2040
- A loss of more than $22.7 BILLION in U.S. GDP in 2025, with potential lost economic impacts reaching $76.4 BILLION in 20240
- A loss of nearly $4. BILLION in tax revenue in 2025 increasing to more than $14.8 billion in lost revenue in 2040.

It is important to note that while the ban would disproportionately hurt certain communities where federal lands and waters production occurs, its effects would ripple throughout the economy and across the nation. The supply chain for this production does not exist in just a few places, but around the entire country.

We strongly encourage you to reconsider your ban on new energy production on federal lands and waters.

Sincerely,

Martin Durbin
President
Global Energy Institute