

June 30, 2017

The Honorable Ryan Zinke 1849 C Street, NW Washington DC, 20240

RE: Secretarial Order 3359 "American Energy Independence" and Executive Order "Promoting Energy Independence and Economic Growth."

Dear Secretary Zinke:

Outdoor Industry Association (OIA) is the national trade association for suppliers, manufacturers and retailers in the \$887 billion outdoor recreation industry. I write to you today on behalf of OIA and the more than 7.6 million Americans who are employed our industry.

Through recent Executive and Secretarial Orders, you are seeking input from entities that are "significantly affected" by federal policies governing energy development on America's shared public lands and we thank you for this opportunity to provide comment. OIA is such an entity as our businesses rely on access to recreation on public lands and waters. We trust, therefore, that you will fully consider our views and perspectives on their behalf as you conduct your review. In particular, we wanted to highlight ways that the outdoor industry benefits from the current commonsense policies that balance development with outdoor recreation and other multiple uses of our public lands. These policies also ensure the involvement of local recreation users more fully in decision-making processes and ensure that industries such as ours have a "seat at the table" on these important issues alongside energy companies and other stakeholders.

You mentioned in your statement regarding the president's Executive Order on energy independence that energy production accounts for 6.4 million jobs. In contrast, outdoor recreation accounts for 7.6 million American jobs. In many of the the same states that produce coal, like West Virginia and Colorado, recreation must also be looked at as an economic driver that annually contributes \$887 billion to the U.S. economy. Much of this is possible because our public lands offer unparalleled opportunities for outdoor recreation to millions of Americans and millions of international tourists alike

We believe in a balanced approach to land management and encourage multiple uses. These beliefs reflect the values of our industry, given the diversity of activities that our members cater to – from backcountry skiing to fly-fishing to hunting and off-highway vehicle use – and we understand that energy development is a valid and important use of our public lands. After all, we use fuel to get to these backcountry experiences. However, given the growth of outdoor

recreation in western communities, energy development must increasingly be balanced with other activities, supplementing and not supplanting economic development in rural and gateway economies.

We have seen firsthand the challenges that unplanned and uncontrolled development can create for our public lands and the toll it can take on communities that rely on those lands not just for development, but also for tourism and recreation.

We also know firsthand how conflicts can be avoided through "smart-from-the-start" planning that balances the needs of energy development with the needs of other uses and sustainable activities. This approach has been enormously successful in places such as Moab, Utah, where the BLM recently completed a collaborative, locally-supported process that is allowing energy development to move forward, while protecting the national parks and world-class recreation resources that are the foundation of the area's local economy. When policies exist that create opportunities for stakeholders to sit down together and work through conflicts ahead of time, it results in a win-win for all parties.

This example is merely one of the well-established policies that benefits our industry and ensures that we are provided the opportunity to inform the management of our public lands. We again ask that you please take the benefits of these policies into consideration during the course of your review. Balancing multiple-use is what makes our public lands so great and our economy stronger. Because energy development is but one use, it is incumbent upon you and your team to be responsive to all uses and stakeholders. We hope you will consider the outdoor industry a partner in finding new and innovative ways to balance energy development with the necessity of protecting these public lands for recreation and to diversify local economies through a stable, proven and powerful economic driver in the outdoor recreation economy.

Regarding the royalty program, we appreciate your review and agree with you that, "It's important that taxpayers get the full value of traditional and renewable energy produced on public lands and that we ensure companies conduct environmental reviews under NEPA and have reclamation plans." Therefore, we urge you to implement the final rule entitled, "Waste Prevention, Production Subject to Royalties, and Resource Conservation," 81 Fed. Reg. 83008 (January 17, 2017), without delay as it is consistent with the policy set forth in Section 1 of the March 28, 2017 E.O. because on-the-shelf technologies are available to implement this rule and it will help capture and bring to market natural gas generating jobs and additional energy resources as well as ensuring clean air for the growing recreation economy.

Thank you for the opportunity to comment on these important issues and our views on how we can balance the multiple uses of America's public lands. Please keep us informed and engaged as

you proceed with your review and let us know how we can continue to provide comment and ideas on how to ensure the growth and success of healthy communities and healthy economies.

Sincerely,



Jessica Wahl Government Affairs Manager Outdoor Industry Association