



To: House Committee on Natural Resources Republican Members
From: National Parks, Forests and Public Lands and Water, Oceans and Wildlife Subcommittees; Kiel Weaver (Kiel.Weaver@mail.house.gov), Aniela Butler (Aniela.Butler@mail.house.gov), Brandon Miller (Brandon.Miller@mail.house.gov), and Rob MacGregor (Robert.MacGregor@mail.house.gov)
Date: May 3, 2021
Subject: Republican Oversight Forum on the Biden Administration's 30 x 30 Initiative

The Committee on Natural Resources Republicans will hold an oversight forum on the Biden Administration's 30 x 30 Initiative on **Tuesday, May 4, 2021, at 12:00 p.m. (EDT)** online via Zoom.

Member offices are requested to notify Chandler Guy (Chandler.Guy@mail.house.gov) **no later than Monday, May 3, 2021, at 12:00 p.m.** if their Member intends to participate. Please contact Bailey La Sage (Bailey.LaSage@mail.house.gov) should any technical difficulties arise.

I. KEY MESSAGES

- A wide range of public lands and waters interests, including hunting and fishing groups, local governments, private landowners, small business owners, ranchers, and others who rely on multiple uses of our lands have raised significant questions and concerns about the extent of the Biden administration's 30x30 proposal and how it could impact access to public lands and economic opportunity for rural communities.
- The administration has failed to develop its policy beyond a catchy tagline. They have not defined a baseline of current conservation practices, established metrics for measuring progress, or even provided clear understanding of how they define "conservation."
- Rather than setting a haphazard goal and locking up millions of acres of lands and water, our nation should focus on science-based, pro-growth and community supported conservation efforts with a measurable track record of results, solutions and success.

This document has not been officially adopted by the Committee on Natural Resources and therefore may not necessarily reflect the views of its Members.

- True conservation is about managing our lands and waters for their environmental quality, not quantity. Locking up vast swaths of land and water under onerous designations ignores the scientific principles embodied in numerous federal, state and local fish and wildlife laws.
- True conservation supports communities by providing both a cleaner, healthy environment and a robust economy. Conservation means caring for what you have, not using more than you need and managing your precious resources for this and future generations. Common-sense, practical solutions that rely on science and leverage the knowhow of local stakeholders are the best path forward to ensuring we have a healthy environment that we will leave better than we found it.

II. WITNESSES

- **The Honorable Greg Chilcott**, Commissioner, Ravalli County, Montana
- **Professor Ray Hilborn**, School of Aquatic and Fishery Sciences, University of Washington
- **Ms. Erica Tergeson**, Director of Hunting Policy, National Rifle Association
- **Mr. Brian Yablonski**, President, the Property and Environment Research Center
- **Mr. Tripp Parks**, Vice President of Government Affairs, Western Energy Alliance

III. BACKGROUND

Background and Executive Order 14008

The genesis of the 30 x 30 initiative stems from the Half-Earth Project,¹ led by the E.O. Wilson Biodiversity Foundation. Dr. Edward O. Wilson recommended in a 2016 New York Times article that 50 percent of the Earth’s surface be conserved in a natural state to support and maintain biodiversity.² In the article, Dr. Wilson argued that “the only way to save upward of 90 percent of the rest of life is to vastly increase the area of refuges, from their current 15 percent of the land and 3 percent of the sea to half of the land and half of the sea.”³ However, recent studies have shown that the best way to protect biodiversity is by preserving smaller, more biodiverse areas where resources can be focused, rather than targeting large swaths of lands.⁴

Subsequently, in the 116th Congress, Natural Resources Committee Chairman Raul Grijalva (D-AZ) introduced H.R. 8632, the “Ocean-Based Climate Solutions Act of 2020.” Title II of the bill stated that the policy of the U.S. is: “(1) to prohibit any commercial extractive or destructive human activity in at least 30 percent of the ocean under United

¹ <https://www.half-earthproject.org/>.

² *The Global Solution to Extinction*, Edward Wilson, March, 12 2016.

<https://www.nytimes.com/2016/03/13/opinion/sunday/the-global-solution-to-extinction.html>

³ Id.

⁴ Pimm, Stuart L., et al. “How to Protect Half of Earth to Ensure It Protects Sufficient Biodiversity.” *Science Advances*, American Association for the Advancement of Science, 1 Aug. 2018, advances.sciencemag.org/content/4/8/eaat2616.

States jurisdiction by 2030. The 30 percent shall include existing areas in which commercial extractive and destructive human activities are and continue to be prohibited; and (2) to support the adoption and implementation of a global goal to protect at least 30 percent of land and 30 percent of ocean areas by 2030 under the Convention on Biological Diversity.”⁵ While a hearing was held on the bill, the Natural Resources Committee did not advance the legislation.

On January 27, 2021, President Biden issued Executive Order (E.O.) 14008, entitled “Tackling the Climate Crisis at Home and Abroad”.⁶ In the E.O., the President directed the Secretary of the Interior to consult with the Secretaries of Agriculture and Commerce, the Chair of the Council on Environmental Quality, and the heads of other relevant agencies and submit a report to the National Climate Task Force within 90 days (90 days from the date of the E.O. was April 27, 2021) outlining the steps the U.S. should take to achieve the goal of conserving at least 30 percent of our lands and waters by 2030.⁷

Interestingly, the administration set this goal while it is also planning a massive shift to land-based renewable energy generation, which can occupy exponentially more land than conventional energy sources. For example, a 200-megawatt wind farm might require spreading turbines over 19 square miles while a natural-gas power plant with that same generating capacity could fit onto a single city block.⁸

The administration provided very little information on the 30 x 30 initiative beyond the E.O. For instance, an acreage amount that would satisfy the 30 percent goal remains a mystery and it is unclear how conservation efforts on private and state lands and waters will count toward the 30 percent goal, if at all. The feasibility of managing additional lands, regardless of the responsible agency, is also called into question based on the existing \$19 billion public lands deferred maintenance backlog.⁹

After such repeated questions, on March 30, 2021, the Department of the Interior (DOI) hosted an engagement session with the purported objective to pursue dialogue with Congressional staff regarding the 30 x 30 initiative.¹⁰ Unfortunately, administration officials deflected questions, provided vague responses, and simply acknowledged inquiries as “really hard question[s].”¹¹ The continued lack of information continues to heighten the concern from sportsmen, energy producers, fishing groups, farmers and ranchers, and other hard working Americans that the administration will use the 30 x 30 initiative to rationalize

⁵ <https://www.congress.gov/bill/116th-congress/house-bill/8632?q=%7B%22search%22%3A%22hr+8632%22%7D&s=2&r=3>

⁶ Executive Order on Tackling the Climate Crisis at Home and Abroad, January 27, 2021.
<https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>

⁷ Id.

⁸ *The U.S. Will Need a Lot of Land for a Zero-Carbon Economy*, Dave Merrill, April 29, 2021.
<https://www.bloomberg.com/graphics/2021-energy-land-use-economy/>,

⁹ Deferred Maintenance of Federal Land Management Agencies: FY 2009-FY 2018 Estimates and Issues, Congressional Research Service, April 30, 2019 at 3.

¹⁰ 30 x 30 Engagement Session, Department of the Interior conducted on Mar. 30, 2021 [hereinafter Engagement Session].

¹¹ Engagement Session, Statement by Matt Lee-Ashley, Chief of Staff, Council on Environmental Quality.

significant increases in federal land holdings or restrictive land management policies that limit access to public lands. On April 14th, Natural Resources Committee Ranking Member Bruce Westerman and other Committee Republicans sent a [letter](#)¹² to DOI Secretary Deb Haaland calling for more engagements and information during this process. DOI has yet to respond to the letter.

Even though these basic questions have not been answered, in February of 2021 the administration released a Statement of Administration Policy endorsing H.R. 803, the Protecting America’s Wilderness and Public Lands Act. The administration’s endorsement stated that “consistent with the recommendation of scientists that . . . the Nation must pursue a goal of conserving at least 30 percent of U.S. lands and ocean by 2030.”¹³ It remains concerning that the administration knew enough about what was “consistent” with the 30 x 30 initiative to endorse legislation being considered by the House of Representatives that would limit multiple-use and create millions of acres of new wilderness, yet did not know enough about its own initiative to answer rudimentary inquiries at a staff-level briefing or answer questions from the letter referenced above.

In light of many unanswered questions and lingering concerns from various sectors, some were hopeful that the report directed under the E.O. would help clear up some of the ambiguity surrounding the initiative. However, last week, DOI transmitted the report to White House Climate Advisor, Gina McCarthy, but refused to make it public.¹⁴ Additionally, DOI failed to notify the U.S. Congress of the report’s submission. The lack of transparency continues to fuel concerns with Members of Congress, stakeholder groups, and landowners across the country.

Federal Lands

The federal government owns roughly 640 million acres, about 28 percent of the 2.27 billion acres of land in the United States.¹⁵ According to the the US Geological Survey, 12 percent of the of these lands are permanently protected, which roughly correlates with the most restrictive land designations such as wilderness areas and national monuments.¹⁶ 12 percent is frequently the number most cited by environmental organizations when establishing their own baselines for 30 x 30,¹⁷ and it was the percentage cited in then-Congresswoman Haaland’s 30 x 30 resolution, introduced last Congress.¹⁸ If 12 percent is

¹² https://republicans-naturalresources.house.gov/uploadedfiles/2021-04-14_westerman_et_al_to_haaland_doi_re_30_x_30_engagement_session.pdf

¹³ Executive Office of the President, Office of Management & Budget, Statement Of Administration Policy, H.R. 803 Protecting America’s Wilderness And Public Lands Act, February 23, 2021. https://www.whitehouse.gov/wp-content/uploads/2021/02/SAP_HR-803.pdf.

¹⁴ *Interior finishes 30x30 report, but it's not public yet*, April 27, 2021. https://www.eenews.net/greenwire/2021/04/27/stories/1063731075?utm_campaign=edition&utm_medium=email&utm_source=eenews%3Agreenwire,

¹⁵ <https://www.crs.gov/Reports/R42346?source=search&guid=a92c611da3524498ba3d644d211d60ce&index=5>

¹⁶ “America, Send Us Your Ideas’: Biden Pledges to Protect 30% of US Lands by 2030.” *The Guardian*, Guardian News and Media, 17 Feb. 2021, www.theguardian.com/environment/2021/feb/17/biden-public-lands-waters-30-by-30.

¹⁷ <https://www.wilderness.org/key-issues/30-x-30-movement#>

¹⁸ <https://www.congress.gov/bill/116th-congress/house-resolution/835/text>

used as the baseline by the administration for future 30 x 30 policies, it would mean that the United States could turn every acre of federal land into wilderness areas and it would still fall short of the 30 x 30 goal. If 28 percent is used as a baseline, it would mean that the United States needs to acquire 41 million more acres of land. This is particularly troublesome out West, where the federal government already owns far more than 30 percent of the land in many Western states. Currently, ten Western states already contain over 30 percent federal ownership including: Alaska (61 percent), Arizona (39 percent), California (45 percent), Colorado (36 percent), Idaho (62 percent), Nevada (80 percent), New Mexico (32 percent), Oregon (52 percent), Utah (63 percent), and Wyoming (47 percent).¹⁹ Two other states, Washington (29 percent) and Montana (29 percent) are nearly 30 percent federally owned.²⁰

It is also unclear how private lands will factor into the 30 x 30 initiative, if at all. According to information provided by the Congressional Research Service, over 35 million private acres are currently managed under some type of federal conservation program.²¹ These programs include U.S. Department of Agriculture conservation programs (such as the Conservation Reserve Program) and other programs administered by the U.S. Fish and Wildlife Service and U.S. Army Corps of Engineers. There are also 213.8 million non-federal conservation acres managed by non-profit organizations (10.9 million acres), under a private conservation easement (3.0 million acres), or managed by a state, territory, regional or county government, or city government (199.7 million acres) as a park, recreation area, or other type of conservation designation.²²

In total, when adding federal lands, private lands managed for some type of conservation purpose, and state and locally owned conservation lands, there are over 889 million acres “conserved” across the U.S. - roughly 39 percent of total lands.

Federal Waters

Federal ocean and coastal designations may occur on marine or coastal areas within federal, territorial, or state jurisdiction.²³ Marine Protected Areas (MPAs) include national marine sanctuaries, national marine monuments, national wildlife refuges, national parks, national estuarine research reserves, and state and territorial counterparts to these programs. There are currently 11.8 million acres of National Marine Sanctuaries in federal and state waters, 759.6 million acres of federal waters that are Marine National Monuments under the Antiquities Act, and 1.3 million acres are National Estuarine Research Reserves.²⁴

Additionally, there are over 10 million acres in non-federal waters in the form of sanctuaries, reserves, special management areas, state parks, coastal reserves, marine

¹⁹ Hardy Vincent, Carol. “Federal Land Ownership: Overview and Data”, CRS, February 21, 2020, R42346.

²⁰ Id.

²¹ Data provided by CRS to the House Natural Resources Committee staff.

²² Id.

²³ For a description of jurisdiction over marine waters, see CRS Report RL33404, Offshore Oil and Gas Development: Legal Framework.

²⁴ Congressional Research Service, *Overview and Data Related to Study of Conserving 30% of U.S. Lands and Waters by 2030 in Executive Order 14008*, 4.21.21.

preserves, and others.²⁵ According to the U.S. Geological Survey, 26 percent of U.S. waters (including the Great Lakes) are in some type of MPA²⁶ and 32 percent of the country's oceans are already in a natural state.²⁷

There are concerns that the 30 x 30 initiative disregards the economic and social impacts on our fishing communities. For example, in the 116th Congress more than 800 members of the seafood industry and marine scientists opposed H.R. 8632, the Ocean-Based Climate Solutions Act, which could have banned fishing activity in 30 percent of federal offshore areas.²⁸ A diverse number of fisheries industry representatives recently wrote to DOI arguing that the administration's unilateral, non-transparent actions on reducing the metrics of what constitutes "conservation progress" in U.S. marine protected areas is a "stunning change" that "increases the distrust of stakeholders in the entire 30x30 process."²⁹

Additionally, scientists have questioned efforts to increase MPAs, as they could be the wrong tool for adapting to climate change, and argue that unless overfishing is widespread, MPAs themselves do not increase target species yield.³⁰ Locking up more of our federal and state waters will only serve to increase overfishing outside of protected areas with no net gain to fish stocks. A distinguished fisheries scientist will present some of these findings at this forum.

Potential Economic, Social and Recreational Impacts

Despite repeated assurances that the 30 x 30 initiative's goal is to "pursue a conservation agenda that is indeed good for the economy," administration officials have indicated that no economic analyses were conducted in conjunction with the development of recommendations.³¹

Without these economic analyses, there is no way to guarantee the initiative 'won't replicate the devastating economic impacts of the administration's prior actions, such as the revocation of the Keystone XL pipeline.³² To ensure local communities are protected, loss

²⁵ Id

²⁶ *Marine Protected Areas 2020: Building Effective Conservation Networks*, Lauren Wenzel, Mimi D'Iorio, Charles Wahle, Gonzalo Cid, Zachary Cannizzo, Katherine Darr, 2020.

<https://nmsmarineprotectedareas.blob.core.windows.net/marineprotectedareas-prod/media/docs/2020-mpa-building-effective-conservation-networks.pdf>,

²⁷ *Could Biden use private land to reach 30x30 goals?*, Jennifer Yachnin, February 17, 2021.

<https://www.eenews.net/stories/1063725297>,

²⁸ Chris Chase, Biden's "30 by 30" order could close-off 30 percent of US ocean to fishing, SEAFOODSOURCE (Jan. 27, 2021). <https://www.seafoodsource.com/news/environment-sustainability/biden-s-planned-30-by-30-order-draws-widespread-opposition-from-commercial-fishing>.

²⁹ Letter from Nat'l Fisheries Inst. et al to The Honorable Deb Haaland, Sec'y, U.S. Dep't of the Interior (Apr. 2, 2021) (on file with Comm.).

³⁰ Hilborn presentation on Title II of the Ocean-Based Climate Solutions Act.

<https://naturalresources.house.gov/imo/media/doc/Hilborn%20Testimony%20FC%20Leg%20Hrg%2011.17.20.pdf>

³¹ Engagement Session, Statement by Matt Lee-Ashley, Chief of Staff, Council on Environmental Quality.

³² See:

A Federal Leasing and Development Ban Threatens America's Energy Security and Economic Growth, Undermines Environmental Progress, API. <https://www.api.org/news-policy-and-issues/exploration->

of access and its impacts on revenues and economic opportunity should be considered in the land and water designation decision process. The absence of economic analyses also raises concerns that local communities will lose infrastructure improvement opportunities due to restrictions placed on land and water uses under the 30 x 30 initiative.

Sportsmen and women have always been key conservationists, funding key conservation efforts through programs like the Pittman-Robertson fund. Further, state fish and wildlife agencies have led the way when it comes to managing biodiversity. These conservation efforts have allowed the U.S. to become a global leader in natural resource and biodiversity protections. However, the role of sportsmen and women and how they fit into the 30 x 30 initiative remains entirely unclear.

Additionally, there are concerns that the 30 x 30 initiative will ignore the multiple use mandates of our federal lands and waters and irreversibly impact the local communities that depend on them. Vast swaths of our public lands are unhealthy, overgrown, and in desperate need of management. Tools like active forest management and grazing are vital to ensuring we have healthier, more productive lands. Generations of families have made a living and depend on working lands to sustain their way of life. While these impacts will be felt the most at the local level, the consequences will be far reaching. The 30 x 30 initiative has the potential to impact millions of acres of land and water across the United States, and refusing to seriously evaluate the consequences of this policy will only place another hurdle in front of rural America as the nation tries to recover economically.

[andproduction/federal-leasing-and-development-ban-study](#). “Economic impacts of a permanent ban include a \$700 billion decrease in U.S. Gross Domestic Product, decreased natural gas exports, and increased reliance on foreign oil.”

Timothy Puko, Ken Thomas, & Andrew Restuccia, Biden’s Climate-Change Policy Targets Oil Industry, The Wall Street Journal, Jan. 26, 2021. <https://www.wsj.com/articles/biden-to-suspend-new-federal-oil-and-gas-leasing11611672331?page=1> “Revocation of Keystone XL Pipeline immediately led to loss of 1,000 jobs.”

Letter from Jillian Balow, Wyoming State Superintendent of Public Education, et al., to the Hon. Joseph R. Biden, President of the United States, Feb. 17, 2021. A letter detailing the importance of mining, gas, and oil industries’ revenue generation and job creation.