

**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-0506**

June 20, 2025

The Honorable Doug Burgum  
Secretary  
The Department of the Interior  
1849 C Street, NW  
Washington, DC 20240

Dear Secretary Burgum:

We write to you as the Co-Chairs of the House Sustainable Energy and Environment Coalition (SEEC) Lands, Waters, and Nature Task Force to express our deep concerns with the intent behind the Department of the Interior's (DOI) Regulatory Reform Request for Information (RFI) published on May 20, 2025.

In addition to asking for responses that align with the executive order that created the Department of Government Efficiency (DOGE), the RFI narrowly and specifically seeks comments on DOI regulations that may be inconsistent with nine specific executive orders, eight of which address energy and resource extraction and one of which identifies market barriers to said use cases. The Department of Interior is not the Department of Energy; its role is to protect and manage our natural and cultural resources, often with a multi-use mission.

Critically, the Department of the Interior manages a broad, diverse, and critically important portfolio on behalf of the American people. As the Nation's largest land management agency, the DOI manages over 500 million acres of public lands, in addition to maintaining trust responsibility to Tribal Nations, Alaska Natives and Native Hawaiians, protecting imperiled wildlife, providing scientific information on natural resources, upholding jurisdiction over territories, and managing the development and production of offshore resources and the federal mineral estate. These are just a few of the Department's many responsibilities.

In carrying out its duties, the Department is guided by multiple statutes and a well-developed suite of regulations promulgated over many decades. While we can appreciate the goal of establishing a more efficient regulatory program at DOI and agree wholeheartedly with the importance of effective stewardship of our public lands and resources, it appears the true intent of the RFI is the "deconstruction of the overbearing and burdensome administrative state." This goal is contrary to existing law, Congressional intent, and the continued exercise of the DOI's many responsibilities. We have a number of concerns with this RFI that we'd like to highlight:

**1. Rollback of Environmental Protections Creates Uncertainty for Businesses and the Public and Wastes Taxpayer Dollars**

Regulations under DOI's purview have been developed over many years, even decades, and the public and businesses who operate within DOI's sphere rely on them. Repealing or modifying existing regulations can lead to whiplash and create unpredictability for businesses and the public alike. In addition to concerns about causing economic uncertainty, efforts to undermine well-established regulations can waste taxpayer dollars. In the past, deregulatory efforts have been overturned by courts

because agencies ignored science or their mandatory statutory duties under federal law, leading to further turbulence for businesses while expending taxpayer funds at no benefit to the American people.

## **2. The So-Called “Energy Emergency” Is A False Premise**

Regulatory rollbacks for fossil fuels are unnecessary because U.S. producers are already setting records pumping out the highest level of oil ever produced by any nation and companies are posting record profits. Further, as of January 2025, over 80% of public lands are already open to leasing for oil and gas. The reality is that the Administration and its allies in Congress are trying to remove any and all barriers to oil and gas drilling on the remaining 20% of our public lands. There is no evidence to support the premise that increased drilling would reduce energy prices for consumers. In fact, the “energy emergency” is a false premise and instead a pretext for the rollback of environmental protections.

Meaningful discussion of energy generation that increases capacity or lowers costs would involve clean, renewable energy sources. Instead, the Trump Administration is halting progress—issuing stop work orders to renewable energy companies who already have leases and permits for their projects, while gutting funding for clean energy.

Real energy security means diversification involving clean, affordable alternatives, not doubling down on oil and gas produced for the global market. Further, when discussing energy as part of the scientifically recognized climate emergency, the only energy industries that would be in discussion to scale would be those without greenhouse gas emissions.

## **3. Gutting of Protective Regulations Puts Our Health at Risk**

Existing regulations protect human health and the environment from harmful practices and polluting from bad actors. Eliminating them means that companies could fail to clean up oil spills in waterways that are sources of drinking water, neglect to install equipment that prevents air pollution, and destroy the scenic landscapes where we hike, fish and play. Our children deserve to inherit a safe and habitable planet where they can breathe clean air and drink clean water.

## **4. Rollback of Environmental Protections Threatens Public Lands and Puts the Outdoor Economy at Risk**

Public lands support the outdoor recreation industry that provides 5 million jobs and generates over \$1.2 trillion dollars each year in economic output.<sup>1</sup> Visitors come to public lands to see wildlife, to camp, to fish, and to hunt. They come for wide open vistas and beautiful scenery. Indigenous communities come to visit their sacred sites, practice traditional uses guaranteed by treaties, and honor their cultural heritage. If these places are despoiled, all the other values of our public lands suffer; and the public and the recreation industry bear the brunt of that damage.

## **5. The Administration’s Request for Information is One-Sided**

The RFI calls for the “deconstruction of the overbearing and burdensome administrative state” and solicits comments on regulations that should be rescinded or modified.<sup>2</sup> The Request does not ask for suggestions on which regulations should be strengthened to protect public health or the environment. Instead, it seems aimed solely to facilitate deregulation on behalf of polluting and environmentally damaging industries.

This one-sided request does not fulfill the DOI’s requirements to consult with the public. The Administrative Procedure Act (APA) requires notice and public comment before an agency can repeal an

existing rule. The DOI must consider the need for rulemaking or rescission based on statutory authority granted by Congress and cannot simply eliminate regulations that were carefully promulgated pursuant to specific statutory requirements with robust public processes.

Indeed, this RFI threatens action directly contrary to the mission of the DOI, which has an incredibly important role in protecting our irreplaceable natural, historic, and cultural resources, maintaining trust responsibility towards Tribal Nations, safeguarding millions of Americans from catastrophic wildfire, and numerous other important duties. Congress has specifically established these roles for the DOI which must continue to carry them out in accordance with law. The Department does not have the authority to rewrite its congressionally mandated duties on the basis of this RFI or any other executive action, nor can this RFI replace the APA-mandated comment period required for rulemaking.

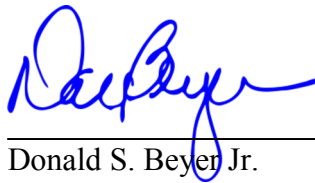
These requirements are not only procedural, but also substantive. Community voices need to be heard on any and all regulatory rollbacks contemplated by this Administration. The federal government has a responsibility to consult with Tribal Nations, and engage all stakeholders, including hunters and fishers, recreationists, frontline communities, and all other users of our public lands before moving forward with any rollbacks.

In your confirmation hearing you stated that the Department of Interior has a responsibility over a broad array of issues, from conserving the places that Americans love, to protecting and recovering our most iconic wildlife species and fulfilling our nation's trust responsibilities to Tribal Nations. We at the SEEC Lands, Waters, and Nature Task Force remind you of the Department of Interior's mandate and urge you to carry out your duties as required by law.

Sincerely,



Doris Matsui  
Member of Congress



Donald S. Beyer Jr.  
Member of Congress



Maxine Dexter  
Member of Congress

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<sup>1</sup> Outdoor Recreation Roundtable. (2025, April 4). *The \$1.2 Trillion Outdoor Recreation Economy Depends on Keeping Public Lands Public and Accessible*. <https://recreationroundtable.org/news/the-1-2-trillion-outdoor-recreation-economy-depends-on-keeping-public-lands-public-and-accessible>

<sup>2</sup> Regulatory Reform, 90 F.R. 21504 (published May 20, 2025).  
<https://www.federalregister.gov/documents/2025/05/20/2025-08931/regulatory-reform>