

April 26, 2023

Michael S. Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Outdoor Recreation Industry Support for Strong Methane Rules to Protect Air Quality on Public Lands

Dear Administrator Regan,

Outdoor recreation businesses rely on access to our public mountains, rivers, forests and deserts. Healthy public lands bring quality of life, visitors, and business investment to nearby communities through outdoor recreation, but only if we ensure the responsible management of those lands. Recently proposed rules regarding methane emissions from the Environmental Protection Agency (EPA) will significantly reduce methane in the atmosphere, a major contributor to global warming. Methane is a byproduct of oil and gas development, which can be controlled through better maintenance and improved monitoring of wells and pipelines.

The EPA proposal released in November, 2022 is an important step forward in addressing the climate crisis, protecting the health and safety of communities across the country, and prioritizing the creation of quality, family-sustaining jobs. It includes important improvements over the rule EPA initially released for public comment in 2021. These include improved leak detection and repair (LDAR) standards that will require regular monitoring at all wells with equipment known to malfunction, such as tanks and flares, using gas imaging cameras, and maintaining requirements to rapidly phase out intentionally polluting pneumatic equipment and replace them with zero-emitting alternatives.

Still, there is more work to be done to ensure that the strongest possible methane safeguards are finalized by EPA to address climate change, protect public health and promote our outdoor recreation economy. We request that the EPA's final rules include requirements that put an end to pollution from routine flaring, as the states of Colorado and New Mexico have both enacted. We also urge EPA to finalize and implement the rule quickly so our communities can realize the benefits as soon as possible.

This needed reduction in emissions is also critical for communities currently working to transition from dependence on fossil fuels to new 21st century economic drivers. Two major trends—growth in remote work and growth in demand for outdoor access—attract both increased visitors to public land communities and new business investment. Companies and professionals of all types are looking for places to locate with the high quality of life that comes from access to healthy public lands.

As outdoor industry companies, we too benefit from the economic development that results from public land in good condition. And as customers of the oil and gas industry, we have both a right and a responsibility to request that best practices be implemented in the development and production of oil and gas on public lands. By capturing methane that would otherwise be wasted through venting into the atmosphere or flaring, more gas can be sold to meet current needs, while air quality in energy producing public land communities can be improved to expand outdoor recreation opportunities.

Accordingly, the undersigned support the draft methane rules proposed by the EPA and request their strengthening and speedy finalization.

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