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**Testimony before the U.S. House of Representatives Subcommittee on Energy  
& Mineral Resources**

***HR 1964 "The National Petroleum Reserve Alaska Access Act"***

**May 22, 2013**

Thank you for the opportunity to provide testimony to the Subcommittee on Energy and Mineral Resources on HR 1964 - "The National Petroleum Reserve Alaska Access Act". My name is Deborah S. Miller.

I've lived in Alaska since 1975, working as a teacher, author, and mother of two grown daughters. Over the past four decades, I've extensively explored the Arctic on numerous trips in the Arctic National Wildlife Refuge, Gates of the Arctic National Park, and the National Petroleum Reserve-Alaska. These explorations and studies of the environment and wildlife have involved several thousand miles of travel by canoe, raft, and on foot. My experiences in the Arctic have been the foundation and inspiration for many books and articles that I've authored for adults and children.

Most recently, I explored the National Petroleum Reserve-Alaska ("Reserve") on three expeditions, traveling by canoe and on foot for more than 600 miles, along four of the Reserve's beautiful rivers: the Nigu, Etiviluk, Colville and the Utukok. I worked with a team of photographers, scientists, a sound recording artist, and other writers, including biologist Jeff Fair, and Rosemary Ahtuanguak of Barrow, and distinguished anthropologist and long-time Alaskan, Dr. Richard Nelson. We worked together to create the first photo-essay book about the Reserve, published by Braided River in July of 2012. [**\*\* submit book to the record \*\***].

I helped found the Alaska Wilderness League in 1993 to ensure that policy-makers in D.C. and elsewhere had accurate information on which to make public land management decisions. The League has an extensive environmental justice program through which it brings Alaska Natives and other Arctic residents to D.C. to ensure that their voices are heard.

Today's hearing is partially focused on the topic of my most recent book - the National Petroleum Reserve-Alaska, which is the largest single land management unit in the United States. After WWI, the Reserve was set aside by President Harding in 1923 as Naval Petroleum Reserve #4 for emergency defense purposes. The Navy was in the process of converting from coal to oil for its fuel supply. In 1976, Congress enacted the Naval Petroleum Reserves Production Act (NPRPA) and transferred management of the Reserve to the Department of the Interior. Under this act, Congress recognized the need to conserve the extraordinary natural resource values of the Reserve and explicitly authorized the Secretary of Interior to establish "special areas" that contained "significant subsistence, recreational, fish

and wildlife historical or scenic value" and to provide "maximum protection" to areas with exceptional surface values <sup>1</sup>.

At over 23 million acres, the Reserve is roughly the size of Indiana. It is a vast landscape that remains largely undeveloped. This large landscape can allow for a balanced approach between oil and gas development and the protection of the Reserve's unique values, just as Congress has called for in the NPRPA. These values include subsistence resources that are critical to meeting the needs of Alaska Natives, and other local residents.

The requirement that this balance be struck is firmly established in the letter and spirit of NPRPA and the 1980 Interior Department Appropriations Act that amended NPRPA and provided for leasing within the Reserve. NPRPA requires the Secretary of Interior to assume responsibility for protection of "significant subsistence, recreational, fish and wildlife, or historical or scenic value."<sup>2</sup> In the law, NPRPA specifically recognizes the importance of the Utukok River, Teshekpuk Lake area, and other areas found to have significant natural or historic values, by requiring any oil and gas activities in these areas to assure "maximum protection" of those values.<sup>3</sup>

In the 1980 Interior Department Appropriations Act that amended the NPRPA and opened the Reserve to leasing, Congress reiterated the importance of Special Areas<sup>4</sup> and directed the Secretary to provide for "conditions, restrictions, and prohibitions" to mitigate "reasonably foreseeable and significant adverse effects" on surface values.<sup>5</sup> Regulations governing the Reserve provide for the Bureau of Land Management ("BLM") to "limit, restrict, or prohibit use of and access to lands within the Reserve, including "Special Areas" and to take action to "protect fish and wildlife breeding, nesting, spawning, lambing of calving activity, major migrations of fish and wildlife, and other environmental, scenic, or historic values."<sup>6</sup> To summarize,

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<sup>1</sup> 42 USC § 6504

<sup>2</sup> 42 U.S.C. § 6503 ("With respect to any activities related to the protection of environmental, fish and wildlife, and historical or scenic values, the Secretary of the Interior shall assume all responsibilities ... [and] may promulgate such rules and regulations as he deems necessary and appropriate for the protection of such values within the reserve.").

<sup>3</sup> 42 U.S.C. § 6504(a) (If exploration occurs within the Utukok River, the Teshekpuk Lake areas, and other areas containing any significant subsistence, recreational, fish and wildlife, or historical or scenic value (as designated by the Secretary), it must be conducted "in a manner which will assure the maximum protection of such surface values."); *see also* H.R. Rep. 94-81(I), 94th Cong., 2nd Sess. 1976, 1975 WL 12380(acknowledging the value of the western side of the reserve as a calving ground of the Arctic caribou herd; the northeastern coastal plain area as the best waterfowl nesting area on the North Slope, and lands in and adjacent to the Brooks Range as being highly scenic).

<sup>4</sup> *See* PL 96-514, 94 Stat 2957 (1980) ("any exploration or production undertaken pursuant to this section shall be in accordance with section 104(b) of the [Petroleum Reserve Act] of 1976" which provided for protection of Special Areas).

<sup>5</sup> 42 USC § 6506a(b), Mitigation of adverse effects ("Activities undertaken pursuant to this Act shall include or provide for such conditions, restrictions, and prohibitions as the Secretary deems necessary or appropriate to mitigate reasonably foreseeable and significantly adverse effects on the surface resources of the National Petroleum Reserve in Alaska.")

<sup>6</sup> 43 C.F.R. § 2361.1(e)(1).

Congress has long-recognized and directed that the Reserve's remarkable environmental and social values be identified and protected.

HR 1964 would directly contradict this long history of the congressionally recognized need to provide for balanced management of the Reserve to ensure protection of significant surface resources.

### **Exceptional Biological Resources in the Reserve**

The Reserve contains a remarkable diversity of pristine and globally significant wild lands and biological resources that remain largely intact. The Reserve provides essential and critical habitat for a broad array of species and includes areas that support subsistence activities for more than 40 Alaska Native communities spread across northern and western Alaska.

The Reserve's wetland complex of ponds, lakes, rivers, streams, and lagoons provide nesting, feeding, molting and staging habitat for migratory bird populations of national and international significance. Marine mammals, including the polar bear, walrus, beluga whale, and several species of ice seal, use the Reserve's shorelines, lagoons, and barrier islands. The Reserve provides the calving grounds, insect relief areas, and migration corridors for the Teshekpuk Lake Caribou Herd and the Western Arctic Caribou Herd, which are vital subsistence resources for North Slope and Western arctic communities. Important populations of predators including grizzly bear, wolf, wolverine, and arctic fox are found throughout the Reserve. Other values include: designated Important Bird Areas of international significance, ancient archeological and paleontological sites; and extraordinary wilderness and wild river values that are found throughout this remarkable landscape.

During my three expeditions to the Reserve I observed nesting birds that had migrated from six different continents, such as the Northern Wheatear from Africa, or the American Golden Plover from Patagonia. I witnessed the migration of the Western Arctic Herd, where hundreds of cows with week-old calves swam across the river in front of our tent. It was amazing and humbling to discover ancient archeological sites, some dating back more than 10,000 years, and I was stunned to discover and hold an ankle bone of a duck-billed dinosaur that lived on the North Slope 75 million years ago! The Reserve has a rich history, and an incredible diversity of wildlife and habitats. The wilderness frontier that we traveled through was like no other in terms of its vastness and wildness.

### **National Petroleum Reserve-Alaska Integrated Activity Plan**

In July of 2010 the BLM published a Notice of Intent to prepare an Integrated Activity Plan and associated Environmental Impact Statement for the National

Petroleum Reserve-Alaska<sup>7</sup>. The notice kicked off more than two and a half years of scoping meetings, public hearings, and draft plans, concluding with the National Petroleum Reserve Integrated Activity Plan Record of Decision (“2013 ROD”) on February 21<sup>st</sup>, 2013. This was the final action of an extensive process that resulted in the first ever area-wide plan for the Reserve.

I was one of many Alaskans who testified at the scoping meeting in Fairbanks, and submitted written testimony in support of Management Alternative B of the draft integrated activity plan.

The National Petroleum Reserve-Alaska Final Integrated Activity Plan (“IAP”) represents a well thought out and balanced approach toward management of the Reserve. The IAP opened up roughly half of the Reserve’s acreage (encompassing 72% of Interior’s estimate of the recoverable oil in the Reserve) to oil and gas leasing while protecting the other half as five Special Areas critical to wildlife and subsistence use. Further, the IAP also expressly does not foreclose the placement of a pipeline across the Reserve. Through this balanced approach the Department of Interior has found a reasonable balance for industry, conservation groups, Alaska Natives, sportsmen, recreationists, scientists, and other groups.

During the drafting process, the BLM received over 400,000 comments, a vast majority in support of the protection of key Special Areas in the Reserve. These individuals included Alaskans, sportsmen, scientists, Alaskan Tribes and many others from around the country that care about the values within this world-class American treasure. The Department of the Interior (DOI) responded to this overwhelming support, by putting forward a final IAP that allows for access to oil and gas resources on 11.8 million acres, while safeguarding other areas—the most critical wildlife habitat—as unavailable for oil and gas leasing.

The IAP is in keeping with the long history of Congressional support for a balanced approach to management of the Reserve.

## **Special Areas**

Going back to 1976, and as reflected in the IAP, the BLM has appropriately implemented the congressional mandate to provide “maximum protection” for significant surface values and thus honor the area for more than just its potential oil and gas resources. The Reserve currently contains five designated Special Areas recognized by the BLM. These include: Teshekpuk Lake, the Utukok River Uplands, Kasegaluk Lagoon, the Colville River and Peard Bay.

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<sup>7</sup> Notice of intent to prepare an Integrated Activity Plan Environmental Impact Statement for the National Petroleum Reserve Alaska was released on July 28 2010. See: <https://www.blm.gov/epl-front-office/projects/nepa/5251/14500/15450/default.jsp?projectName=DOI-BLM-AK-0000-2010-0001-EIS>

### **Teshekpuk Lake Special Area**

Teshekpuk Lake is the largest freshwater lake on the North Slope and the third largest lake in Alaska. The lake and its associated Special Area support a unique and globally significant assemblage of biological and subsistence resources. The Teshekpuk Lake Special Area includes the most important goose molting habitat in the Arctic and provides vital habitat for tens of thousands of geese that gather annually in the area, including Brant, Greater white-fronted geese, Snow geese, and Canada geese. In the fall, the waterfowl that rely on the wetlands in this area migrate back south utilizing all four North American flyways and several international flyways.

The area around Teshekpuk Lake also includes the concentrated calving and insect relief areas for the Teshekpuk Lake Caribou Herd, which provides a critical subsistence harvest resource for North Slope communities, especially Barrow and Nuiqsut, a community that I have visited on two occasions. I wrote an in-depth article for the *Amicus Journal* about the effects of oil development on the lives of people in Nuiqsut. I was touched and troubled by some of the health and subsistence struggles that villagers face because of increased development around their community<sup>8</sup>.

The Western Arctic Caribou Herd Working Group, an organization comprised of subsistence users from small communities across northern and western Alaska, has identified and recommended that the lands surrounding Teshekpuk Lake should not be leased or developed for oil and gas<sup>9</sup>.

### **Utukok River Uplands Special Area**

The Utukok River Uplands Special Area was originally established in 1977 and currently spans approximately 7.1 million acres containing much of the Western Arctic Herd's calving and insect-relief habitat. The herd numbered approximately 75,000 when the Special Area was established, and now at approximately 340,000, is Alaska's largest caribou herd and one of the three largest in North America. The IAP expanded the Utukok River Uplands Special Area by approximately 3.1 million acres to more fully encompass prime calving and insect-relief habitat for the herd within the Reserve<sup>10</sup>. The expansion of the Utukok River Uplands Special Area within the IAP is consistent with the recommendations from the Western Arctic Caribou Herd Working Group<sup>11</sup>.

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<sup>8</sup> Ground zero. (oil industry effects on eskimos) June 22, 2001. *Amicus Journal*. Miller, Deborah S. See: <http://www.accessmylibrary.com/article-1G1-76586494/ground-zero-oil-industry.html>

<sup>9</sup> Letter of R. Ashenfelter, Chair of the Western Arctic Caribou Herd Working Group to the Bureau of Land Management Planning Team re: the Integrated Activity Plan-Draft Environmental Impact Statement for the National Petroleum Reserve-Alaska, dated June 1, 2012.

<sup>10</sup> NPRA/IAP FEIS vol 1 p. 22.

<sup>11</sup> Letter of R. Ashenfelter, Chair of the Western Arctic Caribou Herd Working Group to the Bureau of Land Management Planning Team re: the Integrated Activity Plan-Draft Environmental Impact Statement for the National Petroleum Reserve-Alaska, dated June 1, 2012.

In addition to the important caribou habitat, this special area has the highest concentration of grizzly bears in the Arctic, and healthy populations of wolverines and wolves, as well as many species of migratory songbirds, shorebirds, raptors and waterfowl, including the bar-tailed godwit, a shorebird that makes the longest known non-stop migration across the Pacific Ocean from Alaska to New Zealand!

The Utukok River Uplands Special Area includes the northern edge of the Brooks Range Mountains and foothills, as well as the expansive tundra grasslands that roll north toward the sea. This region holds outstanding wilderness values and many ancient archeological sites, some dating back more than 10,000 years ago. The Inupiaq word Utukok means "something old." Indeed, this is the area where the first North Americans lived who crossed the Bering Land Bridge from Asia. During my 2011 trip down the Utukok River, we discovered chert flakes from an archaeological site where human hands had crafted tools and weapons long ago. We felt incredibly humbled by this experience and I have tremendous respect for the Inupiaq people who continue to live in this region following their subsistence traditions.

### **Colville River Special Area**

As originally established, the Colville River Special Area encompassed 2.3 million acres and provided some of the most significant Arctic habitats for raptors.<sup>12</sup> The majority of the lower river area supports the highest densities of raptors, passerines and moose on Alaska's Arctic Slope. The Northeast NPR-A Record of Decision expanded the Colville River Special Area by 2.44 million acres to incorporate two miles on either side of two major tributaries of the Colville River - the Kikiakrorak and Kogosukruk rivers. The IAP expanded the purposes for which the Colville River Special Area was established to protect all raptors, rather than the original intent of protection for arctic peregrine falcons<sup>13</sup>.

Along the Colville River and the Etivluk River we spotted nesting raptors on the bluffs that flank these rivers every day. It was a thrill to see rough-legged hawks, gyrfalcons and arctic peregrine falcons on a regular basis.

### **Kasegaluk Lagoon Special Area**

Kasegaluk Lagoon Special Area, as established in 2004 during the George W. Bush administration, encompasses approximately 97,000 acres and includes the lagoon, its barrier islands and an area 1 mile inland from the shore of the lagoon. It was designated for its high values for marine mammals, wilderness character, and notable primitive recreation opportunities, and is a rich ecosystem on the Arctic Slope with marine tidal flats, a unique feature in the Arctic<sup>14</sup>.

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<sup>12</sup> Kessel and Cade 1956 and 1958, Cade 1960, White and Cade 1971.

<sup>13</sup> NPRA/IAP FEIS vol. 1 p. 22

<sup>14</sup> NPRA/IAP FEIS vol 1. p. 365

## **Peard Bay Special Area**

The IAP established the Peard Bay Special Area. The Peard Bay Special Area encompass 1.6 million acres to protect haul-out areas and nearshore waters for marine mammals and habitat for waterbird and shorebird breeding, molting, staging, and migration<sup>15</sup>.

These Special Area designations incorporate the principles of conservation biology, focusing on ecosystem and watershed integrity and protection, buffer zones around critical wildlife habitats, and protected corridors for movement of animals between diverse uplands and coastal areas or between seasonal areas of use. The designations are also based on the best available information regarding habitat and adaptation needs of wildlife and ecosystems that face dramatic shifts as the result of climate change. The designations also reflect the benefits for retaining wilderness values by leaving large ecosystems intact for wildlife and subsistence users.<sup>16</sup> The current Special Area designations within the IAP are consistent with the intent of congress as provided for under the NPRPA.

For the reasons noted above, Congress specifically recognized the Teshekpuk Lake and Utukok Uplands areas as warranting “maximum protection” when it enacted the National Petroleum Reserve Production Act in 1976.<sup>17</sup> Under NPRPA, Congress clearly established that while energy development was an important reason for initial establishment of the reserve in 1923, it is now a purpose that must be balanced with “conditions, restrictions, and prohibitions” to ensure protection of the Reserve’s extraordinary ecological values and subsistence resources. Past presidential administrations, both Republican and Democrat, have embraced the need for protection of these Special Areas.<sup>18</sup> The IAP continues this bi-partisan support for balanced management through an expanded Teshekpuk Lake and Utukok Uplands Special Area and the creation of the Peard Bay Special Area. The following is a summary of the Special Area designations within the Reserve:

- In the 1976 NPRPA, congress recognized that Teshekpuk Lake and Utukok Uplands areas as warranting “maximum protection”.

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<sup>15</sup> NPRA/IAP FEIS vol. 1 p. 22

<sup>16</sup> Gale A. Norton, Secretary of the Interior, January 22, 2004, Northwest NPR-A IAP/Final EIS, Vol. 1, page II-8; and, Record of Decision, p. 20. The wilderness values of the NPR-A were well detailed in the National Petroleum Reserve in Alaska Task Force, 1978, *National Petroleum Reserve in Alaska, Values and Resources Analysis, Wilderness Resources*, U.S. Department of the Interior, National Petroleum Reserve in Alaska, 105(c) Land Use Study, Study Report 2, section 4.

<sup>18</sup> Past presidential administrations as philosophically disparate as those of former President Jimmy Carter and former President George W. Bush have embraced the need for protection of these areas. The Carter administration established the Teshekpuk Lake, Utukok Uplands and Colville River Special Areas in 1977. The George W. Bush administration created Kasegaluk Lagoon Special Area within the 2004 Record of Decision for the Northwest NPR-A plan.

- In 1977, Secretary of Interior Cecil Andrus designated three Special Areas within the Reserve – the Teshekpuk Lake, the Colville River and the Utukok River Uplands Special Areas.
- Consistent with the 1998 Northeast Planning unit Record of the Decision, the Teshekpuk Lake and Colville River Special Areas were expanded.
- Consistent with the 2004 Record of Decision for the Northwest NPR-A planning unit, the George W. Bush administration created the approximately 97,000 acre Kasegaluk Lagoon Special Area.
- The IAP expanded the Teshekpuk Lake and Utukok River Uplands Special Areas and established the Peard Bay Special Area.

## **Oil and Gas Leasing & Exploration in the Reserve**

Consistent with the Congressional requirement within NPRPA to “conduct an expeditious program of competitive leasing of oil and gas in the Reserve”<sup>19</sup> the BLM has conducted numerous oil and gas lease sales within the Reserve. The IAP opens potential oil and gas leasing for approximately 11.8 million acres within the Reserve, including 72% of the total recoverable oil reserves.

Following President Obama’s directive in May of 2011<sup>20</sup> that annual oil and gas lease sales be conducted in the Reserve, BLM offered three million acres in December of 2011. That sale generated 17 winning bids covering more than 120,000 acres. Another lease sale on November 7, 2012, offered 4.5 million acres and received 14 winning bids on 160,088 total acres. There are now 191 authorized oil and gas leases in the Reserve, encompassing roughly 1.5 million acres<sup>21</sup>. The following is a historic summary of the leasing program that has taken place in the Reserve:

- There have been twelve lease offerings in the Reserve since 1982.
- Over half of those lease sales were in the past decade and the vast majority of the 13.4 million acres within the Northeast and Northwest Planning areas have been offered for lease multiple times.
- There have been six lease sales in the Northeast Planning Area alone (1999, 2004, 2008, 2010, 2011 and 2012).
- The most recent Reserve lease sale offering was conducted by the Obama Administration on November 7<sup>th</sup> of 2012 and was the fifth lease sale in six years.

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<sup>19</sup> 42 USC § 6506a

<sup>20</sup> During his May 14<sup>th</sup>, 2011 Weekly Address, President Obama announced new plans to increase domestic oil production. He directed the Department of Interior to conduct annual lease sales in the National Petroleum Reserve-Alaska. See: <http://www.whitehouse.gov/the-press-office/2011/05/13/weekly-address-president-obama-announces-new-plans-increase-responsible->

<sup>21</sup> As of April 4 2013, there are 191 active lease tracts in the NPR-A. See: [http://www.blm.gov/pgdata/etc/medialib/blm/ak/aktest/energy/npra\\_maps.Par.76062.File.dat/2012 NPR-A Oil & Gas Leases Rpt 02-20-2013.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/ak/aktest/energy/npra_maps.Par.76062.File.dat/2012 NPR-A Oil & Gas Leases Rpt 02-20-2013.pdf)



Consequently there has been ample opportunity for oil and gas exploration in the Reserve.

### **Industry Interest in the Reserve**

As a result of the twelve lease sales that have taken place since 1982 and the five that have taken place in the last six years, over 7 million acres have been leased across large portions of the Reserve. In conjunction with these sales, extensive surveys have been conducted, and dozens of exploration wells have been drilled.

However, in the past several years, the trend has been for industry to relinquish leases as opposed to the purchase additional tracts within the Reserve. The November 7<sup>th</sup>, 2012 lease sale generated very little interest from industry. Of the 398 tracts comprising roughly 4.5 million acres, only a total of fourteen were purchased by two companies totaling a little over 160,000 acres.<sup>22</sup>

### **Standards for Future Development Within the Reserve**

The IAP opens up 11.8 million acres of the Reserve as available for oil and gas leasing. As the BLM continues to move forward with lease sales in the Reserve, we believe that it is critical for the agency to ensure that future infrastructure is located and constructed in the least invasive manner possible to ensure the Reserve's recognized values are protected.

In particular, BLM should act to ensure that decisions about the location and construction of roads and other oil and gas related infrastructure are made pursuant to strong standards. Permanent roads in particular, are a concern, as they can result in a multitude of negative impacts, including destruction of habitat, disturbance of fish and wildlife, displacement of subsistence resources, and increased competition for those resources. Roadless development is now an accepted and viable option, used in many parts of the world including the sensitive tundra wetlands of the Arctic.

During the planning process there was discussion and speculation regarding the potential construction of a western Arctic pipeline to extend across the Reserve to help facilitate oil and gas production in the Outer Continental Shelf. At the same time, the IAP EIS did not analyze impacts of pipeline scenarios. Any future proposal to locate and construct such a pipeline across the Reserve must, therefore, go through a separate permitting process, including an analysis under the National Environmental Policy Act.

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<sup>22</sup> November 7<sup>th</sup> 2012 NPR-A lease sale bid recap. See: [http://www.blm.gov/pgdata/etc/medialib/blm/ak/aktest/energy/2012\\_NPR-A\\_Lease\\_Sale\\_Docs.Par.53369.File.pdf/2012\\_NPR-A\\_Lease\\_Sale\\_Bid\\_Recap.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/ak/aktest/energy/2012_NPR-A_Lease_Sale_Docs.Par.53369.File.pdf/2012_NPR-A_Lease_Sale_Bid_Recap.pdf)

## **HR 1964 “The National Petroleum Reserve Alaska Access Act”**

There are several elements to the draft legislative proposal under review by the Subcommittee on Energy and Mineral Resources (HR 1964) “The National Petroleum Reserve Alaska Access Act”). These include provisions that would:

- Effectuate a fundamental change to existing policy in the NPRPA that would undermine the requirement for balance that Congress has appropriately established in law for management of the Reserve, the nation’s single largest land management unit;
- require the Secretary of Interior put forward a new IAP, thus nullifying the IAP that was the result of multi-year planning process where BLM evaluated the values and uses of the reserve thus forcing DOI to duplicate their efforts and waste considerable resources;
- establish arbitrary fixed timelines for permit decisions and other authorizations regardless of their complexity;
- require the Department of the Interior to undertake a redundant study of oil and gas resources within the NPRA after having just recently completed such an analysis.

For all of the reasons discussed above, the provisions of this legislation are neither necessary nor beneficial. I urge the House Subcommittee on Energy and Mineral Resources to defer further action on the proposal.

### **Conclusion**

The Reserve, our nation’s largest unit of public lands, is an extraordinary landscape that contains an exceptional array of internationally significant surface values. The recently completed IAP appropriately balances oil and gas leasing consistent with the long-standing Congressional recognition that the Reserve contains more than just oil and gas. Congress has properly required that oil and gas development in the Reserve should proceed in a manner that balances energy development with other public interests, specifically the protection and conservation of the Reserve’s Special Areas and exceptional biological resources. The IAP reflects this intent.

As future development is considered there are important issues of national and local interest regarding where and how any such development is undertaken. Given the immense size of the Reserve, balance can be achieved between development and protection of the Reserve’s Special Areas, which contain extraordinary surface values.

The DOI is to be commended for adopting a very fair and balanced approach to resource development and protection of the Special Areas in the Reserve through the approved IAP in concert with the law.