



December 6, 2023

Tracy Stone-Manning
U.S. Department of the Interior, Director (630)
Bureau of Land Management
1849 C Street, NW,
Room 5646
Washington, DC 20240

Re: Proposed Rule, Bureau of Land Management; Management and Protection of the National Petroleum Reserve in Alaska (88 Fed. Reg. 62,025-62,043, Sept. 8, 2023); RIN1004-AE95

Dear Director Stone-Manning:

The Alaska Chamber writes to oppose the new proposed rule for the National Petroleum Reserve-Alaska (NPR-A).

The Alaska Chamber was founded in 1953 and is Alaska's most diverse statewide business advocacy organization. Our mission is to promote a healthy business environment in Alaska. The Chamber has more than 700 members and represents businesses of all sizes and industries from across the state, directly representing 58,000 Alaskan workers and \$4.6 billion in wages. The Chamber has a longstanding Federal Priority to support oil and gas exploration and development in Alaska's federal areas, including in the NPR-A.

The NPR-A was set aside and designated specifically for petroleum development, balanced with conservation, to ensure America's national security through access to energy. At a time of extreme global unrest and volatility, investing in domestic oil production is a matter of national and energy security.

Restricting access to energy development limits consumers' access to affordable and reliable energy. Oil production on the North Slope and in the NPR-A contributes to the Trans-Alaska Pipeline System (TAPS), a vital piece of U.S. infrastructure. Oil produced in the NPR-A will keep TAPS economically viable and capable of providing oil to the rest of the United States and beyond.

Responsible development in the NPR-A creates enormous economic benefits. Diminished oil production from the NPR-A would result in diminished production tax and other tax revenue for the State and local governments in Alaska. This means less revenue for the State of Alaska to provide services to Alaskans.

If approved, the proposed rule would have significant negative impacts on the permit approval process—even for leases that existed prior to the rule's implementation. Given the harm to existing lease contracts as well as a clear conflict with the NPR-A's purpose to develop petroleum, this rule will likely be subject to costly and lengthy litigation.

The Integrated Activity Plan (IAP) for the NPR-A that was readopted in 2022 reflects a balanced approach to development and conservation. There was a robust public process that occurred over years and involved two environmental impact statements. This proposed new rule, which has not had public



2550 Denali Street, Suite 530
Anchorage, AK 99503



Office (907) 278-2722



www.alaskachamber.com
info@alaskachamber.com

input or full analysis, does not reflect a similar balance. Under the rule as proposed, BLM would use new and different processes to consider development proposals, and few if any proposals for future oil and gas development would be approved.

The Chamber urges the administration to not approve this proposed new rule and to recognize the importance of stability and consistency in regulations, the critical role of domestic energy production in achieving energy independence, and the significance of fostering a business-friendly environment in Alaska and the U.S.

Thank you for considering the Alaska Chamber's comments on this very important issue.

Sincerely,

A handwritten signature in black ink that reads "Kati Capozzi". The signature is written in a cursive, flowing style.

Kati Capozzi
President and CEO