



August 4, 2025

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

Re: Proposed Rescission of the Management and Protection of the National Petroleum Reserve in Alaska Regulations (90 Fed. Reg. 23,507- 23,509, June 3, 2025); RIN 1004-AF02

Dear Director Pendergast:

The Alaska Chamber writes to support the June 3, 2025, proposal to rescind the 2024 final rule concerning management of the National Petroleum Reserve in Alaska (NPR-A).

The Alaska Chamber 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.

Rescinding this rule is not only consistent with the intent of the Naval Petroleum Reserves Production Act but also critical for preserving America's energy security, economic stability, and regulatory certainty in Alaska.

The NPR-A was designated for petroleum development with a mandate to balance energy production and conservation. The 2024 rule, however, effectively undermined that intent by imposing sweeping restrictions that amount to a near-ban on future leasing and development. The rule's presumption against approving oil and gas activities drives investment out of Alaska and places vital energy infrastructure—particularly the Trans-Alaska Pipeline System (TAPS)—at risk. Responsible development in the NPR-A supports TAPS throughput and contributes to the affordable and reliable energy supply our nation needs, especially amid ongoing global unrest and energy volatility.

This rule was finalized without meaningful engagement with key stakeholders. Tribal, local, and state entities—including the North Slope Borough and the Inupiat Community of the Arctic Slope—voiced strong opposition during the proposal stage. Multiple Alaska-based organizations, including the Alaska Oil and Gas Association (AOGA) and the Voice of the Arctic Inupiat, subsequently filed legal challenges. In total, five separate lawsuits have been filed, and these cases remain stayed pending completion of the administrative rescission process. The wide-ranging opposition and legal uncertainty surrounding the 2024 rule only reinforces the need to revert to a more balanced and durable approach.



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The 2020 Integrated Activity Plan (IAP) strikes an appropriate balance between conservation and development, given the extensive public participation and environmental review that occurred during its initial adoption. Returning to this framework ensures consistency, upholds the law, and supports a reasonable permitting process that encourages responsible energy development while maintaining environmental safeguards.

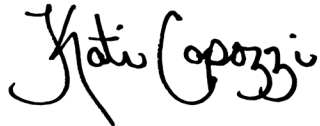
Furthermore, rescinding the 2024 rule aligns with Executive Orders aimed at unlocking Alaska's energy potential and strengthening American energy independence. Stability and predictability in federal regulations are essential for long-term investment in Alaska, and BLM's prompt action will help restore confidence among industry stakeholders and communities alike.

We urge BLM to finalize the rescission swiftly, while ensuring the administrative record is robust and responsive to public comment. Given the likelihood of renewed legal challenges, careful documentation will be vital to defend this action and uphold the agency's statutory obligations.

The Chamber urges the administration to finalize the rescission swiftly 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, reading "Kati Capozzi". The signature is fluid and cursive, with the first name "Kati" and last name "Capozzi" clearly distinguishable.

Kati Capozzi  
President and CEO