

October 29th, 2025

Re: Oppose Attacks on Sensible Regulations for the Biggest Unit of Public Land in the Country

Dear Speaker Johnson, Leader Thune, Leader Jeffries, and Leader Schumer:

CC: Members of Congress

On behalf of over 100 groups and organizations, we write to urge your opposition to S.J.Res. 80 and H.J.Res. 124, which would utilize the Congressional Review Act (CRA) to strike down the Bureau of Land Management's 2022 Integrated Activity Plan (IAP) Record of Decision for the National Petroleum Reserve-Alaska (Reserve). This misguided use of the CRA would overturn a land use plan that balances input from over 228,800 comments by outdoor recreation, energy development, subsistence, and conservation interests on management of the Reserve. It would leave significant regulatory uncertainty in its wake and would undermine the responsible management of our public lands.

As the largest contiguous unit of public land in the United States, spanning nearly 23 million acres, the Reserve possesses extraordinary ecological and subsistence values. The Reserve is a diverse ecosystem where many mammals, such as wolves, grizzly bears, moose, and wolverine, call this iconic landscape home. Likewise, marine mammals such as polar bears, Pacific walrus, beluga whales, and spotted seals utilize its rich coastal and lagoon waters. The Western Arctic and Teshekpuk Caribou Herds each rely upon distinct key habitats in the Reserve. These caribou herds are a vital subsistence resource for over 40 Indigenous communities in northern and western Alaska. Additionally, millions of migratory seabirds, shorebirds, waterfowl, and raptors rely on the Reserve for habitat throughout the year. Teshekpuk Lake, the largest Arctic lake in America, is so critical for these migratory birds that the lake and its surrounding wetlands are designated as globally significant Important Bird Areas.

Unlike the current management plan, which takes a comprehensive approach to managing the unique ecological values found in the Reserve, this resolution is targeted at vastly expanding oil and gas development at the cost of regulatory clarity, subsistence protections, and responsible management. The risks of unclear regulatory status in the wake of a resolution's passage are significant: previous pro-development plans completely eliminated the Colville River Special Area, shrunk the Teshekpuk Lake Special Area, and opened additional areas in the Teshekpuk Lake Special Area and elsewhere to new oil and gas leasing. Threats to the Teshekpuk Lake Special Area would not only negatively impact the fragile and rapidly changing ecosystem, but also the Teshekpuk Caribou Herd and other important wildlife, which are vital subsistence resources for Alaska Natives.

The CRA is not the tool that should dictate the future of the Western Arctic. For the bulk of the last decade, management of this landscape has been driven by management plans crafted based on robust community and public feedback, scientific input, and the incorporation of

Traditional Knowledge from affected communities. If the 2022 plan is struck via the CRA, it could call into question the status of leases, permits, rights-of-way, and other authorizations issued under the invalidated plan, leaving agencies, industry, and communities mired in costly litigation and uncertainty over fundamental questions of management authority. Passage of this resolution will unleash regulatory chaos at a time when clarity could not be more important—as oil and gas megaprojects like Willow proceed, despite its projected revenue recently being [quietly cut by 50% by the state of Alaska](#). Taxpayers deserve clarity on the economic, environmental, and subsistence impacts of development in the Reserve, and overturning the IAP using the CRA would make responsible management decisions even more difficult.

The CRA should not be used to override carefully crafted decisions related to the management of federal public lands, such as the Reserve. Such decisions should be based on the best available science, Traditional Knowledge, and robust public input—not politics. Using the CRA on this leasing and management plan means Congress is dictating a change to BLM's management for the Reserve's oil and gas activities that overrides input from communities, scientists, and even industry. Using the CRA in this manner would be inconsistent with responsible public land management and would create significant uncertainty for agencies, the public, and industry alike. Federal land managers must be able to adjust their approach based on current scientific findings, local community needs, new information, economic conditions, and industry interests. We urge you to oppose this misuse of the CRA.

Thank you,

Alaska Wilderness League
350 Bay Area Action
350 Chicago
350 Colorado
350 Triangle
350Hawaii
Alaska Soles
Great Old Broads for Wilderness
Alaska Wildlife Alliance
American Bird Conservancy
Animals Are Sentient Beings, Inc.
Between the Waters
Californians for Western Wilderness
CASE
Citizens Alliance for a Sustainable
Englewood
Center for Biological Diversity
Climate Reality Project - Northern Colorado
Chapter
Coalition to Protect New York
Colorado Coalition for a Livable Climate

Concerned Health Professionals of
Pennsylvania
Conservation Lands Foundation
Copper River Wild Salmon Co.
Defenders of Wildlife
Earth Ethics, Inc.
Earthjustice
Elders Climate Action
Elders Coalition for Climate Action
Endangered Species Coalition
Environmental Protection Information
Center- EPIC
Fairbanks Climate Action Coalition
FCLC
FoCo Trash Mob, a Beyond Plastics Affiliate
Fox Valley Citizens for Peace & Justice
(Illinois)
FracTracker Alliance
Friends of the Earth Action
Friends of the Lost Coast
Good Neighbor Steering Committee of
Benicia

Healthy Ocean Coalition
International Marine Mammal Project of
Earth Island Institute
Intheshadowofthewolf
Klamath Forest Alliance
Larimer Alliance for Health, Safety, and the
Environment
League of Conservation Voters
Michigan Interfaith Power & Light
Michigan Sustainable Business Forum
Minnesota Division Izaak Walton League of
America
MoveOn.org
HobokenRESIST!
Nassau Hiking & Outdoor Club
Natural Resources Defense Council
NC Climate Justice Collective
New Mexico Wild
New Mexico Wildlife Federation
New York Progressive Action Network
NYPAN of the Southern Finger Lakes
Occupy Bergen County
Ocean Conservation Research
Oil and Gas Action Network
Olympic Peninsula Prairies
Orca Network
Partnership for Policy Integrity
Patagonia
People Over Petro Coalition
Physicians for Social Responsibility
Colorado
Putnam Progressives
Resist the Pipeline
Resource Renewal Institute
San Luis Valley Ecosystem Council
Save The Pine Bush (Albany, NY)
Seven Circles Foundation
Sierra Club
South Asian Fund For Education
Scholarship and Training Inc
Southern Utah Wilderness Alliance
Sovereign Ifñupiat for a Living Arctic (SILA)
St.Paul Bird Alliance
Standing Trees

Sustainable Action Consulting PBC
The Enviro Show
The Ocean Project
The People's Justice Council
The Wilderness Society
Tongass Women for Forests WECAN
International
Trustees for Alaska
Tuleyome
Turtle Island Restoration Network
Union for Reform Judaism
Unitarian Universalists for a Just Economic
Community
Unite North Metro Denver
Wild Cumberland
Wilderness Watch
Wildlife for All
The Alaska Center
Elders Climate Action Maryland
Climate Reality Greater Maryland
Climate Reality
Texas Impact
Climate Reality Greater MD
The United Methodist Church - General
Board of Church and Society