

# **Maximizing Protection in the National Petroleum Reserve-Alaska:**

*BLM Report*

*Based on Public Submissions in Response to  
the July 2024 Request for Information*

**U.S. Department of the Interior**

January 2025

**TABLE OF CONTENTS**

**I. INTRODUCTION ..... 2**

    The law requires the BLM to mitigate adverse effects of development ... 2

    The BLM has a duty to assure maximum protection of significant resource values in Special Areas ..... 3

**II. PUBLIC INPUT ..... 5**

    The BLM’s Request for Information ..... 5

    Summary of RFI Responses ..... 6

        Native-Led NGOs ..... 6

        National conservation NGOs ..... 10

        Other submissions ..... 11

**III. CONCLUSIONS ..... 12**

Appendix A ..... 15

## I. INTRODUCTION

For millennia, the 23-million-acre area we now know as the National Petroleum Reserve in Alaska (NPR-A or Reserve) has provided food and resources for Alaska Native people. Forty Alaska Native villages continue to rely upon the area for the customary and traditional use of wild renewable resources for food, shelter, fuel, clothing, tools, or transportation. Today, the NPR-A is home to two large caribou herds, polar bears and an abundance of other wildlife. Millions of migrating shorebirds and thousands of waterfowl rely on it for breeding grounds.

The Department of the Interior, through the Bureau of Land Management (BLM), has been the steward of the Reserve for nearly 50 years. In 1976, Congress passed the Naval Petroleum Reserves Production Act (NPRPA). That law transferred management of the NPR-A from the U.S. Navy to the Secretary of the Interior. It provided direction for administering an oil and gas program while specifically recognizing the importance of protecting the other resources in the Reserve. The BLM has been responsible for the surface management of the Reserve and protection of its surface values since 1977.

### **The law requires the BLM to mitigate adverse effects of development**

When the Bureau anticipates that the exploration or production of oil and gas will have adverse effects on surface resources in the NPR-A – including, but not limited to, subsistence, environmental, fish and wildlife, historical and scenic surface resources – the Secretary of the Interior is required to take action to safeguard them and has broad discretion in how to do so:

*such conditions, restrictions and prohibitions as the Secretary deems necessary or appropriate to mitigate reasonably foreseeable and significantly adverse effects of proposed oil and gas activities on the surface resources of the National Petroleum Reserve in Alaska.*

42 U.S.C. § 6506a(b) (emphasis added)

The BLM manages the NPR-A through an Integrated Activity Plan (IAP). The IAP was most recently updated in a 2022 Record of Decision (ROD), which relied on the environmental analysis and evaluation of impacts on subsistence use under Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA), which were completed in 2020. The 2022 IAP ROD acknowledged the impact of the oil and gas program on resources within the NPR-A across the range of alternatives evaluated.

The NPRPA and the IAP acknowledge the importance of surface resources within the NPR-A, including subsistence, and the potential for impacts from oil and gas development on those resources.

## **The BLM has a duty to assure maximum protection of significant resource values in Special Areas**

The NPRPA also directed the Secretary to manage Special Areas of the Reserve, to “*assure the maximum protection of such surface values* to the extent consistent with the requirements of this Act for the exploration of the reserve.” 42 U.S.C. § 6504(a) (emphasis added)

In short: Congress required the Secretary to balance the need for exploration for and production of oil and gas within the Reserve against the need to protect significant resource values, including wildlife, natural resources, recreational opportunities, historic and scenic values, and subsistence use by those who rely on its fish and other wildlife for hunting and harvesting of resources, including through designation and management of Special Areas.

Currently, there are five Special Areas in the NPR-A – Colville River, Kasegaluk Lagoon, Peard Bay, Teshekpuk Lake and Utukok River Uplands. For each area, the BLM has identified significant resource values, including wildlife habitat, recreational access, and cultural resources. A discussion of existing Special Areas and their significant resource values can be found at 43 CFR 2361.20.

In 2024, the BLM issued a rule to update its management framework for the NPR-A, a critical step in ensuring that the Bureau continues to meet its legal duty to avoid harm to surface resources and provide maximum protection to these resources and uses in Special Areas.

In addition, in July 2024, the BLM issued a Request for Information (RFI), seeking submissions from the public on how best to ensure maximum protection of and mitigate adverse impacts to surface resources in the NPR-A.

The BLM received a robust response from the public to its RFI. The purpose of this report is to provide an overview of the input received, and outline conclusions and next steps.

Based on a comprehensive review of the public submissions, including extensive scientific information provided to the Bureau, the BLM has determined that there are additional significant resource values in the Special Areas that require additional protection and proposed new and expanded Special Areas in the NPR-A that merit further evaluation for designation and additional protection.

In particular, the BLM received substantial input tied to the importance of subsistence - resources, access and uses. Section 803 of ANILCA defines “subsistence use” as:

the customary and traditional uses by rural Alaska residents of wild renewable resources for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation; for the making

and selling of handicraft articles out of nonedible byproducts of fish and wildlife resources taken for personal or family consumption; for barter, or sharing for personal or family consumption; and for customary trade. (16 U.S.C. 3113)

Subsistence encompasses both natural and cultural values, relying on the fish and wildlife and other surface resources in the NPR-A while representing a broader significance to the community. With regard to subsistence, the IAP ROD provides:

As with the plan adopted in the 2020 IAP/ROD, the plan adopted in this ROD may significantly restrict subsistence uses for the communities of Nuiqsut, Atqasuk, Utqiagvik, and Wainwright with respect to potential reductions in the availability of subsistence resources and (for Nuiqsut) with respect to limitations on subsistence user access. (2022 ROD, p. 16)

The BLM regulations governing the NPR-A also highlight the importance of subsistence, which is included in the definition of a significant resource value. (43 CFR 2361.5). The regulation requires management of Special Areas to protect subsistence resources, use, and access, and encourages co-stewardship for management of subsistence in Special Areas and across the NPR-A. (43 CFR 2361.50, 2361.60). One of the proposals submitted to the BLM (discussed in detail below) referred to “the importance of subsistence to Inupiat tradition, health, and culture.”

The Bureau is therefore:

- Recognizing subsistence as a significant resource value in existing Special Areas and in new and modified Special Areas proposed in responses to the RFI;
- Taking immediate steps to implement interim measures to protect subsistence as a significant resource value in existing Special Areas and in the proposed new and modified Special Areas;
- Maximizing opportunities for co-stewardship in current and potential Special Areas; and,
- Commencing a process under the new NPR-A Rule to evaluate maximum protection measures to manage a subsistence significant resource value in proposed additions to the existing Teshekpuk Lake, Colville River, Utukok River Uplands, and Peard Bay Special Areas, as well as in a proposed new Nuiqsut Subsistence Use Special Area (see map attached as Appendix A). The recognition of the significant resource value in these areas indicates the suitability of the proposed new and modified Special Areas.

These actions are both necessary and appropriate to fulfill the BLM’s dual legal mandates – to conduct an oil and gas leasing program while ensuring maximum protection of significant resource values in Special Areas. They also support the BLM in meeting its broader obligation to mitigate reasonably foreseeable and significantly adverse effects of proposed oil and gas activities on surface resources.

## II. PUBLIC INPUT

### The BLM's Request for Information

In April 2024, the BLM issued a [rule](#) updating its approach to managing the National Petroleum Reserve in Alaska. The purpose of the updated rule was to bring consistency to the management of the NPR-A, which has long been governed by multiple statutes, standards, regulations, plans and guidance documents. In addition, the BLM promulgated the rule to ensure that it continues to meet its statutory duties both under the NPRPA and the Federal Land Policy and Management Act (FLPMA).

Conditions in the Arctic have changed dramatically since the 1970s, when those laws were passed. These changes, including impacts from climate change, affect natural environments and Native communities.

In issuing the rule, the BLM also provided direction to ensure maximum protection of Special Areas, as mandated by the NPRPA, including through procedures for the designation, de-designation, amendment and change in management of new Special Areas within the Reserve, and to provide clear guidelines for development that safeguards surface resources.

The rule provides the BLM more clarity on how, whether, and when to undertake changes to Special Area designations, including by undertaking a process to amend the Integrated Activity Plan (IAP) governing the NPR-A, or by using a separate process. (See 43 CFR 2361.30.) Notably, while the rule provides specificity on how the BLM can fulfill its obligation to protect surface resources, including through designation and management of Special Areas, the BLM's mandate, authority and discretion are tied to the NPRPA and are not dependent on the rule.

In its July 2024 [Request for Information](#), the BLM asked the public to submit feedback on how best to protect the NPR-A's Special Areas and significant resource values. The BLM invited public response on these questions:

1. Are the current significant resource values protected by existing Special Areas comprehensive, or do additional significant resource values exist?
2. Are existing Special Areas sufficient, or does BLM need to modify the boundaries or management?
3. Does BLM need to designate new Special Areas, and if so, please identify public lands that may qualify.
4. Does BLM's legal duty of "maximum protection of significant surface resource values" require it to identify and designate new Special Areas in the NPR-A?

By issuing the RFI, the BLM did not initiate or commit to initiating a process under 43 CFR 2361.30, but sought instead to gather information on whether to initiate a process to consider changes to the Special Areas identified in the current IAP, including significant resource values. The BLM also made clear that should it determine to take further action

in response to the RFI, it would follow the process set out in the rule, including applicable opportunities for public engagement and Tribal consultation.

### **Summary of RFI Responses**

The BLM received close to 80,000 comments (Click on “Submitted letters and information [here](#)) and a few unique [responses](#) to the RFI. These detailed responses, relying on Indigenous Knowledge as well as additional current science, recommended that the BLM expand protected areas around Special Areas, create new Special Areas, and recognize additional significant resource values.

The Bureau also received a handful of responses, many of which were less detailed or less responsive to the RFI, that rejected the need for the BLM’s request for information altogether.

### **Native-led NGOs**

Residents of local Alaska Native communities in and around Nuiqsut provided extensive submissions supported by Traditional Knowledge, also referred to as Indigenous Knowledge.

The following is a general overview of proposals submitted by the Inupiat group Grandmothers Growing Goodness, Sovereign Iñupiat for a Living Arctic (SILA), and the grassroots Alaska Native organization Native Movement (collectively, “Native-led NGOs”).

The proposal included an extensive appendix of Traditional Knowledge, and explained that “[t]he collection of knowledge in these comments draws largely from those who are known in their communities to be knowledge holders and have years of experience using and observing natural resources...,” and have been “chosen to represent their communities in the NPRA Subsistence Advisory Panel, the NPRA Working Group, the Western Arctic Caribou Herd Working Group, the North Slope Advisory Committee to the Alaska Department of Fish and Game.” Recommendations of Native-led NGOs, Traditional Knowledge Appendix, p. 2. The knowledge holders, as they were referred to in the submission, provided the BLM with a series of observations on the impacts of climate change, including: growth rate of upland vegetation, red tide, zooplankton, river erosion, changing permafrost affecting travel and access to traditional hunting areas, sea level rise, erosion and warming rendering ice cellars unusable, fewer lakes, dry tundra, thin ice, changes in habitat, migration and subsistence patterns.

- **The BLM should recognize all significant resource values** in existing Special Areas, including Teshekpuk Lake and Colville River Special Areas. The responses included key information on the wildlife resources (such as migratory birds and marine mammals) in all existing Special Areas:

### **1. Preservation of Inupiat life, health, safety, culture and tradition**

Native-led NGOs called for the BLM to recognize this new significant resource value, citing these intangible, fundamental values as essential for preservation. They note that it is not just the fish and wild food Alaska Natives harvest, but also, the traditions and skills passed down between generations that are potentially threatened by oil and gas activity and by the changing climate in the Arctic.

By joining adults and elders in the experience of hunting and fishing, young community members learn not only practical skills but also cultural values, language, and leadership qualities. These practices strengthen community bonds and cooperation, within and between villages. Many of these areas have been used by parents, grandparents and so on; being cut off from these areas is the same as being cut off from familial history and generational connection to those specific areas.

– Recommendations of Native-led NGOs, p.4

The submission noted that the health and psychological well-being of all who live in this region are at stake, in part because of food insecurity that is exacerbated by climate change, but also from manmade threats such as diseased wildlife observed in proximity to industrial activity.

### **2. Protection of Caribou habitat – Teshekpuk migration corridors, wintering grounds**

Native-led NGOs called for the recognition of broader caribou habitats as significant resource values, beyond currently identified core habitats in order to encompass habitats that are relevant to different stages of the caribou life cycle. They cited the fall migratory path, especially the one leading to Anaktuvuk Pass and offered observations on the negative impacts of roads and pipelines on caribou.

They also emphasized that there is a natural variability in migration that can shift further with development and a changing climate and stated that it is therefore important to maintain a broad space for migration, free from obstacles.

### **3. Fish Habitat**

Native-led NGOs called for identifying all fish habitat – not just overwintering areas - as a significant resource value in the Colville River, Teshekpuk Lake and Proposed Nuiqsut Subsistence Use Special Areas, citing extensive traditional knowledge about fishing practices there and the importance of subsistence fishing. Observations throughout the submission by Native-led NGOs cited locations of flounder, salmon, broad whitefish, arctic cisco (qaaktaq), arctic char,



arctic grayling, Dolly varden and burbot. The proposal also called for limits on water withdrawals.

Beyond noting the importance of fish and caribou, knowledge holders offered extensive observations on the importance of supporting other wildlife populations in these and other Special Areas, including: moose, muskox, hares, lynx, birds, walrus, beluga, seals, wolverine, wolf, geese, ducks and grizzly bears. They also discussed harvesting meat and fur trapping, as well as protecting critical habitat for the nesting and molting of waterfowl.

- **The BLM should designate a new Nuiqsut Subsistence Use Special Area**

Native-led NGOs asserted that the BLM should designate a new Nuiqsut Subsistence Use Special Area for subsistence around Nuiqsut in order to protect the resource values there that are critical to the human ecosystem within the NPR-A. They specifically cited residents' reliance on resources within a short range of the community, including moose, caribou and fish such as pink salmon.

They called for protecting from development portions of Fish Creek and Judy Creek that are not currently covered by the Teshekpuk Lake Special Area because of the habitat and the subsistence that takes place there. They also offered extensive observations on unprotected resources in multiple other locations they suggested should be incorporated into existing Special Areas or designated as new Special Areas, including: West of Utqiagvik, South of Deese Inlet, the Titaluk River and Qaababvik (mid-NPRA), South of Lake Teshekpuk, the Ikpikpuk and Chipp Rivers, areas around Wainwright and Atqasuk, and caribou migration corridors.

Native-led NGOs also called for expanding boundaries of existing Special Areas and establishing new ones around villages to provide a "margin of error" to account for variation and limitations related to climate change.

- **The BLM must enhance its maximum protection measures**

Native-led NGOs contended that BLM's current measures are ineffective, and do not provide maximum protection.

Despite the years of environmental review and BLM's identification of various mitigation measures throughout this time, the impacts from oil and gas activities to Nuiqsut have only grown worse.

– Recommendations of Native-led NGOs, p.9

They contended that studying effects is not the same as monitoring compliance with or effectiveness of mitigation measures and that lack of transparency undercuts public participation. The groups suggested that the BLM analyze how effective its mitigation measures are, share caribou monitoring information, halt industrial activity during

subsistence times, place limits on roads, air traffic and ice bridge crossings, and prohibit industrial activity and infrastructure as needed.

Native-led NGOs further identified conflicts between subsistence use and the Willow Road.

Many people use the road that extends west from Nuiqsut for hunting. But this does not mean all roads are always good for subsistence. When oil field construction is taking place, the road is a continuous stream of industrial vehicles. This traffic poses a safety risk for those who use the road, as the trucks loom over residents' four-wheelers and spit out rocks that break windshields and run people off the road.

Often, the road is closed to allow unimpeded use for industry. At other times, even when the road is purportedly open, industry workers will selectively block access to the road, turning some villagers away but allowing others to pass.

To ensure that the road does not harm subsistence, it should be closed to industrial use throughout the summer, to allow free and undisturbed access to traditional lands.

- Recommendations of Native-led NGOs, p.10

Additional measures the Native-led NGOs discussed to protect subsistence resources include: prohibiting pipelines in core caribou habitat around Teshekpuk Lake and prohibiting industrial road traffic during spring caribou migration, calving and post-calving.

They further called for protecting human health through stronger protections from air pollution and food contamination, and they highlighted the importance of power sharing for self-determination.

The groups also singled out the Sentinel Hill Area within the Colville River Special Area, asserting that it is particularly notable for fishing and caribou and should be protected from any industrial activity. And they noted that Ocean Point is an important subsistence location that has been turned into "an industrial river crossing." They noted that "hunters have relied on this lookout point to scan the tundra for animals, but with the heavy traffic at the crossing, the animals don't come to the area anymore. The value of this area is destroyed even once the winter industrial activity has ended, because staged equipment and soil and vegetation damage remain."

(Recommendations of Native-led NGOs, p.12)

Finally, Native-led NGOs made multiple additional recommendations for maximum protection measures to safeguard resources. (*See* Recommendations of Native-led NGOs, pp.18-24)

- **The BLM should create a Governing Commission**

The groups called on the BLM to create a Governing Commission that would give Tribes a role in decision-making for subsistence harvests and land use management within 3 Special Areas (Teshekpuk Lake, Colville River, and the proposed Nuiqsut Subsistence Use Special Area).

## **National Conservation NGOs**

Several conservation NGOs (collectively, “national conservation NGOs”) submitted a combined response to the BLM, offering a strong scientific foundation for expanding existing Special Areas. These organizations enumerated multiple threats to significant resource values from oil and gas development and from climate change. They also cited Indigenous Knowledge, numerous scientific journals, and published government studies in support of recognizing these values.

The groups offered the following proposals:

- **The BLM should make multiple expansions of four existing Special Areas**

Citing the BLM’s legal duty, national conservation NGOs asserted that the Bureau should focus on the areas and values that are the most threatened by oil and gas development:

Because the Naval Petroleum Reserves Production Act requires the Bureau of Land Management to provide maximum protection from the adverse effects of oil and gas development and to mitigate the impacts of such activities,<sup>3</sup> the areas and the significant resource values most at risk from development impacts merit particular attention.

– national conservation NGOs recommendations, p.1

### **1. Teshekpuk Lake Special Area**

National conservation NGOs asserted that the BLM should make three expansions to the Teshekpuk Lake Special Area: to protect Caribou Herd Migratory Pathways and Caribou Herd Calving Grounds—areas at acute risk of harmful impacts from oil and gas activities, and the Ikpikpuk River Headwaters, which contains significant resource values for raptor and shorebird habitat.

Within the area used by Nuiqsut for subsistence use, the groups identified subsistence hunting, fishing and gathering activities as significant resource values. Other significant resource values they cited within the proposed expansions included: polar bear denning habitat, important habitat and movement corridors, nesting grounds for migratory birds, important wolverine denning habitat,

headwaters for downstream Broad Whitefish spawning, rearing and overwintering habitat, raptor and shorebird habitat.

## **2. Utukok River Uplands**

The national conservation NGOs further contended that the BLM should protect the significant resource value of the Western Arctic herd calving grounds in an expansion of the Utukok River Uplands Special Area.

## **3. Colville River**

With respect to Colville River, the national conservation NGOs recommended that the BLM expand the Special Area to protect the significant resource values of headwaters of downstream Broad Whitefish spawning, rearing and overwintering habitat, as well as important wolverine denning habitat.

## **4. Peard Bay**

A proposed expansion of Peard Bay, according to the national conservation NGOs, should be made to protect the significant resource values of shorebirds and waterfowl habitat, polar bear denning habitat, important habitat and movement corridors, as well as marine mammal haul-out areas.

- **The BLM should enhance its maximum protection measures**

For each of the significant resource values they discussed within the Special Areas, national conservation NGOs proposed a series of maximum protection measures, including actions such as: prohibiting permanent gravel roads, restricting flights on a seasonal basis, restricting winter travel depending on weather conditions, prohibiting pipelines or permanent facilities for oil and gas infrastructure, seismic exploration, requiring aerial infrared surveys, limits on construction activities using heavy equipment, requiring marine mammal monitors, restrictions on water withdrawals and ice roads, restrictions on sand and gravel mining and removal, and ensuring co-stewardship.

The groups further proposed that the BLM prohibit waivers of or exceptions to maximum protective measures and refrain from issuing permits until making a final determination following a Special Areas process.

## **Other Submissions**

The BLM received [additional submissions](#) providing input on next steps. Multiple other individuals and groups offered submissions consistent with portions of these proposals—BLM received numerous recommendations, for example, that specifically supported a Nuiqsut Subsistence Use Special Area.

Likewise, the BLM received comments from some entities opposing any change in management or protections in the NPR-A, largely on procedural grounds. In addition, they asserted that no modifications are necessary and that new measures by the BLM would disadvantage industry interests.

In addition, a research group proposed that the BLM consider permafrost soils as a significant resource value, citing the threat to infrastructure, geological resources, wildlife habitats and subsistence activities if permafrost is compromised.

### **III. CONCLUSIONS**

The BLM conducted a comprehensive review of all the public submissions received in response to the July RFI, including those from entities opposing changes to Special Areas and significant resource values.

In a changing climate, the BLM must rely on up-to-date data to decide how best to balance the need to protect the resources people depend upon for subsistence, while administering an oil and gas program.

Upon reviewing the detailed observations and scientific data supporting the submissions, BLM finds that both the science and the law support expanded Special Areas and recognition of additional significant resource values in the NPR-A.

The best available current information requires the BLM to take additional steps to ensure maximum protection of significant resource values in the NPR-A and to mitigate reasonably foreseeable and significantly adverse effects of proposed oil and gas activities.

#### **The Bureau therefore concludes:**

1. **“Subsistence” will be recognized as a significant resource value in existing and proposed Special Areas.**

The BLM received persuasive information, including Indigenous Knowledge, on the importance of this value and its presence in both existing Special Areas and proposed new and modified Special Areas. Protecting subsistence use is indeed a central reason for protecting Special Areas altogether and is one of the significant resource values specifically identified in the NPRPA. The BLM will commence a process to recognize subsistence as a significant resource value and develop appropriate maximum protection measures focused on caribou migration corridors, fish, waterfowl and marine mammals. This process will include Tribal consultation and public participation, including compliance with the National Environmental Policy Act and other applicable laws.

2. **The Bureau will take steps to maximize opportunities for co-stewardship** in the existing Special Areas and proposed modified Special Areas under

consideration, as the rule encourages, both around Special Areas and around subsistence more broadly across the NPR-A. The submissions reinforce the value of incorporating Indigenous Knowledge into the management of subsistence.

3. **The Bureau will commence a process under the NPR-A rule to recognize new significant resource values, evaluate proposed additions to existing Special Areas, including a potential Nuiqsut Subsistence Use Special Area, and ensure maximum protection measures under the process set out in the rule for further consideration of information and potential designations.**

Based on the recognition of subsistence as a significant resource value in existing and proposed Special Areas, the BLM will further evaluate appropriate maximum protection measures. The presence of the significant resource value also supports the designation of new Special Areas (see 43 CFR § 2361.30(a)(4), (b)), including the potential Nuiqsut Subsistence Use Special Area and the other proposed Special Area expansions in Teshekpuk Lake, Colville River, Utukok River Uplands, and Peard Bay. The BLM's evaluation of the new and modified Special Areas will consider the proposed areas, identifying corresponding significant resource values that include but are not limited to subsistence, and developing maximum protection measures for the significant resource values. The process will include Tribal consultation and public participation, including compliance with the National Environmental Policy Act and other applicable laws.

The proposed Nuiqsut Subsistence Use Special Area encompasses the Native-led NGOs' proposed Nuiqsut Subsistence Use Special Areas and the national conservation NGOs' proposed Teshekpuk Special Area Expansions A and B. These areas as proposed largely overlap, so the BLM is evaluating a combined potential Special Area that would most efficiently safeguard resource values in a potential new Special Area. The proposals focused on protecting caribou migration and calving in areas that are already substantially leased.

4. **Interim measures will be adopted** to protect the subsistence significant resource value in existing Special Areas, proposed expansions to the Teshekpuk Lake, Colville River, Utukok River Uplands, and Peard Bay Special Areas, and the proposed Nuiqsut Subsistence Use Special Area. Any interim measures must be consistent with the governing management prescriptions in the IAP and comply with the terms of the applicable leases, development plan and permits.

The interim measures will remain in place until the BLM completes its process to consider designating these new or expanded proposed Special Areas.

The BLM appreciates the detailed proposals based on high quality science, including Indigenous Knowledge, that we received in response to the RFI, as well as the thousands of individual comments we received. The conclusions informed by the responses to the RFI will inform BLM's management of the NPR-A. The Bureau looks forward to

working with the public and through Tribal co-stewardship to take the necessary actions developed in this Report.

# Appendix A

## Proposed New and Expanded Special Areas

1/16/2025

