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VIA ELECTRONIC MAIL

February 19, 2024

TO: Arati Prabhakar
Director
White House Office of Science and
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1650 Pennsylvania Avenue
Washington, D.C. 20504

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1849 C Street NW-Mail Stop 4428
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Alondra Nelson
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1650 Pennsylvania Avenue
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Laura Daniel-Davis
Acting Deputy Secretary
U.S. Department of the Interior
1849 C Street NW
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Re: The Administration's Use of Indigenous Knowledge In Decision Making Violates Scientific Integrity Law and Guidance

Dear Dr. Prabhakar, Ms. Nelson, and Mr. Greenblatt,

Upon taking office, the Biden Administration “signal[ed] a clear commitment to science” and pledged sweeping initiatives to elevate the role of science in the federal government.¹ This vow sparked hope among the American public that objective scientific principles, not politics, would drive government decision making. However, it appears that actions have been far from consistent with these high-minded commitments and aspirations.

Protect the Public's Trust (PPT) is a nonpartisan organization dedicated to promoting ethics in government and restoring the public's trust in government officials. A loss of trust in public officials resulting from their abandonment of dispassionate, bedrock scientific principles in one area, can result in citizens rejecting or simply ignoring even the most scientifically sound directives in other areas. The consequences of a widespread loss of public trust in government information could have tragic results.

As noted above, it was heartening to all Americans when the Biden administration, within a day of taking office, announced its commitment to scientific integrity and evidence-based

¹ Jim Daley, “Biden Elevates Science in Week One Actions,” Scientific American, Jan. 28, 2021, <https://www.scientificamerican.com/article/biden-elevates-science-in-week-one-actions/>.



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polycymaking.² It was equally disheartening, however, when the White House, through the Council on Environmental Quality (CEQ) and Office of Science and Technology Policy (OSTP), subsequently backed away from its own policy commitment by providing guidance that encouraged agencies to “promote and enable a government-wide effort to improve the recognition and inclusion of Indigenous Knowledge” in research, policy, and other decision making.³ The Guidance makes clear that “Agencies do not need to judge, validate, or evaluate Indigenous Knowledge using other forms of knowledge in order to include Indigenous Knowledge in Federal policy, research, or decision making.”⁴

A prime example of the improper use of indigenous knowledge is found in the Department of the Interior’s (“Interior”) recent decision to cancel seven oil and gas leases in Alaska.⁵ Interior claimed that its environmental review supporting the cancellations was made with “the best available science and in recognition of the Indigenous Knowledge of the original stewards of this area”⁶ As demonstrated below, however, equating indigenous knowledge with objective data and science is in conflict with principles of scientific integrity found in federal law and Interior’s own guidance on scientific integrity in place at the time the leases were cancelled.

I. The Biden Administration’s Initial Commitment to Scientific Integrity

At the outset of his administration, President Biden signed the Scientific Integrity Memorandum, which required “the highest level of integrity in all aspects of executive branch involvement with scientific and technological processes” and mandated that “[s]cientific findings should never be distorted or influenced by political considerations.”⁷ The Scientific Integrity Memorandum does not mention, let alone enforce, use of indigenous knowledge.

² The White House, “Memorandum on Restoring Trust in Government Through Scientific Integrity and Evidence-Based Policymaking,” [whitehouse.gov](https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/memorandum-on-restoring-trust-in-government-through-scientific-integrity-and-evidence-based-policymaking/), Jan. 27, 2021, <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/memorandum-on-restoring-trust-in-government-through-scientific-integrity-and-evidence-based-policymaking/>. (“Scientific Integrity Memorandum”).

³ Arati Prabhakar and Brenda Mallory, “Implementation of Guidance for Federal Departments and Agencies on Indigenous Knowledge,” [whitehouse.gov](https://www.whitehouse.gov/wp-content/uploads/2022/12/IK-Guidance-Implementation-Memo.pdf), Nov. 30, 2022, <https://www.whitehouse.gov/wp-content/uploads/2022/12/IK-Guidance-Implementation-Memo.pdf>.

⁴ Arati Prabhakar and Brenda Mallory, “Guidance for Federal Departments and Agencies on Indigenous Knowledge,” [whitehouse.gov](https://www.whitehouse.gov/wp-content/uploads/2022/12/OSTP-CEQ-IK-Guidance.pdf), Nov. 30, 2022, 16, <https://www.whitehouse.gov/wp-content/uploads/2022/12/OSTP-CEQ-IK-Guidance.pdf>. (“OSTP Guidance”).

⁵ Department of Interior, “Biden-Harris Administration Takes Major Steps to Protect Arctic Lands and Wildlife in Alaska,” [doi.gov](https://www.doi.gov/pressreleases/biden-harris-administration-takes-major-steps-protect-arctic-lands-and-wildlife-alaska), Sept. 6, 2023. <https://www.doi.gov/pressreleases/biden-harris-administration-takes-major-steps-protect-arctic-lands-and-wildlife-alaska>. (“Press Release”).

⁶ *Ibid.*

⁷ Scientific Integrity Memorandum, preamble.



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In accordance with the Scientific Integrity Memorandum, in January 2023 OSTP released “A Framework for Federal Scientific Integrity Policy and Practice” (“Framework”),⁸ which established the definition of scientific integrity for the entire federal government as

the adherence to professional practices, ethical behavior, and the principles of honesty and objectivity when conducting, managing, using the results of, and communicating about science and scientific activities. Inclusivity, transparency, and protection from inappropriate influence are hallmarks of scientific integrity.⁹

A “critical policy feature” of the Framework’s approach to building a culture of scientific integrity is promoting the transparent and free flow of scientific information.¹⁰ “[A]ccuracy and objectivity of science” are listed as the ultimate goals of this policy.¹¹

The Framework mentions the term “Indigenous Knowledge” only once and makes clear that the inclusion of such different modes of science must meet “the same high standards of scientific integrity that traditional modes are expected to uphold.”¹²

II. Obligations of Federal Agencies Under the Information Quality Act and Interior’s Information Quality Directives

The Information Quality Act requires agencies to make decisions using rules based on reliable sources of information and is “designed to ensure that the Federal Government relies on information of appropriate quality for the decision being made.”¹³ The Act requires agencies to create and promulgate their own rules that would, among other things, “improve the integrity, quality, and utility of information to all users within and outside the agency....”¹⁴

In conformity with the Act and OMB Guidance, Interior adopted Information Quality Guidelines, which require the Department to “[u]se the best available science and supporting studies conducted in accordance with sound and objective scientific practices, including peer-reviewed studies where available” and “[u]se data collected by standard and accepted methods or best available methods.”¹⁵ Interior’s website identifies the Guidelines as a governing authority for the

⁸ The White House, “A Framework for Federal Scientific Integrity Policy and Practice,” Scientific Integrity Framework Interagency Working Group of the National Science and Technology Council, Jan. 2023, <https://www.whitehouse.gov/wp-content/uploads/2023/01/01-2023-Framework-for-Federal-Scientific-Integrity-Policy-and-Practice.pdf>.

⁹ Ibid. 8.

¹⁰ Ibid. 10, 14, 20, 22, 25, 45.

¹¹ Ibid. 10.

¹² Ibid. 30.

¹³ OSTP Guidance 20; citing 44 U.S.C. §§3504-3515.

¹⁴ 44 U.S.C. §3506(b)(C).

¹⁵ Department of Interior, “Information Quality Guidelines pursuant to Section 515 of the Treasury and General Government Appropriations Act for Fiscal year 2001.” https://www.doi.gov/sites/doi.gov/files/uploads/doi_information_quality_guidelines.pdf, at 2.



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Information Quality Act.¹⁶ Under the Guidelines, “information released by the Department *will* be developed only from reliable data sources based on accepted practices and policies, utilizing accepted methods for information collection and verification [and] ... *will* be reproducible to the extent possible.” (emphasis added)¹⁷ Interior’s Guidelines make no mention of indigenous knowledge.

Effective December 16, 2014, Interior adopted Chapter 3 of the Departmental Manual, “consistent with the Presidential Memorandum on Scientific Integrity, dated March 9, 2009, and the Office of Science and Technology Policy’s guidance memorandum, dated December 17, 2010.” This chapter declares,

Scientific information considered in Departmental decision-making must be robust, of the highest quality, and the result of as rigorous a set of scientific processes as can be achieved. Most importantly, the information must be trustworthy.¹⁸

The chapter’s Code of Scientific and Scholarly Conduct requires a pledge of decision makers:

(2) I will offer respectful, constructive, and objective review of scientific activities of employees I supervise and will encourage them to obtain appropriate peer reviews of their work. I will respect the intellectual property rights of others and will substantiate comments that I make about their work with the same care with which I carry out and report the results of my own activities.

(3) I will adhere to appropriate standards for reporting, documenting, and applying results of scientific activities used in decision making and ensure public access to those results in accordance with Departmental policy and established laws.¹⁹

Furthermore, on March 3, 2021, the acting Secretary of the Interior issued Secretarial Order 3397 to “promote scientific integrity” that “reaffirms and builds on the principles identified in [the Biden Scientific Integrity Memorandum].”²⁰ The Order does not mention indigenous knowledge and, as discussed above, the principles adopted in the Biden Memorandum are at odds with the use of indigenous knowledge. The Order requires all agencies at Interior to conduct their activities in accordance with scientific principles announced in “the six principles set forth in section 1 of the

¹⁶ <https://www.doi.gov/index.php/ocio/policy-mgmt-support/information-and-records-managment/iq>

¹⁷ *Ibid.* 1. Emphasis added.

¹⁸ Department of Interior, “Departmental Manual, Chapter 3: Integrity of Scientific and Scholarly Activities,” Dec. 16, 2014, https://www.doi.gov/sites/doi.gov/files/uploads/305_dm_3_final_revised_si_policy_12-16-14.pdf.

¹⁹ *Ibid.*

²⁰ Scott A. de la Vega, “Rescission of Secretary’s Order 3369 and 3369 Amendment A1, in order to promote scientific integrity,” March 3, 2021, [doi.gov, https://www.doi.gov/sites/doi.gov/files/elips/documents/so-3397-revoking-3369-in-order-to-promote-scientific-integrity-signed-508.pdf](https://www.doi.gov/sites/doi.gov/files/elips/documents/so-3397-revoking-3369-in-order-to-promote-scientific-integrity-signed-508.pdf).



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Presidential Memorandum on Scientific Integrity issued March 9, 2009;²¹ the four foundations of scientific integrity in government set forth in part I of the Memorandum on Scientific Integrity issued by the Director of the Office of Science and Technology Policy on December 17, 2010;²² and 305 DM 3 - Integrity of Scientific and Scholarly Activities.”²³ (Citations in footnotes added). Each of these documents stresses the importance of the scientific method, and the use of reliable, verifiable data. None mention the use of indigenous knowledge.²⁴

For her part, Department of the Interior Secretary Deb Haaland espoused the value of science in decision making. In an interview published in the Washington Post in October 2021, Secretary Haaland declared:

I have directed the USGS to “unleash the science!” Scientists need to be able to have the freedom to do what they do best — research, compile data, share it with the world, and use that data to help all of us make the best decisions for our planet now and for the future. I have expressed over and over again my support for the scientists and for the work they do.²⁵

III. OSTP and Interior’s Introduction of Indigenous Knowledge into Federal Decision Making

On November 30, 2022, the White House, through CEQ and OSTP, released new government-wide guidance “on recognizing and including Indigenous Knowledge in Federal research, policy, and decision making.”²⁶ OSTP Guidance defines “Indigenous Knowledge” as “a body of observations, oral and written knowledge, innovations, practices, and beliefs....”²⁷ Additionally, OSTP Guidance requires that agencies treat indigenous knowledge as “one of the many important bodies of knowledge that contributes to the scientific, technical, social, and economic advancements of the United States, and to our collective understanding of the natural world.”²⁸

²¹ Barack Obama, “Memorandum for the Heads of Executive Departments and Agencies 3-9-09,” March 9, 2009, whitehouse.gov, <https://obamawhitehouse.archives.gov/the-press-office/memorandum-heads-executive-departments-and-agencies-3-9-09>.

²² John P. Holdren, “Scientific Integrity,” obamawhitehouse.archives.gov, Dec. 17, 2010, <https://obamawhitehouse.archives.gov/sites/default/files/microsites/ostp/scientific-integrity-memo-12172010.pdf>.

²³ Department of Interior, “Departmental Manual,” doi.gov, Dec. 16, 2014, 3, https://www.doi.gov/sites/doi.gov/files/uploads/305_dm_3_final_revised_si_policy_12-16-14.pdf.

²⁴ On April 16, 2021, Interior Secretary Haaland executed Secretarial Order 3399, which emphasized the importance of tribal consultation in the NEPA process.

²⁵ Jacqueline Alemany and Theodor Meyer, “Eleven Questions for Deb Haaland,” Washington Post, October 15, 2021, <https://www.washingtonpost.com/politics/2021/10/15/eleven-questions-deb-haaland/>

²⁶ White House Council on Environmental Quality, “White House Releases First-of-a-Kind Indigenous Knowledge Guidance for Federal Agencies,” White House press release, December 1, 2022, <https://www.whitehouse.gov/ceq/news-updates/2022/12/01/white-house-releases-first-of-a-kind-indigenous-knowledge-guidance-for-federal-agencies/>.

²⁷ Ibid 4.

²⁸ Prabhakar and Mallory “Guidance for Federal Departments” 3.



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OSTP then takes this one step further by elevating indigenous knowledge to a plateau above empirical science:

Agencies do not need to judge, *validate*, or *evaluate* Indigenous Knowledge using other forms of knowledge in order to include Indigenous Knowledge in Federal policy, research, or decision making. (emphasis added)²⁹

OSTP's Guidance also denigrates the value of "Western science" by claiming it has "been used as a tool to oppress Tribal Nations and Indigenous Peoples"³⁰ and that it uses "methodological dogma."³¹ The Guidance does not identify any actual aspects of indigenous knowledge that advance the quality of federal decision making. Rather, the use of indigenous knowledge in federal decision making is justified due to the "marginalization of Indigenous Peoples, [and therefore] it is incumbent on Agencies to make sustained efforts to build and maintain trust..."³² The imperative to incorporate indigenous knowledge into federal decisions is further justified because "Tribes and Indigenous communities continue to experience the impacts of intergenerational trauma."³³ Notably, these justifications for use of indigenous knowledge do not claim the "knowledge" is verifiable or advances sound decision making for all Americans.

OSTP's Guidance also identifies specific statutes under which indigenous knowledge may be part of decision making, including the National Environmental Policy Act (NEPA), which requires agencies to analyze the environmental impact of Federal actions.³⁴

Most recently, the Department adopted a manual provision titled "Departmental Responsibilities for Consideration and Inclusion of Indigenous Knowledge in Departmental Actions and Scientific Research."³⁵ The provision recognizes, as it must, that Interior can only "[i]nclude IK in a manner that complies with federal laws, including Information Quality Act"³⁶ The manual provision expressly acknowledges, that "[u]nder the Information Quality Act, technical or scientific information, *including IK*, that is disseminated by Bureaus and Offices must generally meet the standards for objectivity, utility, and integrity set forth in the Department's Information Quality Guidelines." (emphasis added)³⁷ As discussed below, however, Interior's effort to inject indigenous knowledge into decisions that the law requires to be based on science is at odds with the Department's duties under the Information Quality Act and its own Guidelines.

²⁹ Ibid. 16.

³⁰ Ibid 5. "Indigenous Knowledge and non-Indigenous scientific methodologies share many common features."

³¹ Ibid.

³² Ibid. 8.

³³ Ibid. 9.

³⁴ Ibid. 6.

³⁵ [301 DM 7 Departmental Responsibilities for Consideration and Inclusion of Indigenous Knowledge in Departmental Actions and Scientific Research \(doi.gov\)](#)

³⁶ Ibid. 6.

³⁷ Ibid. 6. Emphasis added.



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IV. Interior's Use of Indigenous Knowledge in NEPA Review Resulting in Cancellation Seven Oil and Gas Leases in Alaska

On September 6, 2023, Secretary Haaland authorized the cancellation of seven oil and gas leases in Alaska.³⁸ Interior cited “legal deficiencies,” which included its NEPA analysis, and claimed the cancellations were “based on the best available science *and* in recognition of [] Indigenous Knowledge....” (emphasis added)³⁹ Interior also identified a Bureau of Land Management (BLM) Proposed Rule, which incorporated OSTP’s Guidance on indigenous knowledge.⁴⁰ If adopted, BLM’s Proposed Rule would require “BLM to rely on the best available scientific information, including Indigenous Knowledge” in *future* management of the area in Alaska where the leases are located.⁴¹ Given the inclusion of a definition of indigenous knowledge in the Proposed Rule is new, it appears that DOI had not previously promulgated legal authority for the use of indigenous knowledge in decision making for management of the area where the leases are located.

V. Analysis

Both the OSTP Guidance and BLM Proposed Rule allow for federal decision making based on subjective beliefs over and above evidence derived from application of the scientific method.⁴² Neither has the force of law necessary to supplant the requirements of the Information Quality Act, and both documents violate the basic tenets of the Biden Scientific Integrity Memorandum, that “Scientific and technological information, data, and evidence are central to the development and iterative improvement of sound policies, and to the delivery of equitable programs, across every area of government”⁴³ the ultimate goal of which is to reach “*evidence-based decisions* guided by the best available *science and data*.” (emphasis added)⁴⁴ The White House Guidance and BLM Proposed Rule are also at odds with the principles of scientific integrity adopted by Interior in its Guidelines, 2014 Manual, Secretarial Order 3397, and the authorities relied upon in the Order to define scientific integrity for the Department, none of which sanction the use of indigenous knowledge. Indeed, even Interior’s Department-wide manual provisions purporting to expand the use of indigenous knowledge recognize that any use of indigenous knowledge remains restrained by the principles of the Information Quality Act and Interior’s Guidelines that require objectivity,

³⁸ Press Release.

³⁹ Ibid.

⁴⁰ Department of Interior, “Management and Protection of the National Petroleum Reserve in Alaska,” blm.gov, 25. <https://www.blm.gov/sites/default/files/docs/2023-09/Proposed%20NPR-A%20Rule%20RIN%201004-AE95%20508.pdf>.

⁴¹ Ibid 33.

⁴² Interestingly, other religions are not included within the considerations that agencies are instructed to include in their analysis. Putting tribal religion above the religious tenants of Christians, Jewish people, Muslims, Buddhists, Sikhs, raises First Amendment concerns and discriminates against each and every other religion.

⁴³ Scientific Integrity Memorandum.

⁴⁴ Ibid. (emphasis added).



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utility, and integrity of information as well as repeatability of results to the extent possible.⁴⁵ The notion that “agencies do not need to judge, validate, or evaluate Indigenous Knowledge” is anathema to sound decision making and contrary to law.

As discussed above, indigenous knowledge is neither “data” nor “evidence-based.” Rather, it consists of an amalgam of “observations, oral and written knowledge, innovations, practices, and beliefs.”⁴⁶ In fact, agencies do not need to validate or even evaluate indigenous knowledge before assigning it unspecified weight in federal policy, research, or decision making.⁴⁷ In short, indigenous knowledge is not science. It is susceptible to use as a “black box” into which any subjective belief or observation could be introduced and given undefined weight in reaching a decision. Application of indigenous knowledge in this way would lead to the same kind of subjective and ultimately discredited decision making that has destroyed public trust in government institutions. It is precisely this type of result that the Information Quality Act is designed to prevent. Indeed, it is presumably for this reason that the administration announced its commitment to “restore” scientific integrity in the first place. The adoption of indigenous knowledge for use in federal decision making simply cannot be squared with the Information Quality Act, or the administration’s and Interior’s stated commitment to evidence-based scientific integrity.

That the OSTP Guidance denigrates “Western science” as a “tool to oppress Tribal Nations and Indigenous Peoples”⁴⁸ further demonstrates that use of indigenous knowledge is, in fact, not scientific. OSTP’s stated beliefs and noble intentions notwithstanding, the immutable laws of physics operate equitably for all “Peoples” and the scientific method is equally valid no matter where it is employed around the globe. As such, OSTP’s views are contrary to the Information Quality Act as well as the administration’s asserted commitment to scientific integrity and should be abandoned.

Even assuming for the sake of argument that the OSTP Guidance’s denigration of Western science as a tool of oppression is correct (which neither we nor the Information Quality Act do), the application of indigenous knowledge is plainly susceptible to abuse in ways that can harm others, including Tribal Nations and Indigenous Peoples that it purports to protect. A prime example is the Biden administration’s decision to cancel the leases in Alaska that could cause severe harm to the local economy and, ironically, injure a significant population of indigenous peoples – many of whom outspokenly opposed these cancellations for sound reasons of their own.⁴⁹ Whose

⁴⁵ [301 DM 7 Departmental Responsibilities for Consideration and Inclusion of Indigenous Knowledge in Departmental Actions and Scientific Research \(doi.gov\)](https://www.doi.gov/sites/doi.gov/files/uploads/doi_information_quality_guidelines.pdf) at 6;

https://www.doi.gov/sites/doi.gov/files/uploads/doi_information_quality_guidelines.pdf at 2

⁴⁶ OSTP Guidance 4; BLM Proposed Rule 53.

⁴⁷ Ibid 16.

⁴⁸ Ibid 5. “Indigenous Knowledge and non-Indigenous scientific methodologies share many common features.”

⁴⁹ Thomas Catenacci, “Alaskan Native Americans unleash on Biden admin’s climate agenda: ‘Communities and culture are at risk’”, Fox News (December 1, 2023) <https://www.foxnews.com/politics/alaskan-native-americans-unleash-biden-admins-climate-agenda>



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indigenous knowledge takes precedence in such cases is not clear and objective means for deciding between the two are not obvious. Does the indigenous knowledge of those in power or close to those in power, such as Secretary Haaland, have more weight or receive priority over the indigenous knowledge of those who are not? This situation would seem not only especially vulnerable to political agendas being injected into what should be a scientific analysis but also to indigenous knowledge being wielded as a weapon to oppress or harm those simply holding principled policy differences with those in power.

Further, how does Secretary Haaland's vow to "unleash the science" and allow scientists "the freedom to do what they do best — research, compile data, share it with the world, and use that data to help all of us make the best decisions for our planet now and for the future" comport with the use of unscientific systems to inform her decision making? These issues underscore the need for adherence to the "accuracy and objectivity of science" as the "ultimate goals" in federal decision making as the administration recognized upon first taking office.⁵⁰

Yet, the administration is now prepared to inject indigenous knowledge into the decision-making process without even a passing nod to evaluation of its reliability. By doing so, the administration reinforces the public's growing belief that subjective political goals that cannot be supported with empirical, scientific evidence are being propped up by recourse to indigenous knowledge. Sadly, the administration's approach also erodes whatever credibility indigenous knowledge might have.

The American public can rightly hold serious concerns that the Biden administration's decision making, though the use of indigenous knowledge, is susceptible to manipulation without even the pretense of adhering to scientific principles. The recent cancellation of leases in Alaska in reliance on indigenous knowledge is already being used as an example.⁵¹

VI. Conclusion

In light of the foregoing, we call on you to immediately open an investigation into the development of OSTP's indigenous knowledge Guidance and all instances of the use of indigenous knowledge

⁵⁰ The White House, "A Framework for Federal Scientific Integrity Policy and Practice," Scientific Integrity Framework Interagency Working Group of the National Science and Technology Council, Jan. 2023, <https://www.whitehouse.gov/wp-content/uploads/2023/01/01-2023-Framework-for-Federal-Scientific-Integrity-Policy-and-Practice.pdf>.

⁵¹ This was certainly the view of Kara Moriarty of the Alaska Oil and Gas Association, who stated in response to the cancellations that oil and gas industry has been under a "constant barrage of attack...by this administration..." Becky Bohrer, Matthew Daly and Georgina Fernandez, "Biden Administration Cancels Remaining Oil and Gas Leases in Alaska's Arctic Refuge," Alaska's News Source, Sept. 6, 2023, <https://www.alaskanewssource.com/2023/09/06/interior-cancels-remaining-leases-alaskas-arctic-national-wildlife-refuge/>. The Department of Interior's Press Release admits that the cancellation was due to "President Biden's historic conservation and climate agenda."



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in government decision making, including the Department of the Interior's decision to cancel leases in Alaska in reliance upon indigenous knowledge principles.

Sincerely,

Michael Chamberlain
Director
Protect the Public's Trust