## Tyler Priest Comments on Megan Black, "Interior's Proper Place: Response to Tyler Priest"

First and foremost, Black doesn't respond to my criticism that she ignored the records of the Office of the Secretary of the Interior (NARA RG 48) in her research. It is peculiar for a historian writing about the Department of the Interior to not consult these records, just like it would be for a scholar writing about U.S. foreign policy not to examine State Department records. Black cites only a couple documents from RG 48, both related to the Santa Barbara blowout of 1969. Because there are no other citations from that collection in the book, it looks as if she encountered those sources second-hand from another author's footnotes (possibly Teresa Spezio's Slick Policy: Environmental and Science Policy in the Aftermath of the Santa Barbara Blowout).

Black asserts in her book that the BLM/USGS experience in leasing and regulating oil on federal lands onshore was transferrable to federal lands offshore. RG 48 records indicate otherwise. Offshore was a totally different environment -- business, technological, labor, and natural -- and governed by separate statutes than federal lands onshore. Black's response to my criticism on this point is that "Interior officials [were] confident they could apply expertise from one context to another" and that their "bravado could and did align with their authority." The voluminous DOI documents related to the OCS (Outer Continental Shelf) Program reveal that these officials were *not* confident about applying their onshore expertise offshore. That is why they had to rely so much on the oil industry to create the program. Interior officials also do not come across as exhibiting "bravado" in the archival record. They appear as civil servants who were often overwhelmed by their statutory responsibilities, and uncertain about their authority, in governing this high-tech, multi-billion-dollar industry.

Black continues to insist in her response, as she does in the book, that there is evidence that Interior "surveyed" and "parceled" 20 million acres in the Gulf of Mexico. My rejection of the evidence for this, she states, is "bewildering." For proof, in the book and in her response, she cites one public document, the *Annual Report of the Secretary of the Interior, Fiscal Year ending 30 June 1954*. This document notes that "leasing maps" were prepared for areas off the coasts of Louisiana and Texas. What Black appears not to understand, however, is that Interior collected no data for these maps. She seems to think that by issuing "lease maps," the DOI/BLM plotted the bathymetry and geology of the Gulf, which it did not. Lease maps were simply a geometric grid superimposed on marine territory. The grid was called the Lambert Conformal Conic Projection, a system for plotting aeronautical locations promoted by the U.S. Coast and Geodetic Survey, adopted in the 1930s by most U.S. coastal states with a predominantly east-west expanse, and then extended seaward by the BLM (with industry guidance) for the first federal OCS lease sales. In other words, as I write in my review, the BLM did not "map" 20 million acres in the Gulf of Mexico. Although Black has an entire chapter on the OCS Program, she made little effort to understand how it worked.

Black chides me for citing a private email exchange with a retired Shell Oil executive to challenge her claims about oil companies' use of Landsat images to explore for oil. But that is not the only or main evidence I offered. I cited and summarized a recent essay from *Earth Imaging Journal* which explains why such "above surface' information hasn't been widely used

in the last 30-40 years of O&G exploration and operations." Black says in her response that she was talking about Landsat's first decade, not the 50 years of history to the present. But in her book, she provides evidence for only one instance where an oil company used Landsat, and then in her response, chastises me for my "questionable" refutation of historical sources. My point is that she should have supported her generalized claims about Landsat with historical sources.

Black emphasizes that DOI officials tested foreign mineral ores in the laboratory, introduced technologies to mechanize mining, and reformed mining codes. The steel and mining multinationals had their own, more-experienced geologists and mining engineers to test minerals and deploy new technologies. They didn't need or even pay much attention to the USGS/Bureau of Mines people, who mainly just got in the way. This dynamic is evident in State Department economic series records. To the extent that DOI officials were involved in revising mineral codes, which Black still does not substantiate convincingly, the countries where she says this happened were not mineral-rich places.

Black concedes in her response that Brazilian manganese was important to the United States in World War II, even though she ignores the subject in the book. Still, she avoids my argument that Brazilian manganese was just as important to U.S. foreign mineral policy during the early Cold War. The reason I "drill down" into this case is because it contradicts her conclusions about Point Four technical assistance and challenges her understanding of what the "state [mineral] procurement apparatus" was. Interior may have had a "multinational, multicommodity reach in Point Four," but this program was long on rhetoric, short on funding and political support, and inadequate to the task of encouraging foreign mineral development in the early 1950s. Black still does not acknowledge the agencies of the U.S. government that had actual power in foreign mineral "procurement" (NAC, NSRB, Eximbank, Army-Navy Munitions Board), which I discuss in my review. She also does not respond to the point I make about DOI's domestic orientation to strategic mineral stockpiling or my interview with John V.N. Dorr, the head of USGS foreign technical assistance during WWII, who referred to his program as a shoe-string operation. She doesn't directly address my argument that U.S. and World Bank financing and promotion of extraction-related infrastructure (railroads, ports, dams, roads) were the crux of U.S. foreign mineral and development policy.

Black asks: "Why was the Interior Department, the inward arm of the U.S. government charged with managing natural resources and Indigenous affairs, 'exterior' at all? Wasn't this a contradiction?" The answer is the Interior officials were basically the only ones in the federal government who had some technical expertise about strategic minerals, and therefore they were enlisted to perform studies in various foreign countries (technical advice about oil, however, was not entrusted to Interior). As I write in my review, these investigations took place mostly under Roosevelt and Truman and mainly to provide policymakers with independent sources of information. As Dorr admitted and the larger archival record shows, the role of DOI mineral experts in U.S. foreign mineral affairs was minor and meagerly funded. Interior's enabling statute prohibited the department from spending congressionally appropriated funds *outside* of the United States, so the department had to rely on what scraps other agencies were willing to provide. Black suggests that "technical assistance" was just as important as "allocations in spreadsheets" to "creating the conditions favourable to mining across a vast array of thresholds." This is more hyperbole. She offers little or no proof of the tangible contributions of government

technical assistance to the success of commercial mining projects, especially in the most critical minerals in the most critical places. Historians still need to follow the money.

In the latter part of her book, Black claims that the EPA "redirect[ed] important environmental regulatory capacities away from Interior" and that the DOE actually assumed Interior's responsibilities for developing mineral leasing regulations. As I noted in my review, these statements are false. In her response, Black shifts the ground to say that Interior secretaries, Walter Hickel and Stewart Udall (long after he was out of office), were *worried* that the establishment of the EPA and DOE *might* usurp DOI authority. That is very different than saying that the usurping actually happened, as she does in the book. Even then, Black does not cite Interior records or even relevant secondary sources in recounting these episodes. In her book, Black goes on to say that "Much of Interior's energy bureaucracy migrated over to the new agency [DOE]." This also is not true. The energy bureaucracy inherited by DOE came almost entirely from two independent agencies, the Federal Energy Administration (FEA) and the Energy Research and Development Administration (ERDA), not from Interior.

I stand by my assessment that *The Global Interior* exaggerates the international scope and influence of the DOI during the Cold War, and that its portrayal of Interior's place in the U.S. policy arena since the 1970s is uninformed.