

**Willow Project Letters of Support
November 2022**

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Alaska Native Organization Letters of Support

North Slope Borough

OFFICE OF THE MAYOR

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Harry K. Brower, Jr., Mayor

April 15, 2021

The Honorable Deb Haaland
Secretary, U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Submitted via: energyreview@ios.doi.gov

Re: Comments of the North Slope Borough on the U.S. Department of the Interior's Public Forum on the Federal Oil and Gas Program

Dear Secretary Haaland:

The North Slope Borough (Borough) submits the following comments in response to the U.S. Department of the Interior's (Department) March 25, 2021 virtual forum regarding the federal oil and gas program.¹ I sincerely hope that the Department will recognize, in its Interim Report and in its future work with respect to this program, the complicated but critically important role that oil and gas has played in advancing the interests of the people of the North Slope. I invite you and your team to begin a collaborative and meaningful discussion with the Borough and our residents about the future of oil and gas on the North Slope of Alaska. I believe that it can be a productive discussion.

North Slope Borough

The Borough is the regional government for eight villages spread across northern Alaska. The Borough's jurisdiction stretches from the United States-Canada border across to the western border of Alaska, and its coastline extends across the Beaufort and Chukchi Seas. It is the largest municipality in the United States by size. The Borough's jurisdiction includes the Iñupiat

¹ We understand that the Department is seeking public comments to inform its review of the federal oil and gas program as called for in Executive Order 14008, and that such information will help inform an interim report by the Department that "will include initial findings on the state of the federal conventional energy programs, as well as outline next steps and recommendations for the Department and Congress to improve stewardship of public lands and waters, create jobs, and build a just and equitable energy future." Such a report must include the voices of the people of Alaska's North Slope.

villages of Anaktuvuk Pass, Atkasuk, Kaktovik, Nuiqsut, Point Hope, Point Lay, Utqiagvik (formerly Barrow), and Wainwright, as well as the Prudhoe Bay oil field, most of the National Petroleum Reserve-Alaska, and much of the Arctic National Wildlife Refuge, including the coastal plain.

Approximately three-quarters of the Borough's nearly 10,000 permanent residents are Iñupiat. The Iñupiat and other indigenous peoples of the region have depended on the subsistence resources of the North Slope of Alaska's lands and waters for their physical health, cultural well-being, and survival for thousands of years. Over 98% of Iñupiat households utilize subsistence foods, and the social fabric of our communities revolves around subsistence. The importance of this subsistence way of life to our communities goes beyond the need for food. Our unique Iñupiat culture, our traditions, and our links to our ancestors and history are tied to our subsistence lifestyle, to our custom of sharing with others, and to celebrating our connection to the land and the ocean.

Oil and gas resources developed on the North Slope come from our backyard—a place that has sustained our people for generations. The Iñupiat have strong cultural and subsistence ties to the areas where oil and gas development on the North Slope occurs. We benefit from oil and gas development but also have considerable risks. Thus, any form of development on this land demands careful and balanced stewardship. We consider ourselves to be the first and rightful stewards of these lands.

Historical Significance of Federal Involvement in Oil and Gas Development on the North Slope

Over the last 150 years, the North Slope of Alaska—land inhabited by the Iñupiat people for thousands of years—has been parceled out to serve the interests of government, industry, and conservation. The United States purchased Russia's property interests in Alaska in 1867. In 1923, the United States set aside 23 million acres of the North Slope—an area the size of Maine—as the Naval Petroleum Reserve No. 4. Today, that area is called the National Petroleum Reserve-Alaska, or NPR-A, and pro-industry and pro-conservation groups are locked in a never-ending fight to advance their competing interests in this land.

In 1960, the Department set aside land in northeastern Alaska, which in 1980 became the 19 million-acre Arctic National Wildlife Refuge, or ANWR. ANWR covers an area roughly the size of South Carolina. Whatever this Administration may think about proposals to develop oil and gas resources in ANWR, that area has long been claimed by the United States and outside groups for conservation without the consent or even meaningful consultation of the Kaktovikmuit—the Native people who actually reside within ANWR, or other North Slope residents.

Alaska became a state in 1959, and the federal government granted the new state an entitlement to 102 million acres of land. In 1968, oil was discovered at Prudhoe Bay, and the state selected the land at Prudhoe Bay over the objections of the Iñupiat people who had inhabited those lands.

In 1971, Congress passed the Alaska Native Claims Settlement Act (ANCSA). This Act allowed Alaska Natives to select and acquire 44 million acres of land around the state but were also preventing from selecting land at Prudhoe Bay because of the State's previously selection. Also, the federal government had already set aside the NPR-A and ANWR, even though these places had for thousands of years been home to the Iñupiat people of the North Slope.

Because the federal and state governments had already claimed Iñupiat land and resources, the Borough's first mayor and the founder of the Inuit Circumpolar Council, Eben Hopson, worked with other Iñupiat leaders to create the North Slope Borough, a home-rule municipality that gave our people the ability to tax oil and gas infrastructure and thereby benefit from the resources being developed in our backyard.

Tax revenues collected by the Borough have for almost 50 years enabled the Borough to provide basic services, which are frequently taken for granted in most other communities in the United States, to the eight villages on the North Slope. Oil and gas tax revenues support health clinics, schools, our tribal college (the only tribal college in Alaska), water and sewer infrastructure, search-and-rescue services, and other essential services in all of our villages.

In a speech he gave in 1976, Eben Hopson talked about the discovery by the federal government of natural gas near Utqiagvik, formerly Barrow. The federal government had created the Naval Petroleum Reserve in 1923 and, within the Reserve, the Navy established a small research facility near Point Barrow. Exploratory drilling led to the discovery of natural gas in 1949, and a gas field was developed near the community. Natural gas was used to heat federal buildings like the hospital, the Bureau of Indian Affairs school, and the Naval Arctic Research Laboratory. But the Navy did not allow the community of Barrow to use the gas to heat their homes.

In his speech, Eben Hopson spoke about the "long, frustrating, 12-year struggle to get permission to hook our homes in Barrow to gas mains that crisscrossed Barrow through our back yards." Although it sounds incredible today, the Navy refused to let the residents of the Native village use the natural gas that came from our own backyard to heat our homes. It took an act of Congress in 1963 to allow the Native people of Barrow to buy their own natural gas back from the federal government.

The point of telling this history is obvious: the North Slope oil and gas resources literally come from our backyard. The development of those resources has had an overall profound, positive impact on our communities for 50 years. We don't have urban sprawl or malls or factories, and we don't want them. But we do want to ensure that our people continue to derive benefit from our land's natural resources to sustain our communities and enable our participation in a modern economy. Revenue from oil and gas development has been invested and will continue to be invested in the immediate and long-term survival of our communities. It is fundamental to our economic survival; it may not always be that way, but it certainly is true today.

Importance of Oil and Gas Development to the Borough and Its Residents

Responsible oil and gas development is essential to the economic survival of the Borough and its residents. Oil and gas activities are the primary economic generator for our region, and North Slope oil and gas development is by far the most significant source of funding for the Borough's community services and infrastructure. The Borough's primary source of revenue is taxes levied on oil and gas infrastructure, such as processing equipment, pipelines, and other facilities. For example, in 2016, the Borough received approximately \$373 million in oil and gas property taxes, accounting for 97% of the \$386 million in total property taxes collected by the Borough that year. In 2017, oil and gas property taxes accounted for 95% of the Borough's \$392 million in total property tax receipts.

As noted above, these tax revenues enable the Borough to invest in public infrastructure and utilities (including reliable sewer, water, and heat) and to provide essential services to our eight communities, including education (e.g., Alaska's only tribal college), health (e.g., clinics in each village, hospitals, schools, and increased sanitation), and emergency services (e.g., aircraft and crew that conduct regular medevac and search and rescue operations throughout the North Slope). These revenues support our Department of Wildlife Management, through which we deploy significant biological and traditional expertise to gather information on important subsistence species and on the land and water that is used to protect our residents' cultural and subsistence resources and to balance our cultural and nutritional needs with development of oil and gas resources. In addition to providing these services, the Borough creates employment opportunities for local residents; the local government sector (primarily, the Borough government) is the largest employer of North Slope residents.

In addition to tax revenue, the Borough and its residents benefit from the generation of royalty revenue sharing available to fund the NPR-A Impact Grant Program, which administers grants from federal revenues from oil and gas activities within the NPR-A, which are used to offset development impacts or improve communities impacted by development. Such grants are available to North Slope municipalities, including both the Borough itself and its incorporated cities. These grants are of significant benefit to the local communities.

For example, over the past ten years alone, the Borough has received almost \$30 million in NPR-A Impact Grants, which it used to fund dozens of projects related to safety, local government, infrastructure, wildlife and fisheries management, environmental health, workforce development, subsistence, planning, and social and cultural programs. A few highlights include:

- \$8,707,798 – Community Winter Access Trails: to design, construct, monitor, and maintain the North Slope Borough Community Winter Access Trails (e.g. packed snow trails) because there are no roads connecting most of our communities with the rest of the state or country. Our efforts include support for safe travel and an inspection program within the NPR-A villages, documentation of data needed to support lower cost connectivity for village residents to the state road system, and quantifying the potential benefits of establishing seasonal trails for all NPR-A communities.

- \$2,750,000 – Naval Arctic Research Laboratory Road: to relocate of a portion of Stevenson Road which provides access from the City of Utqiagvik to the Naval Arctic Research Laboratory area complexes, including Illisaġvik College and subsistence sites beyond.
- \$1,187,500 – Area-Wide Air Quality Study: to focus on several aspects of air quality and air quality monitoring by collecting baseline data in the NPR-A impacted communities.
- \$1,400,000 – NPR-A Village Comprehensive Land Use Plans: to create and update comprehensive plans that serve as a guide to the local governments when they are making decision on budgets, ordinances, capital improvements, zoning, and subdivision matters related to the community.
- \$1,174,100 – EMS Equipment Upgrades & Emergency Training Equipment: to support emergency medical services, fire protection, and search and rescue capabilities.
- \$682,000 – Iñupiat Language Revitalization: to revitalize, save, and sustain the Iñupiatun dialect by building greater awareness of the status of North Slope Iñupiatun, conduct community gatherings in the NPR-A villages, develop after-school language program, quarterly seminars supporting Iñupiatun fluency, and develop assessment tools to measure language learning and language loss.
- \$377,500 – Student Outreach/Science Education for NPR-A Villages: to enhance the critical education of students in the North Slope NPR-A villages regarding vital subsistence resources and scientific and traditional knowledge studies conducted by the NSB Department of Wildlife Management as a means of building much needed capacity in the NPR-A villages.
- \$300,000 – NSBPD Training & Personnel for NPR-A Impacted Communities: to provide police officers for the five NPR-A villages.
- \$300,000 – Health Impact Assessment – Mental Health: to provide baseline data for future mental health impact-related studies of residents across the North Slope Borough that are within the NPR-A communities.
- \$250,000 – Monitoring Teshekpuk Caribou Movements with Satellite Telemetry: to monitor the movement and seasonal distribution of the Teshekpuk caribou.

The benefits to the Borough and our residents from oil and gas development goes beyond direct financial support from tax revenue and Impact Grants. The Borough coordinates with local, state, tribal, and federal entities to inform decision-making regarding new oil and gas development, efforts to mitigate the impacts of development on Borough residents and resources, and efforts to ensure that development provides ancillary benefits in the form of infrastructure and other benefits for our residents.

Additionally, infrastructure investments associated with oil and gas development sometimes involve new roads and local facilities that provide tangible benefits to our residents. On the North Slope, access to subsistence areas and connectivity provided by roads is viewed by many residents as a significant benefit. For example, roads associated with industrial

development near the Borough villages of Utqiagvik and Nuiqsut have improved the ability of our residents to pursue subsistence opportunities.

Exploration and development activities increase employment opportunities for the residents of Borough villages. Currently, economic opportunities in our communities are limited due to their isolated locations. Development on the North Slope brings jobs to the Borough's communities, including for Borough residents. More than one-third of jobs held by Borough residents are directly or indirectly supported by the oil and gas industry.

Finally, oil and gas development and exploration serve as economic multipliers on the North Slope. Oil and gas activities increase household income for local residents employed by industry or for whom employment is supported by tax revenues. In addition, industry often contracts with Alaska Native corporations, and local shareholders of these Native corporations benefit from employment opportunities, dividend income, and the myriad investments of the Native corporations in the social, cultural, and economic welfare of the communities.²

Impact of Executive Order 14008 on the Borough

There is no question that federal, tribal, state, and local governments all play a role in protecting public health. There is no question that curbing the impacts of climate change is an important piece of the federal government's public health responsibilities. However, actions that unreasonably prohibit, restrict, or delay oil and gas development on the North Slope will have a significant negative impact on the Borough's economy and our ability to generate tax revenue to provide critical services, including health and educational services, to our residents.

The potential loss of tax revenue and NPR-A Impact Grants would directly and significantly impair the Borough's ability to provide essential government functions, support and grow our economy, provide increased opportunities for our citizens, and provide for the health and well-being of our residents. Further, loss of economic activity on the North Slope means lost jobs and opportunities for our residents in an area of the country that already struggles with significant unemployment.

The Borough relies on the construction of new oil and gas infrastructure to support the continued generation of critical tax revenues for the Borough. As existing oil and gas production declines in the legacy Prudhoe Bay fields, new sources of revenue generated by new projects, such as ConocoPhillips' Willow Project, will allow the Borough to maintain essential municipal services, including health and educational services, for our residents and communities.

The Borough participated as a cooperating agency with the federal government in the development of the Environmental Impact Statement for the Willow Master Development Plan.

² For example, ConocoPhillips is utilizing local Alaska Native corporations to perform work related to the Willow Project in the NPR-A. Local corporation Nanuq Inc. (a wholly owned subsidiary of Kuukpik Corporation, Nuiqsut's local village corporation established pursuant to ANCSA), employs Nuiqsut residents and serves as the Willow Project's ice road construction contractor. In addition, staking and survey work for the ice road is performed by UMIAQ Design, LLC (a subsidiary of Ukpeagvik Ifupiat Corporation, Utqiagvik's local ANCSA village corporation).

Through numerous meetings and workshops, we assisted in the development of the alternatives, required operating procedures, and best management practices for mitigating impacts to renewable resources for the Willow Project. The Bureau of Land Management did an exceptional job throughout this process in its outreach to local entities. Furthermore, the Willow Project is a great example of responsible oil and gas development. It is land based development typical of the North Slope, which will be connected to existing infrastructure and the Trans-Alaska Pipeline System. For all the reasons noted above, The Willow Project will benefit the Borough and support our ability to maintain essential municipal services to our residents and communities. For these reasons, we have intervened in the legal challenges to the Willow Project from outside groups that do not understand or appreciate the mitigation measures and planning that went into this project, as well as its importance to North Slope's residents. We look forward to working with the Department of the Interior in this litigation.

Conclusion

The Borough welcomes the opportunity to submit comments to the Department on its Public Forum on the Federal Oil and Gas Program. We encourage the Department to regularly and meaningfully engage with the Borough as it moves forward in its evaluation of the federal oil and gas program and other activities and decisions that impact our communities and subsistence resources. The Department could benefit from the unique perspective of the Borough and our residents about our lands, waters and other resources.

Nearly three-quarters of Borough residents are Iñupiat. The Iñupiat have strong cultural and subsistence ties to these lands and have a vast knowledge about the area because we have depended on the subsistence resources of the North Slope's lands and waters for our physical health, cultural well-being and survival for thousands of years. We rely on responsible and balanced resource development in order to support economic and infrastructure development opportunities, and access to services and the provision of employment and subsistence benefits for our residents. The Department must consider the real-world impacts of its decisions and hear from the people who will be directly implicated by those decisions as it considers its responsibilities under Executive Order 14008. We call on the Department to actively engage with the people of the North Slope as it considers changes to programs and policies that effect the everyday lives of our residents.

Sincerely,



Harry K. Brower, Jr.

Mayor, North Slope Borough

August 1, 2022

Stephanie Rice
Natural Resources Specialist
BLM Alaska State Office
Phone:907-271-3202
srice@blm.gov

Subject: Willow Master Development Project Draft Supplemental EIS Comment Period

Dear Ms. Rice,

I am writing to you today as an Iñupiat, resident of the North Slope, the North Slope Borough(NSB) Assemblyman and President to the Assembly during the NSB Planning Commission hearing on the Re-Zone for the Willow Development Project in the National Petroleum Reserve-Alaska (NPR-A). I am urging the Bureau of Land Management (BLM) **to not extend the public comment period beyond 45-days** for the Willow Master Development Project (Willow MDP) Supplemental EIS as so many environmental organizations are requesting. In reviewing the Supplemental EIS (SEIS) I have found that the BLM has done an excellent job in identifying NEW and UPDATED information in the SEIS to address the three items that were remanded to the BLM though the U.S. District Court of Alaska. The BLM has also presented a new alternative, Alternative E, that encompasses the new and updated information presented to the agency since the prior EIS, most of the new data responds to the items in the remand but other items reflect local municipal decisions that were made by the North Slope Borough after the FINAL Willow MDP EIS was published.

Based on my experience as an Assemblyman and resident of the North Slope of Alaska, I can say that the Willow MDP has gone through an extraordinary amount of public process starting with the 1998 NPR-A Integrated Activity Plan-EIS and following 1999 Lease Sale and continuing through to the 2013 NPR-A Integrated Activity Plan – EIS (NPR-A IAP-EIS) approved under Secretary of the Interior Salazar through to the recent 2022 decision by Secretary of Interior Haaland to approve the ‘No Action Alternative in the 2022 NPR-A IAP-EIS thereby restoring the outcomes of the 2013 NPR-A IAP-EIS. It is important to recognize that there are many people from the North Slope either as individuals, members of the communities, or elected officials who have worked hard with BLM to ensure that the North Slope is heard – therefore engagement since the 1998 NPR-A IAP-EIS is important to understand. Ms. Rice, you have been around our people long enough to recognize that we are a story-telling culture and as such we have long and fast memories. We have built protections into the various NPR-A Integrated Activity Plans to ensure our lands, subsistence, and culture are respected and represented in the documents – to us these are living documents that have grown more comprehensive overtime. We, residents of the North Slope of Alaska, remain committed to our involvement because these are our homelands – these are the lands that we depend on for our sustenance through subsistence. We have also found that development can be a benefit to our subsistence activities by providing us access for subsistence. As the BLM states in prior decisions these are countervailing impacts that benefit us.

Many of us who engaged in the 2013 NPR-A IAP-EIS are aware that the 2013 Record of Decision was one of many compromises between our people and communities, outside environmental groups, and

industry. We applauded Secretary Salazar and our own NSB mayor, Mayor Itta, at the time because it represented a balanced approach towards leasing and adding many new stipulations and required operating procedures into oil and gas leases sold. The NSB played an enormous role in these negotiations and compromises. Since 1998, our region has been engaged in almost non-stop public engagement on NPR-A projects and plans and the area now called Willow has always been part of the analysis and process.

The BLM process is only one of the processes our people, local governments, and entities engage in. Through the North Slope Borough's Planning Department and Planning Commission, we have our own processes to evaluate projects, accept public input, and apply our own mitigations on both exploration and development projects within our region.

Fifty years ago this year, the North Slope Borough was formed and is currently the largest municipal government in the United States. Through the foresight of our past elders, we have been able to achieve many things but foremost of our accomplishments is the NSB's ability to move our communities from third-world to first-world conditions in just 50 years. Is everything perfect? Not necessarily, but through these changes our communities we have been able to increase the average lifespan of our Iñupiat people by over 13 years. We do this through the revenue generated from property taxes. Over 95% of our tax revenue is generated through oil and gas infrastructure. I understand climate is changing, we see it every day, we are at the forefront of climate change with a warming arctic, but our world has not yet weaned itself from fossil fuels and therefore the Willow Project is critical for our community's future. It allows us time to focus on diversifying our local economy for long-term sustainability.

Our collective engagement on the project was first through its exploration program and plans and subsequently in the Willow MDP after ConocoPhillips Alaska Inc (CPAI) submitted to your agency an application for development. The NSB Planning Department has a permitting role in the project and through them and the operator, CPAI our Assembly received regular updates on the project over time. These updates are meant to be informative as well as to allow our Assembly members to ask questions and raise concerns and issues we hear from our community residents. Our borough was formed to provide local government over our region, and I feel that decisions about development in our region should weigh the positives that it allows our people through providing a better quality of life, such as, clean water and sanitation, local healthcare, emergency services, low cost housing, and much more – these are things that the NSB provides to our communities, this doesn't come from the federal or state government. For people to object to our economy and ability to provide for our residents is offensive to me. We are asking that 0.1637% of the 23 million acres within the NPR-A be allowed for development to provide for these services for our next generations.

Under North Slope Borough Municipal Code § 19.60.060 the NSB has the authority to rezone areas of the North Slope under Alaska Statutes AS 29.40.010 and 29.040(a). As a result, anytime a development occurs in an area not designated as resource development the NSB Planning Department engages in an exhaustive re-zone analysis to ensure that the lands meet the objectives and goals of the NSB Comprehensive Plan; that growth and development of the Borough is in accordance with the values of its residents; to identify and secure beneficial impacts of development; to identify and avoid, mitigate or prohibit negative impacts of development; and to ensure all future development is of the proper type, design and location and is served by a proper range of public services and facilities. This requires both public community meetings and meetings and outside engagement of consultancy to achieve and

outcome that provides a robust analysis of the proposed project for the development for revision of the NSB's Master Plan for rezoning. As an Assemblyman for over 14 years, I have a fiduciary responsibility to understand and work with our administration to implement to the NSBMC to be the best of our collective abilities.

I state this because the Willow MDP is a project that required a rezone of the area under the NSB rezone process. Under § 19.30.010 the Assembly shall review and act upon all applications for rezoning and amendments to this title. The Assembly's decision shall be final with respect to any rezone within the NSB boundaries. In May 2020 the NSB Planning Department held a pre-application meeting with CPAI to initiate the re-zone process of 37,654 acres of land to Resource Develop District. The process of the NSB Planning Department is to develop a Master Plan for the project to ensure that the project meets the objectives and policies of the NSBMC § 19.70.050 – Coastal Management and Area-wide Policies to protect subsistence, cultural, compliance with state and federal regulations, and to minimize negative impacts to our region. This process included a public comment period and meetings with key stakeholders in Nuiqsut to get input.

Following the work of the Planning Department and through the separate meetings of the Planning Commission, on January 5, 2021, the Assembly hearing started and continued into January 6th and 7th. As President of the Assembly, it was critically important that the Assembly listen to all stakeholders within the North Slope, and I therefore lifted our normal three-minute limit for public comments, as provided for under §2.04.080 (B)(2), feeling this imposed undo time constraints on our public speakers on a project of this nature. After three days of very extensive testimony on certain issues with the rezone from the community of Nuiqsut, the Assembly directed the Planning Department to meet with constituents from Nuiqsut and CPAI to address ways to mitigate the concerns from the community. On January 15th, the parties presented changes to the project to the Assembly. After a multi-day thorough vetting of interested parties, the Assembly received revised Ordinance 75-06-75 with changes to the Master Plan and additional stipulations. The revised negotiated Ordinance and Master Plan was approved through a majority vote by the Assembly.

It is important for BLM to take all the North Slope Borough's involvement and efforts into account when evaluating whether to extend the public comment period for the Willow MDP SES. All our involvement, public participation, working with the BLM as a Cooperating Agency on both the Willow MDP EIS and Willow MDP SEIS should be meaningful to the process. Our local input should carry weight over the influence of outside parties from both the environmental organization but also from the U.S. Congress. We are elected officials of our municipal government and as such we are required to address issues within our region and on our ancestral lands – we are the ones who know what works and doesn't work within our boundaries. When the North Slope Borough, the Iñupiat Community of the Arctic Slope, the Native Village of Nuiqsut, and the City of Nuiqsut are on the cover of the Draft Willow MDP SEIS that says our region was engaged and involved in working with the BLM to address the issues directed by Judge Gleason in her Remand which caused the Supplemental EIS to be conducted.

Through our review of the Willow MDP SEIS and the new Alternative E, many of the items in the Alternative E, are aligned with NSB Ordinance 75-06-75 and accompanying Master Plan. As an example, the new Alternative E and our Master Plan are aligned in the removal of BT4 drill site and delaying approval of the BT5 drill site. These were issues that we heard about from Nuiqsut and through this alternative it appears that BLM has mitigated those concerns.

I want to reiterate to you that due to the above and the comprehensive nature of our involvement through our own municipal code and as a cooperating agency ***there is no need to increase the public comment period beyond the current 45-day period for the Draft Willow MDP and there is certainly no need to schedule meetings in Washington DC over our region.*** The Biden Administration has made several statements about increase and strengthening its bonds with indigenous peoples and to ignore our participation and involvement in NPR-A decisions over the last 24 years runs counter to this .

Sincerely,



John Hopson, Jr.

North Slope Resident, NSB Assembly Member, and Past Assembly President

CC: Steven Cohn, Alaska State Director – BLM
Tracy Stone-Manning, Director-BLM
Secretary Deb Haaland – Department of the Interior
Deputy Secretary Tommy Beaudreau – Department of the Interior
Raina Thiele - Senior Advisor for Alaska Affairs and Strategic Priorities
Senator Lisa Murkowski
Senator Dan Sullivan



July 21, 2022

The Honorable Deb Haaland
Secretary, U.S. Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Secretary Haaland:

We write to strongly oppose requests for the Bureau of Land Management (BLM) to extend the comment period for the Draft Supplemental Environmental Impact Statement (SEIS) for the proposed Willow Master Development Plan (Willow). The requested extension would provide no additional benefit in terms of informed environmental review for the project and would serve no purpose other than attempting to delay the project beyond the point of economic feasibility to the detriment of the Alaska Native people who call this region home.

Our region has a multitude of Alaska Native entities that work together to effectively serve, provide for and enrich the lives of the Iñupiat people we represent. Our three entities, the Iñupiat Community of the Arctic Slope (ICAS), the North Slope Borough (Borough) and Arctic Slope Regional Corporation (ASRC) are three of those entities. While our roles are defined, our constituencies overlap which is why we work closely together to protect the cultural and economic interests of the North Slope Iñupiat.

Established in 1971, the Iñupiat Community of the Arctic Slope is a federally recognized regional tribal government for the North Slope and represents over 13,000 Iñupiat tribal members. The mission of ICAS is to exercise its sovereign rights and powers for the benefit of tribal members, to conserve and retain tribal lands and resources including subsistence and environmental issues, to establish and carry out justice systems including social services under Iñupiat tribal law and custom, and to increase the variety and quality of services provided to current tribal members and for our future generations.

The North Slope Borough is a home rule government located above the Arctic Circle that represents the roughly 10,000 residents in the eight communities of the region. The Borough's jurisdiction includes the entire National Petroleum Reserve – Alaska (NPR-A) and the villages within it—Nuiqsut, Atkasuk, Utqiagvik, and Wainwright. In 1972, the Iñupiat people of the North Slope formed the Borough to ensure our communities would benefit from oil and gas development on their ancestral homelands. It was the first time Native Americans took control of their destiny through the use of a municipal government. The Borough exercises its powers of taxation, property assessment, education, and planning and zoning services. Taxes levied on oil and gas infrastructure have enabled

the Borough to invest in public infrastructure and utilities, support education, and provide police, fire, emergency and other services. Elsewhere in rural Alaska, these services are typically provided by the state or federal governments.

Arctic Slope Regional Corporation was incorporated pursuant to the passage of ANCSA. ASRC is owned by and represents the business interests of our approximately 13,600 Iñupiat shareholders, many of whom reside in the eight communities on the North Slope. ANCSA extinguished aboriginal land title and conveyed nearly five million acres of fee-simple land to ASRC for the cultural and economic benefit of our Iñupiat shareholders. Mandated by Congress to not only operate as a for-profit corporation but to serve the social and welfare interests of the people it represents, ASRC is committed to providing financial returns to our Iñupiat shareholders in the form of jobs and dividends, and to preserving Iñupiat culture and traditions.

Contrary to the blatant mischaracterizations in the extension requests and the false narratives promoted by outside groups, the Willow project has been subject to numerous environmental reviews and public comment periods under NEPA and other environmental statutes. Willow is not a new project requiring public review of voluminous newly available documentation. This is the **fifth** public comment period for the Willow EIS. By our calculation, by the end of the current comment period, BLM will have provided 215 days of public comment and hosted 25 public meetings on the Willow EIS.

Further, the scope of this latest review was limited to a discrete set of issues that Judge Gleason identified in her August 2021 opinion. BLM has helpfully provided clear notations in the updated draft SEIS, making for an easy review of newly added information and analysis. To suggest that public review requires additional time beyond the present 45-day comment period belies the true motives of those seeking the extension—to delay the project beyond economic feasibility and to let Willow “die a death by a thousand cuts.”¹

The Interior Department’s plan for Willow was developed through a years-long, rigorous environmental review process with significant involvement by and support from local communities and Alaska Native entities, particularly the North Slope Borough, the regional municipal government for our region, which served as a cooperating agency in the development of the EIS for Willow. Furthermore, given its location within the National Petroleum Reserve-Alaska (NPR-A), the Willow project area has been subject to additional environmental review associated with the planning and development of the NPR-A Integrated Activity Plan. Willow is a well-planned, highly vetted, environmentally responsible project.

The groups requesting additional time have had ample opportunity to review the project and are well-acquainted with the environmental review documents. They have provided input at every stage of the public comment process. Some have litigated the EIS in federal court. Their purported need for additional time to review this limited SEIS is belied

¹ Joshua Partlow, Washington Post, “A ‘carbon bomb’ or desperately needed energy? Alaskan village holds key to Biden’s climate policy,” (June 26, 2022) (quoting Trustees for Alaska attorney Bridget Psarianos, “My hope is that Willow dies a death by a thousand cuts.”).

by their actions and their familiarity with the project and its environmental documents. BLM's provision of 45-days to review the information in the draft SEIS—which is the standard comment period length for an EIS—is more than sufficient.

These extension requests serve political interests, not those of the people of the North Slope of Alaska. It is not lost on us that the requested—but unnecessary—extension would put the comment deadline in mid-November, conspicuously close to politically significant mid-term election dates. Those seeking such extensions are not looking out for the interests of the people who will be harmed by any further delay of Willow's review.

Though the requested extension may not seem significant, every project delay also delays the project's economic, infrastructure, and employment benefits to North Slope communities and our people. Responsible oil and gas development is essential to our economic survival. It is the primary economic generator for our region, and taxes levied on oil and gas infrastructure are by far the most significant source of funding for our local government's community service and infrastructure. All actions that unreasonably prohibit, restrict, or delay oil and gas development in our region significantly impact our ability to provide critical services to our people. And loss of economic activity on the North Slope means lost jobs and lost opportunities for our people in a region where economic opportunity is generally low, and the cost of living is extremely high.

ConocoPhillips is prepared to start construction by the 2022-2023 winter season to bring this project to fruition and to start bringing the benefits of this development to the people of the North Slope as early as this year. A delay is unnecessary, harmful and contrary to the interests of the Alaska Native people who call the North Slope home.

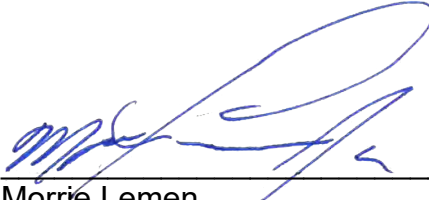
The current development plan for Willow incorporates local knowledge and input, and it was specifically designed to protect surface values and to protect the Iñupiat way of life, including subsistence. As we have expressed repeatedly in comments submitted to the Department, we are satisfied that the mitigation measures adopted by the Department will protect the land, water, and wildlife resources of the North Slope, as well as our communities' health and wellbeing. We are united in our continuing support for the Willow project. And if this Administration is truly committed to Alaska Native self-determination and the meaningful involvement of our people in federal decisions tied to our ancestral lands, it must listen to the elected regional Alaska Native leadership who speak in unified support for Willow, not to outside interests.

We urge you to deny the requests for this wholly unnecessary extension. BLM should proceed with allowing review and comment on the draft SEIS as scheduled so this project that is of great significance to the people of the North Slope can move forward without further undue delay.

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Sincerely,

IÑUPIAT COMMUNITY OF THE ARCTIC SLOPE




Morrie Lemen
Executive Director

NORTH SLOPE BOROUGH



Harry K. Brower, Jr.
Mayor

ARCTIC SLOPE REGIONAL CORPORATION



Rex A. Rock, Sr.
President and CEO
Arctic Slope Regional Corporation

cc: U.S. Senator Lisa Murkowski, Alaska
U.S. Senator Dan Sullivan, Alaska
Tracy Stone-Manning, Director of Bureau of Land Management
Bryan Newland, Assistant Secretary of the Interior for Indian Affairs
Tommy Beaudreau, U.S. Deputy Secretary of the Interior
Nada Culver, Deputy Director for Policy and Programs
Steve Cohn, Alaska Director
Stephanie Rice, Project Lead
Raina Thiele, Senior Advisor for Alaska Affairs and Strategic Priorities
PaaWee Rivera, Senior Advisor and Director of Tribal Affairs



February 23, 2022

Sent Via Electronic Mail

The Honorable Debra Haaland
Department of the Interior
1849 C Street, NW
Washington, DC 20240
raina_thiele@ios.doi.gov

Re: AFN Continued Support for the Willow Project

Dear Secretary Haaland:

On behalf of the Co-Chairs and Board of Directors of the Alaska Federation of Natives (AFN), I write to share our long-standing support for the Alaska Willow Project in the National Petroleum Reserve Alaska (NPR-A).

The Willow project has undergone stringent environmental permitting and a vigorous community engagement process. It was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over two years and included multiple rounds of public comment and public meetings with Alaska Native stakeholders. AFN appreciates the outreach and communication between ConocoPhillips and the Alaska Native community and considers the process a model for other development initiatives.

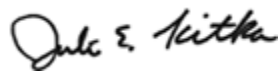
AFN understands that the need for a proactive whole of government approach to deal with climate change; however fossil fuels will be with us for quite some time to come, and projects like Willow can help bridge the gap. As such, delaying Willow any further will only hinder Alaska's economic recovery. The Willow Project could jumpstart our economy with thousands of jobs and be a model in community and environmental stewardship for future opportunities.

Additionally, the international crisis in Ukraine highlights the Willow project's importance to our national security. The looming invasion of Ukraine by Russia is already stressing global energy markets. The Willow Project is a critical opportunity for the U.S. to expand domestic energy supplies and security while creating economic opportunities to help Alaska recover from the pandemic. As such, I strongly urge you to support the current

record of decision and allow the Willow project to move forward as planned and previously approved.

Thank you for your consideration. If you have questions, please feel free to contact me directly at (907) 274-3611.

Sincerely,

A handwritten signature in black ink that reads "Julie E. Kitka". The signature is written in a cursive, flowing style.

Julie Kitka
President

Cc: U.S. Congressman Don Young
U.S. Senator Lisa Murkowski
U.S. Senator Dan Sullivan



February 4, 2021

The Honorable Deb Haaland
Secretary Nominee
Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Dear Secretary Nominee Haaland,

The ANCSA Regional Association (ARA) represents the twelve Regional Corporations created under the Alaska Native Claims Settlement Act (ANCSA) which was approved by Congress and signed into law by President Nixon in 1971. The Alaska Native Village Corporation Association (ANVCA) represents 177 village and urban corporations created by ANCSA. Together these organizations represent over 150,000 Alaska Native shareholders.

We write today to urge the Department of Interior not to delay the ConocoPhillips Alaska Willow Project given the exhaustive and thorough review process it has already undergone, and the urgent need for vetted, economic opportunities for safe development in Alaska.

ARA and ANVCA strongly support responsible resource development in Alaska and are concerned about reports that the DOI intends to, once again, review the EIS Record of Decision (ROD) for Willow, which could delay or defer the project's progress.

There is no basis for further review of the ROD, given the extensive record of public hearings, documented BLM efforts to address all issues raised through public comment, completion of an in-depth environmental analysis, and the over 270 stipulations and best management practices the project will be required to follow. The Willow EIS was performed under the rigorous process in place during the Obama Administration, and was not expedited or granted any special consideration. The EIS took more than two years to complete and the report itself totals more than 2,600 pages of in-depth analysis. Given the extensive nature of the process used to perform the Willow EIS, we request that the Department of Interior not delay the Willow project for further unnecessary analysis, or political rhetoric.

The State of Alaska has been in recession for over five years, well before the COVID pandemic hit, which then caused further negative impacts in every industry important to our state. The federal government should be looking at opportunities to help Alaska respond to these impacts rather than exacerbating them. Delaying a project like Willow, which has already passed a rigorous EIS process, will cause ripple effects throughout the Alaskan economy. This project will support over 2,000 construction jobs and hundreds of long-term jobs, while providing over \$2 billion in revenues to the State of Alaska and \$7.6

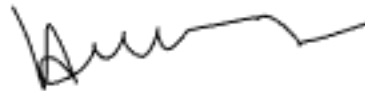
billion in federal royalties. For context, \$2 billion is roughly the size of the current budget deficit faced by our state. Revenues received by this project allows our rural communities to receive continued support to schools, health clinics and basic public services like water and sewer treatments.

The Willow Project has passed every environmental and community test put before it and would provide a much-needed economic boost to Alaska. Delaying it any further will only bring more harm to our state. It also harms the economy and budget of the North Slope Borough, the local government most closely impacted by the federal government's decision for review.

Best Regards,



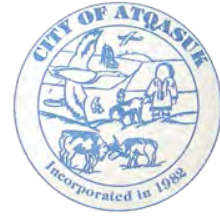
Kim Reitmeier, Executive Director
ARA



Hallie Bissett, Executive Director
ANVCA



City of Wainwright



April 26, 2021

The Honorable Secretary Deb Haaland
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240
debra_haaland@ios.doi.gov

Dear Secretary Haaland,

We are writing you today, collectively, as three city municipal Mayors from the North Slope of Alaska representing the communities of Utqiagvik, Wainwright, and Atkasuk - all three located within the boundaries of the National Petroleum Reserve - Alaska or NPR-A. First, as indigenous Alaskan Native Iñupiat communities of the region, we would like to congratulate you on your confirmation as the first indigenous woman to be selected for your position - we are truly honored and hopeful that through your position as Secretary of the Department of the Interior (DOI) will have a positive and profound impact on the Iñupiat, and all residents, within our region. Your department plays a significant role in Alaska and we trust that we can develop a good relationship with the DOI as we move forward during your tenure as Secretary.

Our region, the North Slope of Alaska, covers approximately 90,000 square miles above the Arctic Circle and is larger than 39 other states. It stretches from Point Hope on the Chukchi Sea in the west to the Canadian Border on the east and encompasses lands north of the continental divide in the Brooks Range. These are our lands and region and are home to eight Iñupiaq communities. To provide context, our coastline from Point Hope to Canada, spans a similar distance as the distance from Savannah, Georgia to Philadelphia, Pennsylvania - yet we have a single highway within our region. Conversely, if our coastline were overlain on the west coast, it would cover the distance between Mexico to Oregon. We provide these examples to show you the scale of our region and impress upon you that we do not have intra-region transportation infrastructure like roads and rail taken for granted elsewhere in our country. It has been home to us for more than ten thousand years and our continued inhabitation of the lands within the North Slope has been critical to our culture

and survival as indigenous people. The North Slope is also home to the largest municipal government in the United States, the North Slope Borough (NSB), whose municipal powers cover a region greater than the size of Minnesota.

As Mayors we represent the Cities of Utqiagvik, a first-class city incorporated in 1959; Wainwright – a second-class city incorporated in 1962; and Atkasuk, a second-class city incorporated in 1982; all located within the NSB boundaries and hold our powers through the State of Alaska as First-Class and Second-Class Cities under the Home Rule Powers of the NSB.

The NPR-A is our backyard; it provides us with our subsistence resources and our economic sustainability. The eight communities across the North Slope are dependent on the infrastructure the NSB provides for life, health, and safety. The costs of this infrastructure are high and the source of the NSB's ability to provide for our basic needs comes from its taxing authority on oil industry on the North Slope. Since the development of oil in our region we have seen the life expectancy of our people increase by 13 years, on average. This increase in our life span has come through first-world amenities like clean water, sanitation, health clinics, and other essential services. We cannot turn back the clock despite what outside groups would like to see.

We agree that our climate is changing; we are at the forefront of some of these changes and see them daily. Our culture is not one of being victims to circumstances – we are adaptable – and we are realists. We understand that the world is changing, and we want to see changes occur with respect to how we address the changes BUT we believe local indigenous leaders and traditional knowledge needs to make and inform the decisions so as not become victims to sweeping policy changes that will have major impacts on our survivability. The policies through various Executive Orders and Secretarial Orders coming from the Biden Administration can have a greater impact on our communities than changes to our environment will have in the long-term by significantly reducing our local economy, without allowing time or resources to integrate new technologies and diversify.

Our region supports oil development. It was not always this way, and in fact, we fought against development after its initial discovery at Prudhoe Bay. The discovery of hydrocarbons at Prudhoe Bay was the main driver that led to the passage of the 1971 Alaska Native Claims Settlement Act (ANCSA). While ANCSA is a true improvement on the Indian Relocation and Reservation programs utilized elsewhere in America, our forefathers fought against it; the North Slope region was the only region in the State that rejected ANCSA because it took too much and gave too little. Yet after ANCSA was passed, our early leaders, successfully fought for the right to have a significant role and voice in oil and gas development on their traditional land and “have worked hard to balance the health of the environment and culture with the survival of our people and communities.” (Quote from

Mayor Brower from Voice press release on EO.) In 1972, the NSB was formed, as a home-rule government to have the ability to exercise planning and zoning, to implement property tax, and to administer schools for its eight communities. In 2020, the cost to the NSB to maintain infrastructure, schools, manage wildlife, and administer its school system cost approximately \$400 MM. The money to pay for these services – in fact, over 95% of the borough funding - comes to the NSB in the form of property tax on oil and gas infrastructure within the borough. This same revenue stream that has modernized the North Slope is passed along and provides benefits to other regions and communities in turn through the revenue-sharing framework set up in ANCSA.

To have policies that would interfere with that revenue source without offering to use alternative sources of economic sustainability would be a sham and a taking - and completely at odds with the Biden Administrations alleged dedication to consultation and equality. We have been 'playing' by the federal rulebook since the discovery of oil on the North Slope. In fact, through the NSB Planning and Wildlife Management Departments, we use our traditional knowledge to identify changes in the environment for federal agencies to incorporate into their decision documents. We understand the National Environmental Protection Act (NEPA) and are experts in the process through our borough, tribes, ANCSA Corporations and through the public process. We are sophisticated and we actively participate in many forms throughout NEPA process.

Our City Councils have felt the need, due to the negative impacts, ambiguity, and contradictions in the various President Biden Executive Orders (EO), to pass individual resolutions supporting NPR-A leasing and developments and more particularly projects like the Willow Development (see attached resolutions). These resolutions were passed unanimously and reflect the concerns of our residents regarding our long-term economic sustainability as a region. We have watched EO's, and Secretarial Orders (SO) get issued that have a significant impact on our region. These EO's and SO's significantly undermine our participation in the processes, and we are appalled that your agency, Madam Secretary, is focused more on the environment than on our people. This has long been our experience with the environmental non-governmental organizations (eNGO's) who have worked hard to erase us from our own homeland.

In fact, your recently issued SO-3352, could cancel our contributions as a region to the 2020 NPR-A Integrated Activity Plan-Environmental Impact Statement (IAP-EIS). This would be a breach of our long-standing relationship with the Bureau of Land Management (BLM) who we have worked with through multiple IAP-EIS's since the 1999 NPR-A IAP-EIS, over the course of several administrations and have developed a trust in their ability to listen to us as significant stakeholders in the region. While you and your department are raising questions about the process and science of the BLM, we can tell you, having participated in

NEPA with the BLM for over 20 years, we did not see any changes, short-cuts, or poor science performed by the BLM in the 2020 NPR-A IAP-EIS and to imply there was undercuts our experience and undercuts your agency. The only thing from our perspective that has changes over time is the number of embedded policy personnel in the DOI that have fought us, as indigenous people, for many years. Executive Order 13175, recently refreshed by President Biden, requires consultation with Indigenous People, the City of Wainwright has >97% Alaskan Native Iñupiat population, the City of Atkasuk has > 92% Alaskan Native Iñupiat, and the City of Utqiagvik has >52% Alaskan Native Iñupiat and the NSB represents >78% of the Alaskan Native Iñupiat across the region.

We are very familiar with DOI consultation processes for both tribal and ANCSA entities because we participate in both. The DOI established its ANCSA consultation policy in August 2012 under Secretary Salazar to recognize the differences between tribes and ANCSA corporations in Alaska where we have a different relationship with the land. ANCSA severed our tribal relationship with the land and Congress developed a mechanism to provide lands to the newly formed ANCSA corporations for economic development purposes as payment for the lands. Over time this created friction between the tribes and the corporations because the federal government's trust responsibilities to tribes no longer extended to the ANCSA corporations. To be clear, tribal members are also shareholders of the ANCSA corporations and both are residents of our cities. Secretary Salazar recognized that, in Alaska, consultation was occurring with the tribes but the tribal entities themselves did not own the land and that decisions were being made on ANCSA lands without their input. We recognize that there are significant differences between tribal consultation and ANCSA consultation policies which is why we used both on the North Slope to assure ourselves that we are being heard throughout the NEPA process and are not being drowned out by the eNGO's – we are diligent in ensuring our concerns are acknowledged and addressed. Both consultation policies require that consultation begins early and is meaningful, that ANCSA consultation will help to ensure that future Federal action is achievable, comprehensive, long-lasting, and reflective of ANCSA Corporation input. This means that consultation must be a deliberative process by the agency. While we are delighted that President Biden re-emphasized EO 13175 we have not felt that the agency, BLM, has neglected its duty for continued and meaningful consultation, in fact, we feel just the opposite.

While we represent all the residents of our region, it is important to point out that a large percentage of our residents are Native Alaskan Iñupiat and therefore are also tribal members and are shareholders of ANCSA Corporations. It was a request by the NSB that caused the BLM to initiate the 2020 NPR-A IAP-EIS to address community transportation corridors and other corridors across the NPR-A. The NSB also participated as a Cooperating

Agency to review the science and ensure that the needs of the Iñupiat were being addressed through mitigation measures.

Under the 2013, NPR-A IAP-EIS based on evidence presented by North Slope leaders, Secretary Salazar directed the formation of the NPR-A Working Group (NPR-A WG). The formation of the NPR-A WG necessitated by the fact that the local voice, the indigenous voice, was being drowned out by the eNGO's in our region. The NPR-A WG is comprised of elected leaders on the North Slope, including the NSB, tribes, cities and ANCSA corporations, and its purpose is to act as an advisory body to the BLM. The objective of the NPR-A WG is to provide a forum for meaningful and regular input regarding the implementation of oil and gas leasing, land use conflicts, scientific studies, special area boundaries, and infrastructure projects supporting onshore and offshore oil and gas development such as production facilities and pipelines. We were elated to have a special private forum to engage with the agency, and we, as a region, were able to establish a strong relationship with BLM through this forum.

As city mayors, we are members of the NPR-A Working Group and Mayor Hopson of the City of Wainwright acts as Co-Chair of the forum. Recently we have realized the frustrating reality once again, have challenged the BLM and outside organizations began participating in the NPR-A WG meetings claiming it falls under the Federal Advisory Committee Act (FACA), which was not the original purpose or structure of the NPR-A WG. We need this closed forum to exist to allow our voices to be heard and considered and to speak openly and directly to the BLM not to be drowned out by the outside influences and eNGO's who feel like they know better how to manage the lands and waters we depend on than we do as the original indigenous peoples of the region.

Through our multiple entities and facilities, we actively participate in the NEPA process, sometimes at significant expense through time, resources, travel, and consultants. It is not easy for us to participate in evening public meetings – for free - after working a full day, yet participate we do, confident in the knowledge that we are the experts of our lands and resources. The reason that we are expending so much effort to describe our participation in consultation, public hearings, and meetings with the BLM is that they listen to our concerns and work through alternatives, stipulations, and mitigation measures that are meaningful – so when a Record of Decision is issued, we feel that it is our Record of Decision. To undermine this with no engagement is to undermine us as a region and us as the indigenous Alaska Native Iñupiat. These IAP-EIS's are important to our region and borough for long-term economic sustainability. We need these projects.

Our level of participation was the same throughout the Willow Master Development Plan (Willow) as it was for the Greater Moose's Tooth GMT1 and GMT2 Developments. Willow is a very important new project in the region that can sustain our communities for

years into the future and continues to evolve our regional self-determination through the NSB. Our region, unlike many in the State of Alaska, is not run from government transfer funds either from the State or the federal government; we rely on the NSB to provide services. As mentioned before, it takes approximately \$400 MM per year to continue to support infrastructure within the eight communities of the North Slope. We have entered the first world and want to stay there – yet at this time there are no alternatives for us other than continued development of our oil resources.

Throughout the course of the NEPA process, BLM conducted frequent outreach to our communities. Because the NSB has statutory authority for planning, zoning, and permitting within its jurisdiction, the NSB Planning Department and Wildlife Management Departments; each separately reviewed the Willow project for compliance with its municipal code and incorporated additional mitigations on the Willow to address local concerns with respect to impacts to subsistence. During the Scoping Process for Willow the Master Development Plan received comments from the North Slope constituents requesting significant changes to the project. In addition, the project proponent, ConocoPhillips, held over 100 meetings with local NPR-A communities to listen directly to our concerns. As a result, BLM and the NSB worked with the applicant, to incorporate changes into a Supplemental Willow Master Development Plan EIS and Record of Decision. This implies that the system is working. It proves to our people that they do have a voice to make changes to the major project. It also proves that the BLM is active through consultation. And lastly, it proves that the project proponent values our input and listened to our concerns. Isn't this the way its supposed to work Madame Secretary? The outcome and revised Willow project may not be what some of the new DOI appointments would have liked however it followed a process that our local stakeholders participated in and support.

According to the BLM, Willow can provide the NSB ~\$1.2 bn in property tax revenue over the 30-year life of the project. On top of that, approximately \$2.3 bn will be made available through the NPR-A Impact Grant Fund Program which administers grants from the State portion of the federal royalties to offset develop impacts or improve communities impacted by development. These grant funds are critical to the small city governments that we represent by providing for local self-determination and critical additional infrastructure to improve the quality of life in our communities. It has taken over 40 years for industry development on federal land in NPR-A to begin (i.e., GMT1, GMT2 and now Willow) and just when the projections show a significant increase in grant revenue, for new infrastructure, maintaining operations, and supporting our residents, the future is now at risk due to policies of this administration. Projects like Willow are important in that they meet the requirements of EO 13985 which speaks to addressing racial inequality and providing jobs to underserved communities.

We are aware that several eNGO's have filed lawsuits against the project asking for environmental justice however where is the indigenous justice should we advocate for a project that can significantly benefit us? We agree that climate is changing because we are at the forefront of those changes in the Arctic. We also know that non-renewable resources are not the future, however we require time to find alternatives to sustain our economy. Two of our organizations in our region, the North Slope Borough, and the Voice of the Arctic Iñupiat (a non-profit comprised of tribes, municipal governments, ANCSA corporation, and educational institutions) have recently joined the Clean Hydrogen Coalition to look at alternatives in 'blue energy' on our way to green energy. Converting enormous volumes of natural gas stranded on the North Slope to hydrogen and sequestering the carbon may provide us with a steppingstone towards our next economy. We are not blind to change – one of the critical values of the Iñupiat culture is adaptation to change – we could not have survived in the Arctic for over ten thousand years without adapting to its changes.

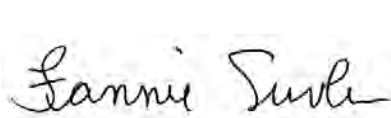
While your department, Madam Secretary, seems to be making decisions under the guise of EO 13990 and finding deficiencies in decisions made prior to its issuance we are finding in our review, several inconsistencies and an ambiguity embedded in the plethora of EO's and SO's and from our perspective they are not being used to help us but instead to further hinder local Iñupiat self-determination. We are asking you, Madam Secretary, to respect our participation and to not throw all our hard work away and start anew. That would be an affront to those of us who were actively consulted with by the BLM through the entire NEPA process on all projects within our region. You cannot have an EO requiring indigenous consultation and a second EO that completely ignores that consultation. This administration has called for transparency and yet we have not seen any transparency in and of the EO's or in your SO's. In fact, it seems to be the opposite, as Alaskan Native Iñupiat, we should have been invited for consultation with your department on each SO that has been issued so far – yet we have not. That speaks for itself.

We are asking you and your agencies not to undercut us as a people and to honor the work that we have done on the 2020 NPR-A IAP-EIS and the Willow Master Development Project. We know these are not projects that the environmental organizations are supportive of, but this was our land before it was the federal government, and you have people and inside your agency that have filed many lawsuits against decisions that have a significant effect on the well-being of the indigenous Iñupiat of the North Slope region.

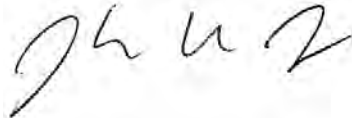
Thank you for your time and attention to our concerns. We look forward to future meetings and engagement both with you, Madam Secretary, and your department to better introduce ourselves and to provide additional information on the North Slope of Alaska.

Secretary Haaland Letter
April XX, 2021
City of Utqiagvik, City of Wainwright, City of Atqasuk

We hope that we can find times to meet face-to-face once COVID-19 restrictions are lifted. Again, congratulations on your confirmation as Secretary of the Department of the Interior.



Mayor Fannie Suvlu
City of Utqiagvik, Alaska



Mayor John Hopson, Jr.
City of Wainwright, Alaska



Mayor Doug Whiteman
City of Atqasuk, Alaska

Cc: Congressman Don Young
Senator Lisa Murkowski
Senator Dan Sullivan
Laura Daniel-Davis, Principal Deputy Assistant Secretary – Land and Mineral Management
Nada Culver – Deputy Director of Policy and Programs, Exercising delegated authority of the BLM director
Chad Padgett, Alaska State Director – Bureau of Land Management
Governor Dunleavy, State of Alaska

Attachments:

1. City of Utqiagvik Resolution #12-2021
2. City of Wainwright Resolution 2021-26
3. City of Atqasuk Resolution – 2021-05



CITY OF UTQIAGVIK

"Farthest North Incorporated City"

Introduced by:	Fannie Suvlu, Mayor
Date of Introduction:	March 18, 2021
Action:	Passed
Vote:	6 to 0

RESOLUTION NO# 12-2021

A RESOLUTION OF THE UTQIAGVIK CITY COUNCIL SUPPORTING OIL AND GAS DEVELOPMENT IN THE NPR-A FOR PROJECTS, LIKE THE WILLOW PROJECT.

WHEREAS, the City of Utqiagvik is located on the North Slope of Alaska and is a municipal government formed under the laws of the State of Alaska. Over 53.2% of the City residents are Native Alaskan Iñupiat; and

WHEREAS, the City is located within the municipality of the North Slope Borough ("Borough"); and

WHEREAS, the Borough is the area-wide local government for the northern portion of the State of Alaska, serving as the regional government for eight villages. The Borough has authority over the planning, platting, permitting, and zoning of lands within its boundaries, and is responsible for, or engaged in, environmental protection and wildlife management; and

WHEREAS, the Borough is a Home Rule Borough with authority analogous to, or greater than, that of county governments in other states, the Borough is a political subdivision and municipal corporation incorporated under the laws of the State of Alaska. As such, the Borough has authority over the planning, platting, permitting, and zoning of lands within its boundaries, and it is responsible for, or is engaged in, environmental protection and wildlife management; and

WHEREAS, among the Borough's Home Rule powers is the statutory authority to tax infrastructure for oil and gas development. The Borough's primary source of revenue derives from taxes levied on oil and gas infrastructure. These revenues provide significant economic benefit to the Borough and contribute funds that enable the Borough to provide essential services to its eight communities, including the City, and to employ many of its residents. The City receives a portion of the Borough's annual revenue to be used on public works, housing, new infrastructure, and capital improvement projects. The Borough is also the major employer in the City, and

WHEREAS, the City is also located within the National Petroleum Reserve – Alaska ("NPR-A") and is considered an impacted community with respect to oil and gas development in NPR-A, and



CITY OF UTQIAGVIK

"Farthest North Incorporated City"

WHEREAS, fifty percent of the revenue generated by oil and gas development is paid into the NPR-A Impact Grant Funds ("Grant") managed by the State of Alaska. The City is a recipient of and uses its Grant funds to provide for community projects to off-set the effects of oil and gas exploration and development to our residents; and

WHEREAS, the new Biden Administration has recently halted all new oil and gas leasing on federal lands; and

WHEREAS, the Administration has stated that lands already leased will be honored, because projects must go through permit application processes that include significant data submissions, public comment and government consultation periods and agency adjudications after the leases are issued but before development may take place; and

WHEREAS, the Administration has said that will review resource projects that have already been through extensive NEPA permitting processes, that included our Borough and Tribal Governments, and received a Record of Decision. These projects include, but are not limited to, the Willow Project located within the NPR-A; and

WHEREAS, the oil and gas companies operating on the North Slope have proven to be good neighbors as they have worked to minimize their development footprint and impacts to subsistence, have provided opportunities through their developments for jobs on the North Slope, have worked with our communities on improving education and access to higher education, and have worked to minimize impacts to the environment; and

WHEREAS, as the North Slope oil fields decline, it is vitally important to the City and the Borough that new fields, like the Willow Project, are developed to provide much needed revenue to the Borough from property taxes; and

WHEREAS, as an example, the Willow Project over its expected field life, is estimated to provide \$2.6 billion to the Grant Fund to communities most affected by oil and gas production in the NPR-A. And is estimated to provide an additional \$1.2 billion to the Borough through taxes, which means there will be significant funding made available to further improve living conditions, schools, and basic infrastructure for North Slope communities, and

WHEREAS, all oil and gas projects, like the Willow Project, on the North Slope and inside the NPR-A, go through a rigorous and extensive NEPA EIS process that includes the Borough as a Cooperating Agency and tribal councils through Government-to-Government consultation, and includes public forums, community outreach and comment periods, and has received a Record of Decision and has received all necessary approvals from the Borough, and



CITY OF UTQIAGVIK

"Farthest North Incorporated City"

WHEREAS, the time, resources, and costs of participating in the public process that the City has expended in the NEPA process for oil and developments, like the Willow Project, to protect our interests and economic well-being has been great, and

WHEREAS, we continue to seek timely and efficient solutions to resolve obstacles to the continued support for City, Borough and other North Slope communities; and

NOW, THEREFORE, BE IT RESOLVED THAT, the City Council strongly supports oil and gas development in the NPR-A for projects, like the Willow Project; and

BE IT FURTHER RESOLVED THAT, the Mayor of the City is hereby designated to act as the representative of the City in matters related to protection of its interests with respect to defending oil and gas projects within the NPR-A that will have a significant economic benefit to our community while also ensuring our subsistence resources are protected; and

BE IT FURTHER RESOLVED THAT, the representative identified above, together with the officers, management, and staff of the City, be directed and authorized to take all such actions necessary to give effect to this resolution.

PASSED AND APPROVED BY THE UTQIAGVIK CITY COUNCIL THIS 18TH DAY OF March, 2021 by a vote of 6 in favor and 0 opposed.

IN WITNESS THERETO:

By:

FANNIE SUVLU, MAYOR

ATTEST:

Esther Evikana, CITY CLERK





City of Wainwright

RESOLUTION NO. 2021-26

WHEREAS, the City of Wainwright (“City”) is located on the North Slope of Alaska and is a municipal government formed under the laws of the State of Alaska. Over 95.7% of the City residents are Native Alaskan Iñupiat; and

WHEREAS, the City is located within the municipality of the North Slope Borough (“Borough”); and

WHEREAS, the Borough is the area-wide local government for the northern portion of the State of Alaska, serving as the regional government for eight villages. The Borough has authority over the planning, platting, permitting, and zoning of lands within its boundaries, and is responsible for, or engaged in, environmental protection and wildlife management; and

WHEREAS, the Borough is a Home Rule Borough with authority analogous to, or greater than, that of county governments in other states, the Borough is a political subdivision and municipal corporation incorporated under the laws of the State of Alaska. As such, the Borough has authority over the planning, platting, permitting, and zoning of lands within its boundaries, and it is responsible for, or is engaged in, environmental protection and wildlife management; and

WHEREAS, among the Borough’s Home Rule powers is the statutory authority to tax infrastructure for oil and gas development. The Borough’s primary source of revenue derives from taxes levied on oil and gas infrastructure. These revenues provide significant economic benefit to the Borough and contribute funds that enable the Borough to provide essential services to its eight communities, including the City, and to employ many of its residents. The Borough is also the major employer in the City, and

WHEREAS, the City is also located within the National Petroleum Reserve – Alaska (“NPR-A”) and is considered an impacted community with respect to oil and gas development in NPR-A, and

WHEREAS, fifty percent of the revenue generated by oil and gas development is paid into the NPR-A Impact Grant Funds (“Grant”) managed by the State of Alaska. The City is a recipient of and uses its Grant funds to provide for community projects to off-set the effects of oil and gas exploration and development to our residents; and

WHEREAS, the new Biden Administration (“Administration”) has recently halted all new oil and gas leasing on federal lands; and

WHEREAS, the Administration has stated that lands already leased will be honored, because projects must go through permit application processes that include significant data submissions, public

comment and government consultation periods and agency adjudications after the leases are issued but before development may take place; and

WHEREAS, the Administration has said that will review resource projects that have already been through extensive NEPA permitting processes, that included our Borough and Tribal Governments, and received a Record of Decision. These projects include but are not limited to the Willow Project located within the NPR-A; and

WHEREAS, the oil and gas companies operating on the North Slope have proven to be good neighbors as they have worked to minimize their development footprint and impacts to subsistence, have provided opportunities through their developments for jobs on the North Slope, have worked with our communities on improving education and access to higher education, and have worked to minimize impacts to the environment; and

WHEREAS, as the North Slope oil fields decline, it is vitally important to the City and the Borough that new fields, like the Willow Project, are developed to provide much needed revenue to the Borough from property taxes; and

WHEREAS, as an example, the Willow Project over its expected field life, is estimated to provide \$2.6 billion to the Grant Fund to communities most affected by oil and gas production in the NPR-A. And is estimated to provide an additional \$1.2 billion to the Borough through taxes, which means there will be significant funding made available to further improve living conditions, schools, and basic infrastructure for North Slope communities, and

WHEREAS, all oil and gas projects, like the Willow Project, on the North Slope and inside the NPR-A, go through a rigorous and extensive NEPA EIS process that includes the Borough as a Cooperating Agency and tribal councils through Government-to-Government consultation, and includes public forums, community outreach and comment periods, and has received a Record of Decision, and

WHEREAS, the time, resources, and costs of participating in the public process that the City has expended in the NEPA process for oil and developments, like the Willow Project, to protect our interests and economic well-being has been great, and

WHEREAS, we continue to seek timely and efficient solutions to resolve obstacles to the continued support for City, Borough and other North Slope communities; and

NOW, THEREFORE, BE IT RESOLVED THAT, the City Council strongly supports oil and gas development in the NPR-A for projects like the Willow Project; and

BE IT FURTHER RESOLVED THAT, the Mayor of the City is hereby designated to act as the representative of the City in matters related to protection of its interests with respect to defending oil and gas projects within the NPR-A that will have a significant economic benefit to our community while also ensuring our subsistence resources are protected; and

BE IT FURTHER RESOLVED THAT, the representative identified above, together with the officers, management, and staff of the City, be directed and authorized to take all such actions necessary to give effect to this resolution.

Vacant, Mayor

[Signature]

Frederick Rexford, Member

Edward Kagak , Member

ATTEST:

[Signature]

Cheryl Panik, City Clerk

for:

[Signature]

John Hopson Jr., Vice Mayor

[Signature]

Jimmie Kagak, Member

Amos AguvlukNashookpuk, Member

[Signature]

Linda Agnasagga, Member

3/12/21

Date

CITY OF ATQASUK

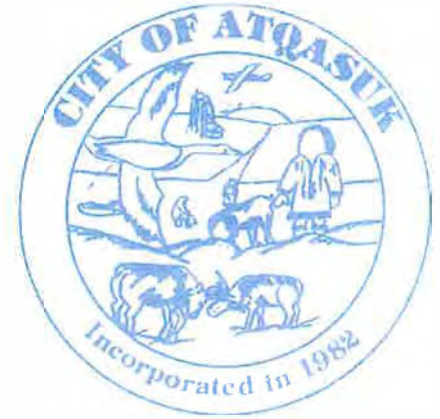
P.O. Box 91119

Atqasuk, Alaska, 99791

City Office Ph: 907-633-6811

Fax: 907-633-6812

Email: cityofatqasuk@hotmail.com



Douglas Whiteman, Mayor

Resolution No. 2021-05

A RESOLUTION OF THE CITY COUNCIL OF ATQASUK, ALASKA SUPPORTING OIL AND GAS DEVELOPMENT IN THE NPR-A

WHEREAS, the City of Atqasuk ("City") is located on the North Slope of Alaska and is a municipal government formed under the laws of the State of Alaska. Over 92% of the City residents are Native Alaskan Iñupiat; and

WHEREAS, the City is located within the municipality of the North Slope Borough ("Borough"); and

WHEREAS, the Borough is the area-wide local government for the northern portion of the State of Alaska, serving as the regional government for eight villages. The Borough has authority over the planning, platting, permitting, and zoning of lands within its boundaries, and is responsible for, or engaged in, environmental protection and wildlife management; and

WHEREAS, the Borough is a Home Rule Borough with authority analogous to, or greater than, that of county governments in other states, the Borough is a political subdivision and municipal corporation incorporated under the laws of the State of Alaska. As such, the Borough has authority over the planning, platting, permitting, and zoning of lands within its boundaries, and it is responsible for, or is engaged in, environmental protection and wildlife management; and

WHEREAS, among the Borough's Home Rule powers is the statutory authority to tax infrastructure for oil and gas development. The Borough's primary source of revenue derives from taxes levied on oil and gas infrastructure. These revenues provide significant economic benefit to the Borough and contribute funds that enable the Borough to provide essential services to its eight communities, including the City, and to employ many of its residents. The Borough is also the major employer in the City; and

WHEREAS, the City is also located within the National Petroleum Reserve – Alaska ("NPR-A") and is considered an impacted community with respect to oil and gas development in NPR-A; and

WHEREAS, fifty percent of the revenue generated by oil and gas development is paid into the NPR-A Impact Grant Funds (“Grant”) managed by the State of Alaska. The City is a recipient of and uses its Grant funds to provide for community projects to off-set the effects of oil and gas exploration and development to our residents; and

WHEREAS, the new Biden Administration (“Administration”) has recently halted all new oil and gas leasing on federal lands; and

WHEREAS, the Administration has stated that lands already leased will be honored, because projects must go through permit application processes that include significant data submissions, public comment and government consultation periods and agency adjudications after the leases are issued but before development may take place; and

WHEREAS, the Administration has said that it will review resource projects that have already been through extensive NEPA permitting processes, that included our Borough and Tribal Governments, and received a Record of Decision. These projects include, but are not limited to, the Willow Project located within the NPR-A; and

WHEREAS, the oil and gas companies operating on the North Slope have proven to be good neighbors as they have worked to minimize their development footprint and impacts to subsistence, have provided opportunities through their developments for jobs on the North Slope, have worked with our communities on improving education and access to higher education, and have worked to minimize impacts to the environment; and

WHEREAS, as the North Slope oil fields decline, it is vitally important to the City and the Borough that new fields, like the Willow Project, are developed to provide much needed revenue to the Borough from property taxes; and

WHEREAS, as an example, the Willow Project over its expected field life, is estimated to provide \$2.6 billion to the Grant Fund to communities most affected by oil and gas production in the NPR-A, and is estimated to provide an additional \$1.2 billion to the Borough through taxes, which means there will be significant funding made available to further improve living conditions, schools, and basic infrastructure for North Slope communities; and

WHEREAS, all oil and gas projects, like the Willow Project, on the North Slope and inside the NPR-A, go through a rigorous and extensive NEPA EIS process that includes the Borough as a Cooperating Agency and tribal councils through Government-to-Government consultation, and includes public forums, community outreach and comment periods, and has received a Record of Decision and has received all necessary approvals from the Borough; and

WHEREAS, the time, resources, and costs of participating in the public process that the City has expended in the NEPA process for oil and other developments, like the Willow Project, to protect our interests and economic well-being has been great; and

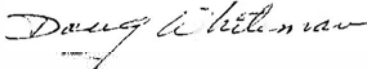
WHEREAS, we continue to seek timely and efficient solutions to resolve obstacles to the continued support for City, Borough and other North Slope communities; and

NOW, THEREFORE, BE IT RESOLVED THAT, the City Council strongly supports oil and gas development in the NPR-A for projects, like the Willow Project; and

BE IT FURTHER RESOLVED THAT, the Mayor of the City is hereby designated to act as the representative of the City in matters related to protection of its interests with respect to defending oil and gas projects within the NPR-A that will have a significant economic benefit to our community while also ensuring our subsistence resources are protected; and


BE IT FURTHER RESOLVED THAT, the representative identified above, together with the officers and staff of the City, be directed and authorized to take all such actions necessary to give effect to this resolution.

PASSED AND APPROVED by a duly constituted quorum of the City Council for the City of Atqasuk on the 5th day of April, 2021.

 04-06-21

Douglas Whiteman, Mayor Date

ATTEST:

 04-06-21

Sherlene Oyagak, City Clerk Date



NATIVE VILLAGE OF BARROW IÑUPIAT TRADITIONAL GOVERNMENT

March 4, 2022
Ms. Stephanie Rice
Project Manager
Bureau of Land Management
222 W. 7th Avenue, Stop #13
Anchorage, AK 99513
srice@blm.gov.

Re: Willow Project SEIS Scoping Comments

Dear Ms. Rice,

I hope the day finds you well. The Native Village of Barrow (NVB) submits these scoping comments on the Supplemental Environmental Impact Statement NEPA process for the Willow Development proposed by ConocoPhillips Alaska in the National Petroleum Reserve – Alaska (NPR-A). NVB is a federally recognized tribe, located in Utqiagvik, Alaska and our tribal members live within the boundaries of the NPR-A.

We understand that BLM is preparing a Supplemental Environmental Impact Statement for the Willow Development to address deficiencies identified in the August 21, 2021 U.S. District Court of Alaska decision. The Native Village of Barrow urges BLM to focus only on the issues identified in the court decision and complete this supplemental NEPA process as quickly as possible, so that the project can begin construction during the next winter season. The project has already undergone over 140 days of public comment, over 12 public hearings, and an extensive review and an approval process by the North Slope Borough.

Our tribal members are also residents of the North Slope Borough (NSB) which provides key services for its communities such as education, public health, public utilities and infrastructure (clean water, solid waste, roads, etc.) and safety (fire, police, search and rescue). The costs of this infrastructure are high and the NSB's ability to provide for basic needs comes from its taxing authority over the oil industry on the North Slope. According to the BLM, Willow can provide the NSB with approximately \$1.2 bn in property tax revenue over the 30-year life of the project, which will be essential to providing for our tribal members and communities.

Letter from NVB to BLM re Willow project
Supplemental EIS

ConocoPhillips has engaged with North Slope residents for over 50 years and they are a responsible operator with a history of collaborating with our communities and working with us to protect our subsistence resources and lifestyle while contributing to our long-term local economic sustainability. They have made changes to the project and incorporated significant mitigations to protect the subsistence resources and lifestyle of our people which we support.

We urge BLM to listen to the people of the North Slope and complete a focused Supplemental EIS in a timely manner so that the project can move forward.

Sincerely,



Mary Jane Lang
Executive Director

November 22, 2022

The Honorable Deb Haaland
Secretary
United States Department of Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Secretary Haaland,

I write to you today on behalf of the membership of the Voice of the Arctic Iñupiat (Voice), regarding the Willow Project, a development project located on the ancestral homelands of the North Slope Iñupiat, and within the National Petroleum Reserve – Alaska (NPR-A).

Voice was established in 2015, in part to address and speak on issues important to Alaska’s North Slope Iñupiat. Our twenty-four-member board of directors is comprised of the city mayors, tribal leaders and Alaska Native village corporation (ANC) presidents from seven North Slope communities, as well as the heads of our regional tribe, Alaska Native corporation, borough government, tribal college, health care non-profit and school district. Over the past fifty years, our people have overcome significant challenges and obstacles to build many of the organizations that are the bedrock of our region’s story of indigenous self-determination.

For the North Slope Iñupiat, the Willow Project is a new opportunity to ensure our communities and our people have a viable future. If our region, our state and our nation are to fully realize Willow’s economic development and energy security benefits, now is the time to advance the approval process.

The Bureau of Land Management (BLM) recently completed its fifth comment period for Willow. This well-studied, well-thought-out project would provide critical economic benefits and long-term stability to the people of Alaska’s remote North Slope. In addition to more than \$6 billion of estimated federal and state revenue, Willow is expected to generate \$1.25 billion for the North Slope Borough (Borough) — funding that supports education, police and fire protection, law enforcement and other basic services.

Willow is also projected to add over \$2.5 billion to the NPR-A Impact Mitigation Grant Program, which allows for our communities within and near the NPR-A priority use of funding for projects that support long-term, public quality of life improvements, including social services support and youth programs. In the past decade, our communities have been awarded over \$65 million in grants through the Impact Mitigation Grant Program to aid in sustaining our Arctic communities.

Outside activist groups opposing Willow have drowned out local perspectives and are actively working to supersede the views of the Alaska Native people who live in proximity of the proposed project. We have grown tired of the relentless attacks on our people and communities by these outside organizations. We understand the complexity of the Willow Project — and know full well that moving ahead with Willow is in the best interests of our Iñupiaq communities.

The outside organizations that oppose the project want you to think jobs for locals will not be provided by the development of the Willow Project. This is simply not true. Willow will not only create new job

opportunities directly related to the project, but it will also create new revenue for the Borough through its ability to tax oil and gas infrastructure in our region. This revenue funds jobs and services in every community on the North Slope.

The Borough is the largest employer in the region. By opposing Willow, outside organizations are fighting against our Borough government's tax base and its ability to serve residents. Without this tax revenue, the Borough will not be able to continue funding basic services, will lay off employees and bring our communities to ruin. In addition to the jobs at the Borough, many Alaska Native village and regional corporations offer contract support services through the lifetime of development projects, creating more jobs.

One must ask: With what do the organizations that oppose Willow suggest we replace much-needed jobs and services if projects like Willow are not allowed to move forward? The unfortunate truth is that they do not have solutions to address the needs of our communities and our people, nor do they acknowledge that their push to stop Willow significantly deteriorates Iñupiat self-determination.

The very organizations that claim to care so much about the Arctic willfully ignore the needs of the people and communities on the North Slope. Even more, these organizations co-opt our ancestral homelands as a means to fundraise to stop projects that are the backbone of our regional economy. This is not environmental justice or any other kind of justice: It is a direct attack on Alaska Native self-determination.

Consultation is a right afforded to federally recognized tribes and ANCs. It is available as a means, partly, for indigenous communities to engage with the federal government on actions its proposing that could impact Tribal or ANC lands, water areas, and resources, among other things. Outside of the legal definition of consultation, the principle of consultation is often used as a synonym for open communication and or collaboration with indigenous communities and entities.

Consultation, both the legal definition and the principle, are frequently referenced when there are large scale projects on, or adjacent to, indigenous lands. Consultation, or the lack thereof, is also raised by many outside, non-indigenous organizations as a basis to oppose projects, claiming that the government has not properly consulted with indigenous communities before moving forward with a project.

If the principles of consultation, open communication and collaboration are foundational beliefs of so many of the organizations that oppose Willow, then one must ask another question: Have the organizations that so violently oppose Willow engaged in an iteration of consultation with our region's collective leadership to learn if we support or oppose the project before they began speaking out against it? The answer is a resounding NO.

Responsible resource development with the inclusion and meaningful engagement of North Slope Iñupiat has taken place for over fifty years and exemplifies a positive model of cultural, economic and ecological interdependence.

North Slope Iñupiat are a living example of a harmonious duality – perpetuating our millennia-old subsistence-based culture by making necessary adaptations to thrive in a modern world based on a cash economy. A modern world where access to cash is needed to support our subsistence practices. Understanding and embracing that interdependence is paramount to the future sustainability of the North Slope Iñupiat culture and traditions. We have always been good stewards and protectors of our

land and its many resources. To suggest that because we support responsible resource development means that we do not care about our ancestral homelands and our people is offensive. Anyone that believes this has bought into a false narrative pushed by outside groups that do not care about the North Slope Iñupiat or care to educate themselves on the challenges we have successfully overcome to sustain our people, our culture and our communities.

Willow has bipartisan support in Alaska. Governor Mike Dunleavy (R) has been a steadfast supporter of the project. Rep. Mary Peltola (D-AK), the first Alaska Native woman in Congress joined forces with Sens. Lisa Murkowski (R-AK) and Dan Sullivan (R-AK) to advocate for the Iñupiat communities of the North Slope and all Alaskans, encouraging the BLM to approve Willow by the end of the year. Our region's leadership appreciates the continued advocacy by Alaska's elected officials on behalf of the North Slope Iñupiat.

Our region is ready for construction to start on Willow now. Economic opportunities on the North Slope are limited, making the prompt approval of this project invaluable to sustaining our livelihoods. Without these projects and their crucial economic benefits, many of our people would be forced to leave the lands they have inhabited for thousands of years and thereby extinguishing many of the important characteristics of Iñupiaq culture that define us.

With bipartisan endorsement, widespread support from the people living on the North Slope and real economic benefit for not only Alaska Native communities, but Alaskan residents in general, BLM must approve the Willow Project this year. We must move as quickly as possible — the livelihood of our people and the economic vitality of our communities depend on it. We appreciate your attention to the voices of our people on this project.

Sincerely,
Nagruk Harcharek



President
The Voice of the Arctic Iñupiat

cc: U.S. Senator Lisa Murkowski, Alaska
U.S. Senator Dan Sullivan, Alaska
U.S. Representative Mary Peltola, Alaska
Governor Mike Dunleavy, Alaska
Tracy Stone-Manning, Director of Bureau of Land Management
Bryan Newland, Assistant Secretary of the Interior for Indian Affairs
Tommy Beaudreau, U.S. Deputy Secretary of the Interior
Steve Cohn, Alaska Director
Stephanie Rice, Project Lead
Raina Thiele, Senior Advisor for Alaska Affairs and Strategic Priorities
PaaWee Rivera, Senior Advisor and Director of Tribal Affairs

THE VOICE OF THE ARCTIC IÑUPIAT RESOLUTION

NO. 2022-02

Advancing the Willow Project to ensure a stable economic foundation for North Slope residents and communities

WHEREAS The Voice of the Arctic Iñupiat (the “Corporation”) is a 501(c)(4) nonprofit formed under the laws of the State of Alaska; and

WHEREAS, the Corporation’s purpose, as defined in its Articles of Incorporation, is to:

promote the social welfare of the Iñupiaq people of the Arctic Slope...including, but not limited to: developing local advocacy and engagement for the Iñupiat of the Arctic Slope to state, federal and international forums addressing Arctic issues; promoting an understanding of the North Slope economy within the region and encourage culturally safe and responsible development for economic sustainability; developing local content and responses with respect to activities within the region that allow for protection of the lands, waters and subsistence resources used by the Arctic Iñupiat for thousands of years; acting to protect the interests of the Arctic Iñupiat; becoming the local knowledge center for the communities and people regarding developments in the Arctic Slope region; and being a conduit for information transfer with outside organizations, including both governmental and non-governmental entities

; and

WHEREAS the North Slope Iñupiat have inhabited their ancestral homelands, which span roughly 58 million acres across Arctic Alaska, for over 10,000 years; and

WHEREAS the North Slope Iñupiat have adapted to thrive in the Arctic, living off the aquatic and land resources to sustain their lifestyle, traditions and culture; and

WHEREAS the Alaska Native land claims fight was a turning point in how North Slope Iñupiat engaged with the federal government; and

WHEREAS the Alaska Native Claims Settlement Act (ANCSA) had one voice of opposition, the North Slope Iñupiat; and

WHEREAS the region’s opposition to ANCSA spurred the creation of the North Slope Borough, to ensure that there was a mechanism to capture the economic benefits of the oil and gas development that would take place on their ancestral homelands – an act of Iñupiat self-determination; and

WHEREAS the North Slope Borough exists to provide services like police and fire protection, village health clinics, search and rescue operations, education and others; and

WHEREAS the North Slope Borough can provide services to its residents and communities due to its ability to tax the infrastructure that supports oil and gas development, which comprises over 90 percent of the Borough's tax receipts; and

WHEREAS the 23-million-acre National Petroleum Reserve-Alaska (NPR-A), formerly known as the Naval Petroleum Reserve Number 4, located on Alaska's North Slope, was set aside by President Warren Harding in 1923 as an emergency oil supply; and

WHEREAS oil and gas leasing in the NPR-A is authorized under the Naval Petroleum Reserve Production Act of 1976, as amended including the Department of Interior Appropriations Act of 1981; and

WHEREAS responsible resource development, with the inclusion and meaningful engagement of North Slope Iñupiat has taken place for over fifty years, has created an opportunity to exemplify a positive model of cultural, economic, ecological interdependence; and

WHEREAS the region and communities benefit from responsible development on the North Slope, through, among other things, continued strengthening of the Borough's tax base, employment opportunities across the North Slope entities, contracting opportunities for the tribes and Alaska Native corporations, and more specifically, access to funding for community projects through the National Petroleum Reserve-Alaska Impact Mitigation Grant Program; and

WHEREAS the Board of Directors of the Corporation comprised of representation from all of the members of the Corporation, recognize the need by the Biden Administration to advance the Willow Project to further support the economic foundation of the North Slope region and ensure the sustainability and viability of its eight communities and the Iñupiaq culture.

NOW THEREFORE BE IT RESOLVED THAT the Board of Directors hereby approves and stands in support of the advancement of the Willow Project by the Biden Administration and urges the release of the project's Record of Decision by end of 2022.

BE IT FURTHER RESOLVED that the Corporation's management are hereby authorized and directed to take all such action necessary to give effect to this resolution.

RESOLUTION SPONSOR(S):

Iñupiat Community of the Arctic Slope
North Slope Borough
Arctic Slope Regional Corporation

CERTIFICATION

I, Martha Monnin, do hereby certify that I am the Secretary of this Corporation, organized and existing under the laws of the State of Alaska; that a meeting of the Board of Directors of the Corporation was duly held on November 3, 2022; that notice of the meeting was duly given; that a quorum attended and participated; and that the foregoing resolution was duly adopted.

In witness whereof, I have hereunto set my hand, by order of the Board of Directors of the Corporation, this 3rd day of November, 2022.

Martha Monnin
Martha Monnin (Nov 3, 2022 12:33 AKDT)

Secretary

ATTEST:

Rex Allen Rock Sr
Rex Allen Rock Sr (Nov 3, 2022 12:36 AKDT)

Rex A. Rock, Sr.
Chair



August 29, 2022

Ms. Stephanie Rice
Project Manager for Willow Project Remand & Additional NEPA Analysis
Bureau of Land Management Alaska State Office
222 West 7th Avenue, Mailstop #13
Anchorage, AK 99513

Submitted by e-mail to: srice@blm.gov

Re: Kuukpik Corporation Comments on the
BLM's Second Draft Supplemental EIS for the Willow MDP and
ANILCA Section 810 Analysis

Dear Ms. Rice:

These comments on the second Draft Supplemental EIS for the Willow Master Development Plan are submitted by Kuukpik Corporation ("Kuukpik") on behalf of Kuukpik, our board of directors, and our shareholders in Nuiqsut and beyond.

Kuukpik is the Alaska Native Claims Settlement Act ("ANCSA") village corporation for Nuiqsut, the village that will be most impacted by the Willow Project. In that capacity, Kuukpik's twin goals are protecting the subsistence lifestyle and culture of the Native residents of Nuiqsut, while also providing for long-term economic needs of our shareholders.¹ Kuukpik is also the only private landowner in the immediate Willow area. Nuiqsut's subsistence hunters have long relied on that privately-owned and managed land – much of which is situated between Nuiqsut and the Willow Project Area -- to feed the entire community, as well as our families and friends throughout the entire North Slope.² As you know, this proximity to the proposed Project

¹ We also wish to note that in 2021, Kuukpik accomplished its long-time goal of enrolling a new generation of shareholders into the corporation, thereby extending the number of individuals and families who can benefit from whatever economic success Kuukpik is able to achieve and participate in the governance of the corporation. The Draft SEIS should be updated to reflect that development (*see* Willow MDP Draft SEIS (2022), Vol. 1, p. 258). The data at Volume 1, page 249 suggesting that the number of households receiving dividends from Kuukpik is declining is also therefore almost certainly inaccurate and out of date.

² *See* Willow MDP Draft SEIS (2022), Vol. 1, p. 257:

The communities of the North Slope share a cultural identity and have close social and kinship ties, both within and between individual communities... Sharing is a key Iñupiaq value that strengthens social ties and promotes the continuation and transmission of cultural values and traditions. Many subsistence traditions, such as the bowhead whale hunt, are centered on the sharing and distribution of subsistence foods across communities and regions (*see* Section 3.16.1.2, Definition of Subsistence). The NSB's 2019 economic

has generated tremendous concern regarding Willow’s potential impacts on subsistence – and with it, the very fabric and culture of Nuiqsut.

As you and other representatives of BLM have heard loud and clear, Nuiqsut depends on its subsistence way of life not just for food, but for the kind of sustenance that can’t be found at the grocery store. The practicing of subsistence, the sharing of resources, the passing along of knowledge from one generation to the next, over and over again for millennia: these are the things that nourish our community, that bind us together and bind us to the land that, in return, nourishes our bodies.³

But the land cannot sustain our community if the community doesn’t do its part to protect our subsistence resources in the face of a seemingly never-ending effort to develop more, drill farther, build bigger. So Kuukpik – like the elders who settled Nuiqsut, and like all the residents who hold subsistence and all it brings to our community so dear – has dedicated itself to making sure that subsistence is at the forefront of every conversation regarding development that could affect our lifestyle and our community. No one should ever expect anything less from the people of Nuiqsut, or from Kuukpik.

The past four years have put these values to the test. Ever since the first project design was put forward in about 2018, Kuukpik has struggled to get comfortable with the Project. Located about 10 miles west of Kuukpik-owned lands, there has never been any doubt that the Project will impact Nuiqsut in countless and unpredictable ways. At the same time, Kuukpik has always believed that, if carried out responsibly, the Project could bring much-needed benefits to the community, the Borough, and the State of Alaska. So Kuukpik did what we’ve always done: analyzed the Project proposals, studied the environmental analysis, and tried to find constructive ways to reduce the Project’s impacts, increase its benefits, and develop a version of the Project that responds to the community’s concerns. Developing a version of the Willow Project that is balanced and responsible, that avoids as many unnecessary impacts as possible, and brings benefits to offset unavoidable impacts has always been Kuukpik’s goal.

To that end, we have spent four years exploring ways to improve the proposed Project and urging BLM to incorporate these suggestions into its alternatives analyses. Some suggestions, like eliminating the ill-fated Module Transfer Island, were adopted pretty quickly.

profile and census report documented that in 2019, 88% of households shared subsistence foods within their own community, 54% shared with other NSB communities, 52% shared with households in Anchorage, 30% with NANA communities, 26% with Fairbanks, and 22% with other Alaskan communities (NSB 2020). Thus, subsistence harvests on the North Slope are distributed widely throughout the State of Alaska.

³ See *id.*, p. 257.

Others, like relocating the northern drill site farther south and the southern drill site farther north, have taken more time. But that’s what the process is all about.

Kuukpik is pleased that Alternative E includes many of the concepts that we and other stakeholders have proposed during this process. As explained in more detail below, we believe Alternative E strikes a more appropriate balance between the need to develop oil and gas resources on the North Slope and the need to ensure that Nuiqsut residents can continue to practice a subsistence lifestyle for generations to come.

For that reason, Kuukpik believes Alternative E should be carried forward as BLM’s Preferred Alternative. We also believe Alternative E is the only proposed alternative that would allow BLM to make the necessary findings to fulfill its responsibilities under ANILCA Section 810. BLM’s analysis demonstrates that Alternative E is the only currently proposed alternative that takes sufficiently “reasonable steps...to minimize adverse impacts to subsistence uses and resources.” Alternative E is therefore the only alternative that Kuukpik can support.⁴

Having said that, we are under no illusions that Alternative E will avoid all the impacts that Kuukpik has been concerned about all along. BLM’s analysis confirms that, concluding that Willow will impact Nuiqsut’s subsistence lifestyle no matter which alternative is selected.⁵ There is simply no way to build a Project this big, in this location, without causing impacts. Kuukpik understands that---we’ve always understood it. That’s why Kuukpik’s goal has never been to eliminate all impacts; we know that’s impossible. Rather, our goal has been to eliminate as many unnecessary impacts as feasible while still seeing the Project proceed. Because the world needs oil; the North Slope Borough and the State of Alaska need oil. For many years, Nuiqsut has endured the impacts of supporting those needs. And we can continue to do so with Willow, but only if the decisionmakers in Anchorage, Juneau, and Washington D.C. continue to listen to our community, continue to seek balanced and responsible oil development, and continue looking ahead and planning for the future.

I. Alternative E includes many elements that Kuukpik supports.

Having spent so much time urging BLM to analyze different alternatives and elements of the proposed project, we think it’s important to acknowledge how many of those elements are included in Alternative E. Kuukpik appreciate BLM’s effort to work with us to incorporate

⁴ This assumes that the major analyses and conclusions contained in the Draft SEIS do not change much in the Final SEIS, which we believe is a safe assumption.

⁵ See Willow MDP Draft SEIS (2022), Appx. G, ANILCA 810 Analysis, for example, which reaches essentially the same conclusions regarding impacts to subsistence for all primary action alternatives and the cumulative case (except Alternative D).

meaningful efforts to reduce the Project's impacts. We want to highlight the main elements that allow Kuukpik to support Alternative E.

A. Reduced number of drill sites and shorter gravel road system

The most obvious and defining difference between Alternative E and all prior alternatives is the proposal to develop Willow with three or four drill sites instead of five. Kuukpik has advocated for this change specifically. In our December 13, 2021, letter to BLM (p. 6), we asked BLM to analyze

[A] consolidated development option that would involve either 3 or 4 total drill sites, with the northernmost drill site farther south than previously envisioned and, potentially, the southernmost drill site farther north. Kuukpik has provided extensive information demonstrating why those alternatives might be preferable from a subsistence perspective and why they should therefore be examined in the upcoming second supplemental DEIS.

That's exactly what Alternative E is. It would move the northernmost drill site about 5 miles to the south and the southernmost drill site about 2 miles to the north, reducing the overall north-south road from about 38 miles to about 31 miles. BLM succinctly summarized some of the benefits that flow from that change as follows:

Under this alternative, there would be 43,040 fewer ground traffic trips and 100 fewer helicopter trips than Alternative B. Alternative E would have a total of 7.1 fewer miles of gravel road, 64.0 fewer miles of ice road, a 51.1-acre-smaller footprint, and 1 fewer year of construction as compared to Alternative B, with the majority of the decreases occurring in the TLSA. The decrease in the length of the northern infield road relative to Alternative B would lower the amount of direct habitat loss, decrease the potential displacement of caribou near the road, proportionally lower the possibility of vehicle-wildlife collisions, and would lower the potential for alterations of caribou movements. Fewer caribou would encounter the shorter road and because the road is shorter, it would be easier for caribou that did encounter the road to divert their movements around the north end of the road rather than cross it.⁶

These are the exact reasons Kuukpik has long urged BLM to develop an alternative that would reduce the north-south barrier associated with the original five drill site alternatives:

Kuukpik is deeply concerned that the proposed ... road extending directly north-south in this area will be a major deterrent to migrating caribou, particularly those

⁶ Willow MDP Draft SEIS (2022), Vol. 1, p. 305.

moving from Teshekpuk Lake in the west to areas east of Nuiqsut. These are the animals that are most important for Nuiqsut hunters because they pass closest to the village and are therefore more accessible and abundant in areas Nuiqsut hunters use the most. We fear that an elevated north-south road and pipeline directly perpendicular to the majority of the migration could deter and deflect the migration far away from Nuiqsut.⁷

Alternative E responds to these concerns. BLM’s analysis confirms that Alternative E would reduce (but not eliminate) the likelihood of the extreme deflection that Kuukpik has been concerned about:

This alternative also moves BT5 farther east which would reduce the length of the BT5 road. Overall, Alternative E would include fewer miles of gravel and ice roads than Alternative B thus reducing habitat loss and linear infrastructure which could deflect or delay caribou movement into the community’s hunting area.⁸

So even though Alternative E doesn’t eliminate as much gravel road as Kuukpik would have liked,⁹ it is a significant improvement over Alternative B and strikes an acceptable balance.

Part of this balance is due to the fact that Alternative E includes *some* additional gravel roads (which facilitates subsistence access), but not as much as was originally called for (thereby reducing the picket fence barrier). This approach will cause less impacts than Alternative B, but provide more access than alternatives like C and D. We still don’t know how many subsistence users will drive all the way to the end of these roads unless game is scarce closer to Nuiqsut (which will continue to be a possibility), but at least hunters will have the option if they want or need it.¹⁰ The combination of reduced impacts in the most critical northern areas of the Project

⁷ See Kuukpik’s September 28, 2018 Letter to BLM, p. 7.

⁸ Willow MDP Draft SEIS (2022), Vol. 1, p. 288.

⁹ *Id.*, p. 289:

However, despite the decrease in infrastructure within the TLSA, caribou that migrate through this area during the fall migration will likely still encounter road infrastructure, including the pinch point where the access road intersects with infield roads. This is because Alternative E, like Alternative B, includes gravel road connections between all drill sites and to the existing development at GMT-2.

¹⁰ See Kuukpik’s December 13, 2021 Letter to BLM, pp. 14-15, where we described why many subsistence hunters may not utilize the roads all the way to the farthest drill sites (then-BT4 and BT5). The Draft SEIS (at Vol. 1, p. 294) confirms Kuukpik’s point: “subsistence hunters generally do not travel farther than necessary due to the high cost of travel.” *But see* Willow MDP Draft SEIS (2022), Vol. 1, p. 284: “[W]hen caribou do not migrate toward the community at the expected times, hunters use the road system to access herds instead. In this sense, access to the road is important in mitigating the impacts of

area, *some* additional road access, and the three proposed subsistence use boat ramps¹¹ results in a more balanced alternative that reduces impacts but facilitates access to new areas that may become increasingly more important if caribou movement and hunter access are impacted elsewhere.

B. Reduced impacts within the TLSA

Kuukpik has also argued that none of the prior alternatives went far enough in implementing BLM’s legal obligation to assure the maximum protection of caribou within the TLSA. The TLSA (and Teshekpuk Lake Caribou Habitat Area, the “TLCHA”) were set aside because of the importance of these northern coastal areas to migrating caribou. Although development in these areas is not prohibited, Kuukpik continues to believe that the burden should always be on the applicant to justify building permanent facilities in these extremely sensitive and important areas. If placement within the Special Areas so is truly unavoidable, the applicant can still be required to make significant project changes in order to provide “maximum protection” for caribou and the subsistence users who depend on them.¹²

Alternative E is the first formal alternative that makes real strides towards that goal. By consolidating BT4 and BT2 into a single drill site, the day-to-day impacts that come with constructing and then operating a drill site in the TLSA will be cut in half. The change also eliminates 45.37 acres of gravel fill (43% of the total) in the TLSA compared to what was

the road on caribou availability.” In short, roads are a double-edged sword and another factor to be balanced in the overall effort to design a responsible project. That said, we want to highlight BLM’s point that although providing access to new areas helps put meat in the cellars, it doesn’t replace the cultural connection associated with hunting in more traditional areas. See *id.*, p. 337:

The mitigative benefits of using roads for subsistence hunting does not account for the negative sociocultural impacts associated with changes in hunting methods and areas, resulting loss of traditional knowledge, increased impacts associated with hunting in proximity of development, and direct loss of traditional hunting areas. Thus, roads may mitigate the impacts of development but may not provide a net benefit to communities in regard to subsistence.

¹¹ Willow MDP Draft SEIS (2022), p. 285:

[T]he boat ramps could have substantial benefits to some users. The use of Fish (Iqalliqpik) Creek for subsistence purposes has declined in recent years, with residents citing fuel costs and difficult travel and navigation conditions (e.g., shallower waters near the mouth of Fish [Iqalliqpik] Creek) for the decline in use. Northern Economics Inc. (2019) reports that for summer and fall caribou hunting, trips to Fish and Judy Creek were among the most expensive, at an estimated \$157.80 per trip. A boat ramp on the Ublutuoch (Tijmiasiuġvik) River could facilitate access to this traditionally important subsistence harvesting area.

¹² 42 U.S.C.S. § 6504(a).

proposed under Alternative A,¹³ which is significant by itself, but even more so because the avoided impacts are farther north, closer to the coast, where the impacts would be most severe.¹⁴ These changes make Alternative E vastly preferable to Alternative B.

The difference between the two alternatives is occasionally lost in the Draft SEIS's discussion of "direct" versus "indirect" impacts. An example is the following:

An analysis of subsistence uses specific to the TLSA vis-à-vis the alternative analysis areas shows that, in terms of direct impacts to Nuiqsut hunters, the reduction in infrastructure in the TLSA under Alternative E will not result in a substantial reduction in direct impacts on Nuiqsut subsistence harvesters compared to the other action alternatives. The area of reduced infrastructure will occur in an area that sees less harvesting activity relative to the rest of the alternatives analysis area.¹⁵

The Draft then goes on to cite statistics showing that there are not many caribou caught in the area that would be directly impacted (*i.e.*, gravel on the tundra) in the TLSA under Alternative B but *not* under Alternative E. Although the passage concludes by acknowledging that there are significant reductions in *indirect* impacts under Alternative E,¹⁶ the lengthy discussion on *direct* impacts may leave the reader with the impression that there is little difference between the two alternatives.

We want to be very clear that Kuukpik believes the reduction in *indirect* impacts is significant enough to weigh very heavily in favor of Alternative E despite what, on paper, may appear to be only modest reductions in *direct* impacts to hunter success. The number of caribou caught in the undeveloped area isn't the determinative factor here; the fact that tens of thousands of caribou will more freely bare calves and have the opportunity to migrate through an

¹³ Willow MDP Draft SEIS (2022), Vol. 1, p. 207.

¹⁴ *Id.*, p. 288:

As described in Section 3.12.2.6, *Alternative E: Three-Pad Alternative (Fourth Pad Deferred)*, Alternative E would reduce gravel infrastructure within the TLSA by 43% and would move infrastructure farther from high-density calving areas and preferred mosquito-relief habitat. The amount of pipeline within 500 feet of gravel roads, which increases the likelihood of caribou displacement or deflection, would decline by approximately 30%. In particular, the reduction in roads and other infrastructure to the north of Fish (Uvlutuuq) Creek would reduce potential obstructions during the fall migration, when Nuiqsut residents hunt caribou as they migrate south and east toward the Colville River.

¹⁵ *Id.*, p. 289.

¹⁶ *Id.*: "[W]hile the reduction of infrastructure in the TLSA under Alternative E will not result in a substantial reduction in direct impacts on Nuiqsut subsistence harvesters, as discussed above, it does lessen the potential for indirect impacts to resource availability."

undeveloped area towards Nuiqsut is. The decreased impacts on the herd as a whole are much more important than impacts on hunter success in the TLSA itself. That said, if hunters begin to use the road to BT2 to access the areas north of there more than they have historically, then there may in fact be more benefit than the Draft EIS acknowledges to leaving more of that area undeveloped.

The reduced direct impacts to goose hunting in the area north of BT2 should not be overlooked either.¹⁷ Although impacts to goose hunting are far more likely to be temporary than impacts to caribou populations or movements, spring goose season is a time-honored and cherished tradition for the community. The reduced impacts to goose hunting under Alternative E is therefore another point in its favor.

C. Developing the Project in Two Phases

Kuukpik commends BLM for developing a responsive solution to several concerns Kuukpik previously raised. One concern we had with the proposal Conoco put forward in response to Judge Gleason’s decision was the possibility that the remand – driven largely by the need to explore ways to reduce the project’s impacts – would result in a Record of Decision that approved four drill sites instead of the three that were approved in the 2020 ROD.¹⁸ Since that would have represented a “step back” rather than an improvement, we urged BLM to consider authorizing three drill sites now, but defer consideration of any others. Kuukpik has also suggested throughout this post-remand NEPA process that analyzing and approving Willow in phases would allow stakeholders to observe and respond to impacts over time.¹⁹

¹⁷ See Willow MDP Draft SEIS (2022), Appx. G, ANILCA 810 Analysis, p. 37-9.

¹⁸ See Kuukpik’s March 9, 2022 Letter to BLM:

So in some ways, the three drill site Willow Project that was approved in BLM’s ROD – standing alone, and without taking into account the other two drill sites that could have been approved later – may actually be preferable to the four drill site Alternative BT2N Conoco is suggesting now. It would be ironic (and bad form) if the court’s remand and instruction to develop a new alternative focused on reducing impacts in the TLSA resulted in BLM approving an alternative that includes more drill sites than the previous ROD, not less, one of which is in a more sensitive area farther north than the previously approved northernmost site.

¹⁹ See Kuukpik’s December 13, 2021 Letter to BLM:

Another option is to authorize Willow in phases. For example, the core Willow facilities and 2-3 drill sites could be approved in the next 12-24 months and construction carried out over the next few years. Kuukpik would then want to see a meaningful delay (at least 3-5 years after Phase 1 construction was complete) before any additional drill sites are constructed to allow time for Willow’s impacts to become better understood, both through scientific studies and traditional knowledge and local observation.

We are therefore pleased that BLM has adopted that suggestion and is using it to address Kuukpik’s concern regarding the total number of drill sites. By proposing to authorize only three drill sites under Alternative E, BLM ensures that this remand does not result in an arguably *more* impactful project than the 2020 ROD. And while we recognize that the fourth drill site will likely be authorized and constructed eventually, Alternative E essentially eliminates the possibility that a *fifth* drill site will ever be constructed in the northern Project area. The 2020 ROD adopting Alternative B never included any such assurance even though the fourth and fifth drill sites were not approved at that time. Both drill sites probably would have been approved, and maybe even without much delay. Permanently eliminating the fifth drill site under Alternative E is preferable to simply delaying its approval under Alternative B. Phasing the construction also spreads impacts out in a way that Kuukpik had not previously considered, but which seems beneficial.

In addition to decreasing the intensity of construction impacts, phasing approval and construction of BT2 will give stakeholders time to observe and study Willow’s impacts on caribou and subsistence. We should also use this time to think creatively about other ways to offset whatever impacts do occur. Willow is a project unlike any we have seen since Alpine and its early satellites. No matter which Willow alternative is selected, we all need to prepare for the possibility that caribou herds and migrations will change in potentially dramatic ways over the coming decade due to the cumulative impacts of development, climate change,²⁰ and other factors that we may not be anticipating yet. Kuukpik nevertheless supports Alternative E but hopes stakeholders will continue to work together to incorporate adaptive mitigation and management strategies that can be applied to the analysis of BT2 and beyond.

D. Other Elements That Have Been Included in the Project

Kuukpik has also worked directly with ConocoPhillips and the North Slope Borough to incorporate operational requirements beyond those contained in BLM’s ROPs and lease stipulations. In particular, as part of the North Slope Borough rezone process, Kuukpik advocated for measures in addition to those proposed by the Borough that we believed would

²⁰ Willow MDP Draft SEIS (2022), Vol. 1, p. 263 (internal citations omitted):

Climate change has affected subsistence harvesting activities through changes in the timing of freeze-up and breakup, lack of ice and snow, the strength and frequency of storms and winds, reduced water levels and increased sedimentation in lakes and rivers, coastal and river erosion, changes in resource behavior including the timing and location of resource migrations, the health and abundance of subsistence resources, warmer temperatures which affect food processing and storage methods, and melting permafrost which affects access to ice cellars. Changes in snow, ice, and river conditions can affect residents’ ability to travel safely to subsistence harvesting areas at times when resources are available in those areas.

reduce impacts to caribou, the natural environment, and other resources, and provide mitigation or offsetting benefits to the community.²¹ Additional requirements contained in the NSB rezone ordinance include the following:

1. Required use of insulation to reduce road height and gravel use while protecting permafrost.
2. Development of a Good Neighbor Policy on caribou to assist hunters if caribou harvests are impacted by the project.
3. Reduced the airport runway length (from 6,200 feet to 5,700 feet)²² and received commitments not to use the largest and most disruptive cargo planes.
4. Development of vehicle and air traffic plans that would be designed to reduce impacts during sensitive periods (*e.g.*, caribou calving, bird nesting, and peak caribou subsistence activity), all to be updated regularly as needed.
5. Development of a plan to reduce diesel use associated with the Project (use of which should eventually be nearly eliminated when high line power becomes available).²³
6. Incorporation of the Willow Project into an Oil Spill Mitigation Fund Agreement.
7. Payments to an NSB-administered subsistence impact mitigation fund.
8. Consultations with the community regarding concurrent use and avoiding unreasonable interference with subsistence harvests or subsistence resources.
9. Carrying out various studies to track baseline environmental conditions and impacts over time and making this data available to the public.²⁴

²¹ See *id.*, p. 245 and Appx. E.14. Kuukpik’s copies of the Draft SEIS do not include the full text of the Rezone ordinance at Appendix E.14, which appears to be an inadvertent omission that should be corrected in the Final SEIS. In particular, we urge the inclusion of Exhibit 4 of that ordinance in the Final SEIS so that stakeholders can review the items that the Borough assembly adopted based on extensive input from Kuukpik board members. Note also that a future BT2 site is not covered by the current rezone ordinance. *Id.*, p. 245.

²² Compare Willow MDP FEIS (2020), Vol. 1, p. 13 and Willow MDP Draft SEIS (2022), Vol. 1, p. 14.

²³ Kuukpik will be encouraging Conoco to make progress integrating electric vehicles into its truck fleet to replace outdated diesel models. We understand Conoco has been studying the feasibility of electric vehicle use for many years, but as far as Kuukpik knows, little progress has been made. Specific requirements to use EV’s were rejected in the GMT2 ROD (Appx. C) on the basis that such vehicles were “not yet engineered to perform in Arctic conditions.” And while EV’s still may not be uniformly feasible in the coldest days of winter, nothing stands in the way of significant EV use in the summer and shoulder seasons. A group of 10 electric vehicles recently completed a drive all the way from Fairbanks to Oliktok Point (<https://www.arcticroadrally.com>). All the vehicles performed capably as far as Kuukpik knows. This helps demonstrate even more concretely that required use of electric vehicles should be part of the mitigation landscape, particularly in the summer and shoulder months when there is plenty of industry vehicle traffic in and around Nuiqsut, the Alpine field, and eventually Willow. Kuukpik intends to encourage Conoco to quickly phase in more electric vehicles across their Western North Slope operations, particularly closer to Nuiqsut where concerns about air quality are pervasive.

²⁴ NSB Rezone Ord., p. 31-33, Sec. 3.A.d and others.

10. Year-round use of subsistence representatives.

Although these elements are not as significant as the major design changes proposed in Alternative E, they are particularly valuable for another important reason: they were driven by the people of Nuiqsut. Over the course of several difficult days at the Borough Planning Commission and Assembly in December and January of 2020-21, Kuukpik and other representatives of Nuiqsut worked at a very local level to negotiate and insert these requirements into the Project because the community continued to have concerns that had not yet been adequately addressed. The specific and community-focused commitments in Exhibit 4 of the Rezone Ordinance will not only help reduce impacts from the Project, they represent real changes that the people of Nuiqsut effected on a Project over which many residents have felt they had little control. So even though these may not all seem like significant requirements from BLM's perspective, they are important because they are responses to very local concerns and affirmed the community's ability to influence the activities going on around it.

II. ANILCA 810 Determinations

The items listed above also reflect additional reasonable measures to reduce impacts to subsistence that have been incorporated into the proposed Project since the previous Record of Decision. Kuukpik has repeatedly emphasized BLM's earlier ANILCA 810 findings that Willow will likely cause reductions in availability of resources and limitations on access for Nuiqsut's subsistence users. We didn't focus on that point because we opposed the Project (which has never been Kuukpik's position), but merely to emphasize that BLM is obligated in light of its findings under ANILCA Section 810 to take additional steps to eliminate unnecessary impacts, decrease the size of the project to the "minimal" amount necessary to accomplish its purpose, and to take "reasonable steps" to minimize adverse impacts to subsistence uses and resources.²⁵

Our point throughout this process has been that Alternative B *didn't go far enough in fulfilling BLM's ANILCA 810 obligations* because it contained impacts that were reasonably

²⁵ See Willow MDP Draft SEIS (2022), Appx. G ANILCA Section 810 Analysis, p. 68:

ANILCA Section 810(a) provides that no "withdrawal, reservation, lease, permit, or other use, occupancy or disposition of the public lands which would significantly restrict subsistence uses shall be effected" until the federal agency makes the three determinations required by ANILCA Sections 810(a)(3)(A), (B), and (C). The three determinations that must be made are:

1. That such a significant restriction of subsistence use is necessary, consistent with sound management principles for the utilization of the public lands.
2. That the proposed activity will involve the minimal amount of public lands necessary to accomplish the purposes of such use, occupancy, or other such disposition.
3. That reasonable steps will be taken to minimize adverse impacts to subsistence uses and resources resulting from such actions.

avoidable (as proven by, for example, the now smaller airstrip and the consolidated drill sites, among other things). The other previous alternatives suffered the same problem because they deferred too much to Conoco’s proposed version of the project (particularly with respect to the proposed pad locations, which never meaningfully changed until Alternative E was developed) and failed to include more creative elements that, from Kuukpik’s perspective, were “reasonable”, would have “minimized” the amount of land needed for the project, and would have eliminated impacts that were not “necessary.”

But as a result of the changes, big and small, that have been introduced in Alternative E, this iteration of the Project is the first alternative that Kuukpik believes can support the findings that BLM is required to make under ANILCA 810. It bears repeating that there may be no version of the Willow Project that could avoid “significantly restricting” subsistence uses for Nuiqsut while still accessing a sufficient amount of the available oil, including Alternative E. But the measures that have been incorporated into Alternative E, in Kuukpik’s view, are generally “reasonable” when compared to the prior alternatives. This isn’t to say that Kuukpik still wouldn’t prefer a smaller project or less infrastructure or operational changes to reduce impacts (like a diesel pipeline all the way to project site).²⁶ But while we believe some such changes should also be considered “reasonable”, we acknowledge that Alternative E contains enough measures intended to minimize adverse impacts to subsistence that BLM can safely make the required determinations under ANILCA 810.²⁷

III. Mitigating Unavoidable Impacts

All that said, we urge BLM and all other cooperating agencies to consider creative options *now* to mitigate the unavoidable impacts that the Project, and oil and gas development

²⁶ An issue that hasn’t been discussed at much length is the need to consider developing a new landfill west of Nuiqsut, closer to the Willow Project than Deadhorse, in order to reduce the amount of waste material trucking that will be needed to support construction and operations at Willow. *See* NSB Willow Rezone Ord. (75-06-75), p. 24:

[T]he real issue at hand is the increasing distance from of the Deadhorse Regional Landfill and the need to create a new solid waste disposal facility closer to the new oil developments that are occurring and will continue to the West of the Colville River. The disposal methods that were used in the early days of Alpine are too limited to address the growing solid waste disposal needs of this region of the North Slope and as such, CPAI needs to engage the NSB and BLM on developing a regional solid waste solution for the Greater Colville area.

Kuukpik agrees with the proposal to explore options for a western North Slope landfill. As a major landowner in the area, we would also expect to participate in those discussions.

²⁷ One of the most important mitigation measures is the requirement to construct all new pipelines at a minimum elevation of 7 feet. BLM heard from many Nuiqsut residents who believe the 5-foot pipelines associated with Meltwater have been a primary cause of caribou deflection away from Nuiqsut. It is imperative that the 7-foot requirement be maintained and enforced throughout the entire Willow Project Area.

generally, will have on subsistence and Nuiqsut. The past two decades have seen a patchwork and inconsistent approach to managing the NPR-A. The use of NPR-A Integrated Activity Plans was intended to create a more durable planning and management strategy for the entire region but has only been marginally successful because each new Presidential administration has tossed out their predecessor's IAP in favor of one that advances their own priorities and agenda. Kuukpik therefore urges BLM to consider some larger scale mitigation measures that could permanently institutionalize certain management priorities and strategies into the decades long effort to balance subsistence and development on the North Slope.²⁸

A. Teshekpuk Lake and the critical areas around it deserve permanent protection.

It is time to find a way to permanently protect Teshekpuk Lake, a buffer around the lake, and the migration corridors to the east and northwest. These are the areas of the TLSA and TLCHA that are of most importance to maternal and migrating caribou of the Teshekpuk Caribou Herd – the herd that will be most impacted by Willow. These areas are so critical to the long-term health and survival of the herd that leasing and most non-subsistence surface activities were categorically prohibited in the area under the 2013 NPR-A IAP. Even the 2020 NPR-A IAP provided these areas with *some* surface protection, but these protections were subject to significant exceptions and always left open the option for a pipeline or road if it were deemed “essential”.²⁹ Even though the 2022 IAP ROD reinstated protective measures in these areas, the very fact that protections have changed twice so radically in a two year period demonstrates the need for a long-term, durable plan to protect these critical areas. In light of the impacts that the Teshekpuk Herd is likely to experience in the coming decade, opening this area to leasing and surface development whenever there is a change in administration does not provide the kind of long-term protection the herd---and the subsistence communities that depend on it---need in order to thrive.

Kuukpik therefore encourages BLM and Secretary Haaland to explore several options. First, although Kuukpik has never supported wilderness designation in NPR-A before, we would consider supporting such a designation if it were confined to the surface area of Teshekpuk Lake, a buffer along all shores of Lake, and the K-10 Caribou Movement Corridors/K-16 Deferral

²⁸ The NPRPA authorizes expansive mitigation measures related to oil and gas, directing the Secretary to “include or provide for such conditions, restrictions, and prohibitions as the Secretary deems necessary or appropriate to mitigate reasonably foreseeable and significantly adverse effects on the surface resources of the National Petroleum Reserve in Alaska” (42 USC § 6506a(b)). BLM has catalogued additional sources for this authority at GMT1 ROD, pp. 5, 14, and Appendix D, p. 58. So even though BLM may not be able to require or accomplish these proposals strictly within the context of a Willow Record of Decision, BLM has sufficient legal authority to support initiating these processes through other means, such as recommendations to the Secretary, Congress, or the President, for example, or requirements for future studies, creation of working groups, *etc.*

²⁹ See ROP's K-2 (surface occupancy restrictions for deep water lakes), K-6 and K-7 (relating to goose protection), K-9 and K-10 (surface protections for the Teshekpuk Lake Caribou Movement Corridor)

Areas (under the 2020 Alternative E). Although Kuukpik generally supports more adaptive management tools than the blunt instrument of wilderness designation, we can foresee no scenario in which development of surface facilities in the lakebed itself or the calving areas surrounding it would be justified. Likewise, there is no reason to leave open development options in the most sensitive migration corridors based on a hypothetical (and seemingly increasingly remote) possibility that an offshore pipeline will be needed sometime in the foreseeable future, much less the even more speculative notion that it must come on shore in this area.

Questions regarding wilderness designations were considered at some length during the 2008 and 2012 IAP processes.³⁰ The analysis of wilderness characteristics in the areas around Teshekpuk Lake strongly suggests that the area was, and should be, considered for this highest level of surface protection.³¹ In fact, the Obama administration appeared poised to move some portion of the Teshekpuk Lake Special Area at least towards permanent protection at that time, but was prevented from doing so by Congress.³²

Certainly the same thing may happen this time. Kuukpik understands that the Secretary cannot accomplish this goal by herself, or that gathering Congressional support for the most durable types of protections will be simple.³³ But the Secretary has discretionary authority to recommend wilderness designations to Congress, which would initiate a process and plan for advancing this concept for further consideration, at a minimum.³⁴ Given the national attention currently focused on development in the Arctic, there may be political appetite for such a designation.

Federal designation beyond the current “Special Area” may be the only way the current administration can protect Teshekpuk Lake and these critical migration corridors in a way that

³⁰ See, in particular, 2012-13 NPR-A IAP Final EIS, Vol. 1, pp. 449 – 458 describing the historical record on wilderness analysis in NPR-A.

³¹ *Id.*, p. 457.

³² See Secretarial Order 3310 and 3393.

³³ We note that there are other options that could provide significant protection to the area if certain requirements are satisfied, such as National Monument, National Conservation Area, National Wildlife Refuge, and National Preserve designations. Some of these can be accomplished (or partly accomplished) without Congressional action. But any action that can be taken without Congressional action can also be undone or limited by future administrations. Congressional action in some form is therefore likely required to achieve the kind of permanent protection that Kuukpik is interested in exploring.

³⁴ The NPR-A is exempt from the more standard procedural path for wilderness designations (FLPMA section 603 (43 USC 1782)), but ANILCA Section 1320 (43 USC 1784) grants the Secretary discretionary authority to “identify areas in Alaska which he determines are suitable as wilderness” and states that the Secretary “may, from time to time, make recommendations to the Congress for inclusion of any such areas in the National Wilderness Preservation System.”

cannot simply be undone after a presidential election. Kuukpik is thus willing to consider supporting permanent designation of these vital caribou habitat and migration corridors despite our normal reluctance to embrace such restrictive measures being imposed from outside.

B. Local management of caribou

We now turn to something at the opposite end of the philosophical spectrum from having decisions regarding the NPR-A made in Washington D.C. As BLM knows, the management of fish and game with respect to subsistence has long been mired in the conflicting policies of the state and federal governments. This creates uncertainty and a lack of uniformity regarding caribou management, which of course migrate long distances without regard to lines on a map. There is also no single agency with decision making authority across these invisible boundaries, or which can respond to evolving data and local concerns efficiently. The result is that many of the decisions that primarily affect local Alaska Native residents on the North Slope are being made by outsiders, not locals---locals with generations of experience making their own decisions and managing subsistence resources for the long-term benefit of the community.

Kuukpik therefore urges BLM and other federal agencies to begin working with stakeholders to establish an Alaska Eskimo Caribou Commission. The Commission would perform generally the same type of information gathering, policy setting, and management functions as are currently performed on the North Slope for other important species and resources (*e.g.*, the Alaska Eskimo Whaling Commission, Alaska Beluga Whale Committee, Eskimo Walrus Commission, and the Alaska Nannut Co-Management Council). Nearly all stakeholders on the North Slope are familiar with at least some of these entities, which should contribute to local “buy in” for a Caribou Commission. In fact, several of these organizations, such as the AEW, have become high profile, gold standard examples of successful collaborative subsistence resource management. The success of these organizations demonstrates the potential for a Caribou Commission to meaningfully contribute to the effort to ensure that subsistence users are involved in the decisions that affect them more than anyone else.

The goal of the proposed Alaska Eskimo Caribou Commission is to establish a body that can collect data and traditional knowledge regarding caribou on the North Slope and make decisions based on that analysis that will help ensure the long-term health of these important subsistence resources. The NSB Department of Wildlife Management could be responsible for data gathering and analysis. Each commissioner would have special expertise in subsistence practices and needs regarding caribou on the North Slope. As with the AEW (and other bodies), the Commission would have the ability to take certain actions to protect caribou herds if the herds appeared to be declining or threatened. Management powers might include setting priority uses or users for a period of time, limiting or closing certain areas to hunting, or limiting certain activities in highly sensitive areas or seasons (such as calving season). The visible success of AEW carrying out these functions on behalf of the whaling community and NOAA

demonstrates how well such a program can function if it is empowered and given the right tools to succeed.

Caribou management would be particularly well-suited to this type of cooperative management because, like whales (and other marine mammals that are currently co-managed by the federal government and the subsistence community), caribou are a highly migratory species that sustain multiple communities and are affected by very different impacts over a wide area. Attempting to manage caribou based on land ownership and competing federal and state policies and regulations simply does not make sense because impacts on one side of an arbitrary boundary may greatly affect the population of caribou that move across the entire region. By including knowledgeable representatives from the communities that would be impacted by changes to the various herds, each community would have a meaningful voice in the management process.

This proposal is consistent with the cooperative management or co-management arrangements that are encouraged in Secretarial Order 3342, Joint Secretarial Order 3403, and elsewhere. One of the benefits to such an arrangement would be to introduce more local control into a process that mostly affects local residents. The Commission would be a federally approved and empowered body comprised of North Slope representatives that functions on a peer-to-peer level with other responsible agencies regarding certain decision-making responsibilities. Such an arrangement would be a powerful symbol and tool for subsistence communities throughout the region.

The other most important benefit would be that the Commission would operate continuously, with a mission to ensure the long-term survival of caribou across the entire North Slope, not just influencing elements of individual projects as they are proposed. Unlike the NEPA and other discrete permitting processes, the Commission's mission and process would not focus on any specific project or proposed project. Although there would undoubtedly be some Commission involvement in proposed development projects, its primary role would be monitoring the overall long-term health of the caribou herds and making decisions that either avoid problems before they start or attempt to address issues as they arise. This sets the Alaska Eskimo Caribou Commission apart from the other public processes that exist today, which are constrained by the fact that they are typically focused narrowly on a specific project, plan, or proposal, and by the fact that the process is essentially over after a project is approved and permitted. The Commission's ability to act in ways that are not related to a specific project proposal or timeline would make it a valuable tool in the effort to protect one of the North Slope's most important subsistence resources for all time.

C. Mitigate impacts on communities in the NPR-A through economic and community planning efforts.

Kuukpik also encourages BLM to consider larger scale efforts to mitigate “residual” or unavoidable impacts caused by the Willow Project and others.³⁵ BLM noted in 2018 that a NEPA analysis should include a description of

[T]he residual effects of any adverse impacts that remain after mitigation measures have been applied....Residual impacts are those impacts that remain after all reasonable efforts are made to avoid, minimize, rectify, and reduce or eliminate impacts over time. Mitigation stipulations, which may include any combination of elements from the mitigation hierarchy, are unique for each approved development project, and are specified as a part of the decision that follows NEPA analysis.³⁶

Based on this requirement, BLM catalogued unavoidable impacts that GMT1 was expected to cause, including impacts to the natural environment and impacts to local culture due to adverse consequences on local subsistence practices.³⁷ According to BLM, these unavoidable impacts supported the need for BLM to explore additional measures that could be taken, outside the scope of the project itself, to offset unavoidable impacts.³⁸ The result was a requirement that Conoco contribute money to establish a compensatory mitigation fund, which eventually led to development of a regional mitigation strategy for the Northeastern NPR-A and some funding for projects in Nuiqsut that, while well-intentioned, have achieved varying levels of success.

We raise this issue now not because we recommend reviving the RMS specifically or more contributions to a compensatory mitigation fund. Rather, we raise it to emphasize the authority BLM has to attempt to address Willow’s unavoidable impacts at a larger scale, particularly in light of the unavoidable cumulative impacts Nuiqsut currently faces. The Draft SEIS notes numerous unavoidable impacts that, under the rationale articulated above, would

³⁵ The Final Regional Mitigation Strategy for Northeastern NPR-A (August 2018), pp. 3-5, describes the rationale for this type of analysis and supports the BLM’s legal authority to engage in this type of economic planning and mitigation to offset socio-economic and socio-cultural impacts from development on BLM-managed lands. To be clear, Kuukpik is not suggesting the RMS be revived precisely in its previous form. But we do think the concept of far reaching, out-of-kind mitigation and planning efforts has value and is legally within BLM’s authority, as the RMS explains.

³⁶ *Id.*, p. 4.

³⁷ *Id.*, p. 5. “The mitigation specified in the ROD included supplemental BMPs to be executed on-site, and compensatory mitigation designed to offset residual impacts to the natural environment of the Fish Creek and Tinmiaqsigvik (Ublutuoch) River setbacks and the cultural practices of the Iñupiat people that would be potentially affected by the GMT1 development.”

³⁸ The NPRPA provides BLM with additional mitigation authority specific to oil and gas operations in the NPR-A, directing the Secretary to “include or provide for such conditions, restrictions, and prohibitions as the Secretary deems necessary or appropriate to mitigate reasonably foreseeable and significantly adverse effects on the surface resources of the National Petroleum Reserve in Alaska....” (42 USC § 6506a(b)).

support additional efforts to improve the lives of affected local residents. We urge BLM to think creatively about ways to do exactly that.

In particular, Kuukpik urges BLM to explore ideas for expanding economic opportunities for North Slope residents. Better economic opportunities can help offset unavoidable financial impacts associated with development (such as increased hunting costs).³⁹ Furthermore, developing successful talent and small businesses can mitigate the negative psychological and socio-economic impacts that many residents are experiencing because of lost subsistence opportunities or traditions, conflict in the community, and other factors.⁴⁰ It is therefore appropriate to consider economic development opportunities as mitigation (or compensatory mitigation) in the context of specific development projects and for BLM’s larger and ongoing planning efforts in the NPR-A.

We certainly recognize that economic development efforts are harder to define and implement than other projects that have been put forward as compensatory mitigation. But the challenge shouldn’t stop us from exploring possibilities.⁴¹ It’s hard to look at indigenous economic development programs occurring in Southeast Alaska and with some Canadian First Nations and not wonder what the possibilities are for Nuiqsut and the North Slope. Just like young people elsewhere, Kuukpik’s shareholders and residents are interested in opportunities that are perceived to be modern and sustainable. This means looking beyond typical oilfield jobs and trying to foster small businesses and opportunities that are more consistent with Nuiqsut and Inupiat culture. With some programmatic guidance and support, Kuukpik believes many North Slope communities, and Nuiqsut in particular, could develop the kind of innovative, indigenous-led, sustainable economies---rooted in small businesses and our cultural connections to the land base around Nuiqsut---that are developing elsewhere. We look forward to working with BLM to explore these possibilities.

Conclusion

³⁹ See Willow MDP Draft SEIS (2022), Vol. 1, p. 286:

A recent economic study on subsistence impacts (Northern Economics Inc. 2019) analyzed the potential economic impacts of several different scenarios resulting from development of GMT-1. The study found that if the GMT-1 project results in residents having to travel 20 miles farther to harvest caribou, the economic impacts could be substantial, at an increase of more than \$45,000 in harvest costs. If, instead, residents increase their use of trucks and roads to hunt for caribou, residents would likely see a decrease in harvests costs of more than \$13,000.

⁴⁰ Willow MDP Draft SEIS (2022), Vol. 1, p. 304.

⁴¹ The reality is that some of the “traditional” compensatory mitigation projects, like the proposed Nuiqsut Piuraagvik, have ended up being fairly challenging to execute as well, despite best intentions on all sides. And while Kuukpik continues to support those projects (and in fact has supported the effort to advance the Piuraagvik in numerous ways), none of them have been a rousing success so far.

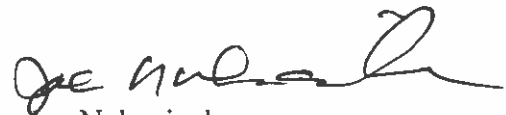
We want to thank BLM staff for their hard work during this long and challenging process. Kuukpik has not agreed with every decision that has been made along the way, but to a person, every BLM staff member that Kuukpik has worked with during this effort has been professional, helpful, and engaged in the process. We appreciate that.

Kuukpik has worked very hard for many years to try to develop a version of the Willow Project that we could support. BLM's new Alternative E accomplishes that. Kuukpik would therefore like to see it carried forward as the Preferred Alternative. But we urge BLM not to stop there and to work with us and other stakeholders to generate durable plans and policies to ensure the long-term health of Nuiqsut. Kuukpik will continue to do everything in our power to achieve that goal as well.

Sincerely,

KUUKPIK CORPORATION

By:



Joe Nukapigak
President

cc: Kuukpik Board of Directors
City of Nuiqsut
Native Village of Nuiqsut

Labor Letters of Support



LIUNA!

August 26, 2022

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Ms. Stephanie Rice
Project Lead
Alaska State Office
Bureau of Land Management
222 West Seventh Avenue, #13
Anchorage, Alaska 99513

RE: Willow Master Development Plan
for the Supplemental Draft Environmental Impact Statement

Dear Ms. Rice:

On behalf of the 500,000 members of the Laborers' International Union of North America (LIUNA), I submit the following comments in response to the Supplemental Draft Environmental Impact Statement (SEIS) for the Willow Master Development Plan (MDP). LIUNA applauds the Bureau of Land Management for completing this SEIS, as it is an important and necessary step for Willow MDP to move closer to the project's construction phase and put LIUNA members to work. LIUNA supports the Willow MDP because of what it means for our nation's energy independence, local and state economies, and, most importantly, what it means for the hard-working LIUNA members in Alaska.

LIUNA members work throughout North America, predominantly within the construction industry. From highways and bridges, to tunnels and skyscrapers, our members work every day, building America. One sector, in particular, that has provided substantial workhours for our members is our nation's energy industry. Specifically, our oil and natural gas infrastructure. The oil and natural gas industry has employed thousands of laborers, which has led to tens of millions of construction workhours for LIUNA members.

Because construction jobs are inherently temporary by nature, LIUNA members must move from job to job, banding together project after project to create construction careers. As noted in the SEIS, Willow MDP can employ over 1,000 construction workers yearly for the roughly 7 years it will take to construct. This will result in millions of work hours for LIUNA members. These are good union jobs with family-supporting wages and benefits.

Feel the Power

Ms. Stephanie Rice
August 26, 2022
Page Two

The work required for the construction of Willow MDP is work that our members are already trained to do. Infrastructure such as gravel and ice roadways, bridges, several hundred miles of pipelines, and the construction of airstrips and mine sites. Union apprenticeship training programs provide our workers with the best, high-skilled training within the construction industry. Combined with decades of experience, our workforce is second to none. This helps ensure that Willow MDP will be built correctly, on time, on budget, and with the least environmental impact. Developing Willow MDP is essential for our nation's national security and global competitiveness within the energy industry. Producing domestic energy supports American jobs while reducing the need to import from foreign countries.

ConocoPhillips completed its first Environmental Impact Statement (EIS) in 2020. Alternative B was the desired decision. There was, however, strong pushback due to environmental and habitat concerns. That concern led a federal judge to ultimately void the project's necessary permits in 2021, which triggered ConocoPhillips to conduct a second EIS. The 2022 SEIS added a new alternative, Alternative E, which addresses these issues. Alternative E downsizes the number of drill pads from five to three. In addition, it reduces the total area needed for surface infrastructure, thereby decreasing the amount of gravel, freshwater, and wetlands necessary for the project. Alternative E also relocates Bear Tooth drill site 5 (BT5), addressing potential environmental impacts with respect to wildlife.

On behalf of our members in Alaska and across North America, I thank the Bureau of Land Management for the opportunity to comment on this important project and for their hard work on this SEIS. LIUNA supports the Willow MDP and asks that BLM approve the Supplemental EIS and Record of Decision (ROD). Time is imperative, not only for the project itself, as its construction must be performed in the winter months, but also for LIUNA members who are waiting and, hoping, to go to work constructing Willow MDP.

With kind regards, I am

Fraternally yours,



TERRY O'SULLIVAN
General President

bks
Attachment



LIUNA!

July 27, 2022

TERRY O'SULLIVAN
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General Secretary-Treasurer

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The Honorable Deb Haaland
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Ms. Stephanie Rice, Project Lead
Alaska State Office
Bureau of Land Management (BLM)
222 West Seventh Avenue – Mailstop 13
Anchorage, Alaska 99513

RE: Opposing Extension of 45-Day Comment Period for Willow Supplemental Draft
Environmental Impact Statement

Dear Secretary Haaland and Project Lead Rice:

The Laborers' International Union of North America (LIUNA) is a diverse union representing nearly half a million members, most of whom work in the construction industry. LIUNA construction members work on a vast array of both privately and publicly funded infrastructure projects. Some examples include highways, roads, bridges, and tunnels; energy generation and distribution systems, natural gas pipelines, wind farms and solar panel fields, water and clean air works, environmental remediation, and buildings of all types. All of this, however, is put in jeopardy as our nation's critical infrastructure continues to be put under constant restraint brought on by costly, burdensome, and often unnecessary delays. I am writing to request that you do not extend the current 45-day comment period for the Supplemental Draft Environmental Impact Statement (SEIS) for Alaska's Willow project, and allow the process to continue to move forward.

Our members move from to job to job, project to project, gaining skills and experience that build construction careers and job prosperity. There is not an area of the construction sector that our members do not work in. This is especially true with respect to our nation's vast energy infrastructure sector. In fact, energy infrastructure, oil and natural gas in particular, is the largest privately funded job creating sector for LIUNA construction workers. The oil and natural gas industry has provided tens of thousands of jobs, resulting in millions of work hours for our members. These are quality union jobs, with family supporting wages and benefits. The same is true for the Willow project, and the jobs the project will generate.

Feel the Power



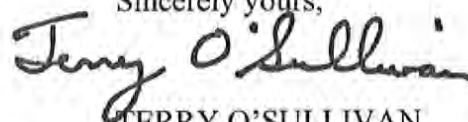
Alaska's Willow project
July 27, 2022
Page 2

Construction of the Willow project includes ice roads, pipelines and infield flowlines, gravel roads, pads and airstrips, and bridges. Given the nature of the work, construction can only be done during winter months. For that reason, the timing of Willow's construction is critical to its completion.

It is important to note that the current 45-day comment period is one of several comment periods that have transpired over the course of the proposed project. In reality, stakeholders have had multiple chances to submit comments, with a combined total of over 200 comment days and 25 public meetings. Therefore, the request to extend the current 45-day comment period by project opponents appears to merely be a tactical maneuver to exhaust more private capital by causing needless delays, as it would force the project to forgo the 2023 winter construction season, with the ultimate goal of upending the project altogether.

Permitting delays have become the norm within the construction industry. This only results in hindered job growth and forgone economic benefits. It is something that our members are all too familiar with, as we bear the brunt of these calculated assaults. For a LIUNA member, every day a project is delayed, is another day without a paycheck. It is another day without healthcare and pension contributions. The Willow project has had sufficient public engagement throughout its approval process and accordingly, the 45-day comment period for the Willow SEIS is adequate. We urge the Department to not extend the comment period time.

With kind regards, I am

Sincerely yours,

TERRY O'SULLIVAN
General President

jmm



August 3, 2022

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President

Brent Booker
Secretary-Treasurer

Newton B. Jones
Boilermakers

Terry O'Sullivan
LIUNA

Frank J. Christensen
Elevator Constructors

James T. Callahan
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Gregory T. Revard
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James Williams Jr.
Painters and Allied Trades

James A. Hadel
Roofers

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Teamsters

The Honorable Deb Haaland
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U.S. Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Ms. Stephanie Rice, Project Lead
Alaska State Office
Bureau of Land Management (BLM)
222 West Seventh Avenue – Mailstop 13
Anchorage, Alaska 99513

Dear Secretary Haaland and Project Lead Rice:

On behalf of North America's Building Trades Unions (NABTU), its fourteen affiliated national and international unions, and the over 3 million construction industry employees we represent, I write to express our strong support for the Willow Project in Alaska and to state our opposition to any extension to the comment period for the recently released draft supplemental environmental impact statement (DSEIS).

After five public comment periods, 25 public meetings and hundreds of days for public comment, we request that the Bureau of Land Management (BLM) deny any request to further extend the comment period for the DSEIS. By approving such an extension all that would be gained is further delay in providing thousands of middleclass sustaining jobs to our members, and communities in Alaska. These requests for delay are not intended to yield substantially new information, as such has already been offered in the years since this project's announcement. They are instead intended to delay the project another winter construction period or worse delay the project to where it is no longer economically viable to proceed.

With the winter construction period rapidly approaching an extension of the comment period in any manner means our members, the working men and women of the construction industry, will be effectively blocked from receiving the good wages, benefits, and career experience offered by Willow for another calendar year.

Thank you for your consideration of this letter and your continued thoughtful approach to the Willow Project which will directly benefit our members in Alaska.

Sincerely,

Sean McGarvey
President



International Union of Operating Engineers

AFFILIATED WITH THE AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS

May 4, 2020

Willow MDP/SDEIS Comments
Bureau of Land Management Alaska State Office
c/o Racheal Jones, Project Manager
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GENERAL COUNSEL

MATTHEW G. MCGUIRE

RE: Support for Preferred Alternative B and Module Transfer Option 3, Supplemental to the Draft Environmental Impact Statement for the Willow Master Development Plan

The International Union of Operating Engineers respectfully submits the following comments in support of the Preferred Alternative B and Module Transfer Option 3 in the Supplemental to the Draft Environmental Impact Statement for the Willow Master Development Plan (MDP).

The International Union of Operating Engineers (IUOE) is one of North America's leading construction unions, representing over 400,000 hardworking men and women in the United States and Canada. Most members of the IUOE work in the construction sector, operating and maintaining heavy equipment. Thousands of IUOE members possess specialized training and years of practical experience building the nation's energy infrastructure that powers our country, including such notable projects as the Hoover Dam, the Trans-Alaska Pipeline, and countless power plants and pipelines.

The proposed \$5-\$6 billion Willow Project, a stand-alone development in the Bear Tooth Unit in the National Petroleum Reserve-Alaska (NPR-A), reliably and responsibly delivers American energy and job opportunities. The Project would provide significant employment opportunities to members of the Operating Engineers and other skilled trades and will bring critical revenue and jobs to Alaska and the nation, helping us recover from the devastating economic impacts of the COVID-19 pandemic. The Willow Project could create more than 2,000 construction jobs, plus 300 permanent jobs and generate more than \$10 billion in federal, state and North Slope Borough revenue. Overall, the project will exceed 7 million manhours, with construction expected to last over five years.

BLM's current public comment period should not be paused or extended because projects like Willow are critical to Alaska's economic recovery. The State of Alaska, Department of Natural Resources, provided a letter to BLM on April 3, 2020 which says: "This project will bring critical revenue and jobs to the State and the nation during an essential time." Alaska relies heavily on revenue from North Slope oil production, which has, generally speaking, seen a steady decline in production since its peak in 1988. The Project would help offset declines in production from North Slope oil fields - BLM estimates peak production of 130,000 barrels of oil per day and approximately yield 590 million barrels of oil over the Project's 30-year life.



Production from Willow would serve to help maintain the integrity of the Trans-Alaskan Pipeline System (TAPS), a critical link to America's energy distribution. Given the vast resources believed to be available in the NPR-A, future production could reverse the decline in TAPS, allowing it to remain viable for decades. Prohibiting development and production at Willow would set a dangerous precedent for future development in NPR-A, severely compromising the long-term energy and economic security of Alaska and the nation.

In response to stakeholder concerns and public comments on the Willow Master Development Plan Draft IES (DEIS) released in August 2019, ConocoPhillips submitted an updated project proposal that includes significant changes. The new proposal includes a third module transfer option, construction of a freshwater reservoir, and up to three boat ramps for subsistence use. The Module Option 3 would allow for delivery of the heavier module first to Oliktok Dock, then using existing gravel roads and land-based ice roads for transporting modules to the site of the Willow Central Facility. This makes a temporary gravel island no longer necessary.

The Willow MDP is consistent with the BLM's issued Integrated Activity Plan (IAP) for the NPR-A and complies with all of its obligations under the National Environmental Policy Act. The proposed Project minimizes environmental impacts and maintains high standards for safety and emergency response.

ConocoPhillips employs rigorous standards to protect the environment and subsistence resources. They have an excellent track record and long history of operating responsibly and working with stakeholders on the North Slope and in the Arctic. Alternative B reflects feedback that ConocoPhillips received from North Slope stakeholders and demonstrates its willingness to work with communities to minimize the impact of the project. Alternative B would also reduce environmental impacts compared to other alternatives by using less gravel fill, fresh water, and aircraft flights, while improving year-round access for local residents.

Extensive mitigation and engineering design features are incorporated into the Willow project. For instance, pipelines will be elevated to at least 7 feet and separated from roads to allow for caribou movements. Extended reach drilling technology has decreased the size of drill site pads by 15-20 percent, dramatically reducing the footprint in the North Slope. Spacing considerations in road and pipeline construction facilitates caribou movement minimizing disturbance to vulnerable wildlife. The DEIS references over 270 mitigation efforts and concludes, in section 3.19, that the cumulative effects of the project will not have a significant impact on the natural and human environment.

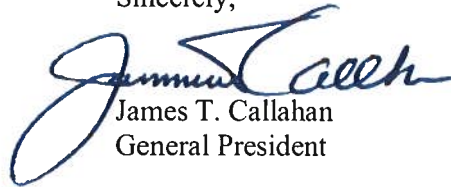
Since the construction of the Alpine facility in the North Slope, subsistence harvests of all key resources in Nuiqsut have remained strong. Caribou harvest have exceeded the average over the past few years since the construction of the CD5 drill site, Greater Mooses Tooth 1 (GMT1), and Greater Mooses Tooth 2 (GMT2). Nuiqaut hunters are increasingly using roads to hunt year-round. Harvest numbers are increasing around infrastructure, which is a good indicator that caribou are not avoiding the infrastructure area.

The Willow Project will not have a significant impact on the environment, and it will maintain high standards for safety. This project will also put many Operating Engineers to work, along with others in the skilled trades. These jobs pay family-sustaining wages and offer strong health and pension benefits. Furthermore, construction of this project will provide much needed revenue to Alaska and the North Slope community.

The IUOE strongly encourages the Bureau of Land Management to approve the Preferred Alternative B and Module Transfer Option 3, Supplemental to the Draft Environmental Impact Statement for the Willow Master Development Plan.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "James T. Callahan". The signature is stylized with a large initial "J" and a long horizontal stroke.

James T. Callahan
General President

ALASKA AFL-CIO

3333 Denali Street, Suite 125 · Anchorage, Alaska 99503 · 907-258-6284

JOELLE HALL
Executive President



JAKE METCALFE
Secretary / Treasurer

March 8, 2021

Department of the Interior

1849 C St NW MS 5311

Washington DC 20240

The Honorable Secretary Haaland

First, congratulations on your historic nomination and thank you for your willingness to serve and to grapple with this challenging policy area that affects every American.

We know that the challenge of balancing the future and the past is especially present in your department. There is no doubt that we must confront our changing environment, but we also must be mindful to transition in a way that is fair to workers, stakeholders and to the environment. It is with the thoughts of an intentional transition that we urge the Department of Interior to allow the Willow Project in the National Petroleum Reserve-Alaska (NPR-A) to proceed with the currently issued Environmental Impact Statement (EIS) Record of Decision (ROD). We are dismayed about reports that the Department intends to review current Environmental Impact Statements and RODs with the potential to review the EIS ROD for the Willow Project, causing harmful delay for a project that has incorporated the best mitigation practices available.

The Willow Project was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan (IAP) under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over 2 years. There were multiple rounds of public comment and public meetings; numerous meetings between the agencies and ConocoPhillips; over 100 public meetings involving Alaska Native stakeholders; and multiple significant revisions to the project to respond to suggestions and concerns from the Alaska Native community. The project is subject to over 270 mitigation measures and best practices from the 2013 Integrated Activity Plan. In addition, the Willow Project involves many proactive mitigations by ConocoPhillips. Specifically, the Willow Project has focused on lowering emissions and powering drilling rigs electrically once facilities are installed as well as increasing energy efficiency over traditional installations on the North Slope. During the North Slope Borough Rezoning Process, there were additional mitigations incorporated in the project. These include using foam insulation in roads to reduce road height and gravel quantities. The airport footprint was reduced along with adding restrictions for traffic and airport plans. There is also an extended and expanded oil spill mitigation agreement. In addition to the in-depth mitigation measures of the Willow project, hallmarks of the project planning have been community involvement, stewardship, and respect for subsistence and caribou.

This project has met all regulatory requirements in addition to working with local residents to further reduce impacts, and many are relying on the benefits it brings. The Department should

not create last minute unnecessary delays and obstacles, but should allow the Willow Project to move forward as permitted and planned.

The economic benefits will be immense, and Alaska has never needed these gains more than now. Alaska's economy was first hit with a crash in oil prices followed by the ravages of the pandemic. By any measure, Alaska workers and their families are hurting. Our state budget is reaching an unprecedented crisis, and unemployment levels reflect the ongoing impacts of the pandemic on our jobs and local businesses. These challenging conditions are hitting Alaskans while they are already on economically precarious footing, and the Willow Project has the opportunity to both jumpstart our economy with jobs and be a model in community and environmental stewardship. To highlight a few of the many economic benefits of the Willow Project, the project would generate over 2,000 construction jobs and hundreds of long-term jobs. Consistent with the Administration's goals to increase middle-class union jobs, 75% of anticipated total North Slope installation work hours would be union labor. Again, the Willow Project gives us the opportunity for the Administration to work with unions to help set records with labor-management apprenticeship hours, workplace safety, and stewardship. In addition to an influx of much-needed jobs, according to BLM estimates, the Willow Project will generate \$2.3 billion in revenue for the State of Alaska; \$7.6 billion in federal royalties, income taxes and gravel sales; and \$1.2 billion in revenues for the North Slope Borough.

The need for fossil fuels will be with us for quite some time to come. Alaska has proven itself to be a safe place to produce, has a track record of middle-class wages that support a family, and this responsible development has provided funding to our state government and the services needed by our citizens. Willow is a project that can help us bridge the gap and together we can build a just transition for our planet and our workforce. I urge you to support the current Record of Decision and allow the Willow project to move forward as planned and previously approved.

Sincerely,



Joelle Hall

Cc: Senator Lisa Murkowski
Senator Dan Sullivan
Congressman Don Young
Ben Stevens
President Richard Trumka



ALASKA PETROLEUM JOINT CRAFTS COUNCIL

2501 Commercial Dr.
Anchorage, Alaska 99501
(907) 341-0341

A.J. "Joey" Merrick II - President
Bob Hubbard - Vice-President
James McMilon - Secretary-Treasurer



February 6, 2021

The Honorable Deb Haaland
Secretary Nominee
The Department of Interior
1849 C Street, N.W.
Washington, D.C. 20240

Subject: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Nominee Haaland:

As labor organizations representing workers in the oil and gas industry in Alaska, representing 19,800 workers, we urge the Department of Interior to allow the Willow Project in the National Petroleum Reserve-Alaska (NPR-A) to proceed with the currently issued Environmental Impact Statement (EIS) Record of Decision (ROD). We are disappointed about reports that the Department intends to review current Environmental Impact Statements and RODs with the potential to review the EIS ROD for the Willow Project, causing harmful delay for a project that has incorporated the best mitigation practices available.

The Alaska Petroleum Joint Crafts Council (APJCC) represents the Alaska workers who maintain critical energy infrastructure of national importance from the North Slope to the Valdez Marine Terminal. Through our exceptional training programs and adapting with improving technology, we have achieved exceptional safety and environmental records while skillfully executing significant projects under challenging conditions. We appreciate President Biden's plan to "Build Back Better" and incorporate clean energy into our country's energy plan. At the same time, the transition must include family-supporting jobs and maintain environmentally responsible projects like the Willow project to ensure the economic health of Alaska and our communities.

The Willow Project was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan (IAP) under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over 2 years. There were multiple rounds of public comment and public meetings; numerous meetings between the

International Brotherhood of Teamsters
Local 959

Laborers' International Union of North America
Locals 942 and 341 - District Council

International Union of Operating Engineers
Local 302

United Association of Plumbers and Steamfitters
Locals 375 and 367

International Brotherhood of Electrical Workers
Local 1547

agencies and ConocoPhillips; over 100 public meetings involving Alaska Native stakeholders; and multiple significant revisions to the project to respond to suggestions and concerns from the Alaska Native community. The project is subject to over 270 mitigation measures and best practices from the 2013 Integrated Activity Plan. In addition, the Willow Project involves many proactive mitigations by ConocoPhillips. Specifically, the Willow Project has focused on lowering emissions and powering drilling rigs electrically once facilities are installed as well as increasing energy efficiency over traditional installations on the North Slope. During the North Slope Borough Rezoning Process, there were additional mitigations incorporated in the project. These include using foam insulation in roads to reduce road height and gravel quantities. The airport footprint was reduced along with adding restrictions for traffic and airport plans. There is also an extended and expanded oil spill mitigation agreement. In addition to the in-depth mitigation measures of the Willow project, hallmarks of the project planning have been community involvement, stewardship, and respect for subsistence and caribou.

This project has met all regulatory requirements in addition to working with local residents to further reduce impacts, and many are relying on the benefits it brings. The Department should not create last minute unnecessary delays and obstacles, but should allow the Willow Project to move forward as permitted and planned.. The economic benefits will be immense, and Alaska has never needed these gains more than now. Alaska's economy was first hit with a crash in oil prices followed by the ravages of the pandemic. By any measure, Alaska workers and their families are hurting. Our state budget is reaching an unprecedented crisis, and unemployment levels reflect the ongoing impacts of the pandemic on our jobs and local businesses. These challenging conditions are hitting Alaskans while they are already on economically precarious footing, and the Willow Project has the opportunity to both jumpstart our economy with jobs and be a model in community and environmental stewardship. To highlight a few of the many economic benefits of the Willow Project, the project would generate over 2,000 construction jobs and hundreds of long-term jobs. Consistent with the Administration's goals to increase middle-class union jobs, 75% of anticipated total North Slope installation work hours would be union labor. Again, the Willow Project gives us the opportunity for the Administration to work with unions to help set records with labor-management apprenticeship hours, workplace safety, and stewardship. In addition to an influx of much-needed jobs, according to BLM estimates, the Willow Project will generate \$2.3 billion in revenue for the State of Alaska; \$7.6 billion in federal royalties, income taxes and gravel sales; and \$1.2 billion in revenues for the North Slope Borough.

By implementing the best mitigation measures and incorporating deep engagement with stakeholders, the Willow Project can be a model to show what we accomplish when we bring together workers, responsible industry partners, environmental partners, and local communities. For the future of Alaska's jobs and our economy, I urge you to support the

current Record of Decision and allow the Willow project to move forward as planned and previously approved.

Sincerely,

A handwritten signature in blue ink that reads "A.J. Merrick II". The signature is written in a cursive style with a large, stylized initial "A".

A.J. "Joey" Merrick II

CC:

Scott de la Vega, Acting Secretary, Department of Interior
Senator Lisa Murkowski
Senator Dan Sullivan
Congressman Don Young



Founded 1889

United Association of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of the United States and Canada

Three Park Place • Annapolis, Maryland 21401
(410) 269-2000 • Fax (410) 267-0262 • <http://www.ua.org>

Mark McManus
General President

Patrick H. Kellett
General Secretary-Treasurer

Michael A. Pleasant
Assistant General President

General Office File Reference: GP

August 3, 2022

The Honorable Deb Haaland
Secretary
United States Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Dear Secretary Haaland,

On behalf of the more than 359,000 hardworking members of the United Association of Union Plumbers and Pipefitters (UA), I write in strong support of the Willow Master Development Plan (Willow Project) and urge you to swiftly complete the thorough public comment process. The Willow Project has undergone extensive reviews and stands ready to build.

It is long past time we create good-paying union jobs and invest in the North Slope communities that will benefit directly from this project in the National Petroleum Reserve-Alaska.

As you know, the review process for the Willow Project has now spanned three presidencies. This exhaustive review process has included public comment periods, environmental reviews conducted by the federal government, State of Alaska, and communities on the North Slope, and a 30-day scoping period. We are confident in the merits of the Willow Project, especially after such an exhaustive review, and believe that time is of the essence. Swift completion of this process will put our members to work – the best trained and most highly skilled craftspeople in the industry – building the critical infrastructure necessary to meeting our ambitious energy goals. Simply put, the Willow Project will help deliver reliable energy to consumers and provide billions of dollars in economic investment in these communities.

Thank you once again for your commitment to a rigorous and timely review process for not only the Willow Project, but all projects under your purview. We look forward to continuing our work with you, with the Department of the Interior, with the Biden Administration, and with our industry partners to create family-sustaining jobs, deliver reliable and affordable energy, and reach our shared climate goals.

Please do not hesitate to reach out to me or my staff with any questions on this project. The entire United Association stands ready to get to work as soon as this review process is complete.

Sincerely yours,

Mark McManus
General President





THE ALLIANCE

Linking Alaska's Resources to Alaska's People

3301 C Street, Suite 205 | Anchorage, AK 99503 | P (907) 563-2226 | Fax (907) 561-8870 | info@alaskaalliance.com

July 19, 2022

Willow SEIS Comments
222 W. 7th Avenue
Stop #13
Anchorage, Alaska 99513

ATTN: Stephanie Rice:

Dear Ms. Rice:

On behalf of 500 Alliance members and their 35,000 Alaskan employees, I am writing to ask that the BLM stick to the 45 -day comment period for the Willow SEIS.

This is not the Alliance's complete comment on the new SEIS, however, given the importance of timing to get hundreds of Alliance members to work on this project this year, we are submitting this comment to encourage the BLM not to extend the comment period and let people get back to work.

This project has undergone rigorous review for more than 5 years and has provided multiple opportunities over an extensive period of time for public comments and participation. The stakeholder engagement on this project has been extensive, involving the communities who are most directly impacted by the project to express their thoughts, concerns, and ideas about the project.

Please keep the comment period to 45 days and allow this critical economic engine to move forward.

Thank you for your consideration—

Rebecca Logan
CEO

The Alaska Support Industry Alliance



ALASKA DISTRICT COUNCIL OF LABORERS

Laborers' International Union of North America
2501 Commercial Drive • Suite 140 • Anchorage, Alaska 99501
907.276.1640 • Fax: 907.274.7289 • info@alaskalaborers.com

March 1, 2022

Joey Merrick

Business Manager
Secretary-Treasurer
District Council

Business Manager
Laborers' Local 341

Stephanie Rice, BLM Project Manager
222 W. 7th Avenue, Stop #13
Anchorage, AK 99513
Submitted online at: eplanning.blm.gov

Subject: Support for Willow Project & Efficient Completion of 2022 SEIS

Scott Eickholt

President
District Council

Business Manager
Laborers' Local 942

Dear Ms. Rice:

The Alaska District Council of Laborers offers its strong support for the Willow Project and encourages the BLM to complete the 2022 Supplemental Environmental Impact Statement (SEIS) in a timely manner to enable construction to move forward during the 2022-2023 winter season. Given the extensive incorporation of prior public comment and scientific studies, the 2022 SEIS should only address the limited issues identified by the Alaska District Court. The Alaska District Council of Laborers represents 5,500 Alaskans working in construction, the oil and gas industry, the public sector, tourism, and health care. Laborers work in the oil and gas industry from the North Slope to the Valdez Marine Terminal.

The Willow Project has gone through a rigorous environmental review process, incorporating extensive public comment and collaboration with multiple local, state, and federal agencies. The SEIS should only address the discrete issues identified by the Alaska District Court since other aspects of BLM's previous Willow Master Development Plan EIS were upheld and therefore do not require additional analysis.

The Laborers urge BLM to complete the discrete 2022 SEIS and Record of Decision in a timely manner to avoid additional delays in the many public benefits of the Willow Project. Increasing domestic energy production reinvigorates the economy and our local communities. Not only will the Willow Project generate Alaska jobs, it will substantially increase revenue for state and local governments. BLM estimates show that the Willow Project is expected to generate \$2.1 billion in state revenue from production, property, and income taxes as well as \$1.2 billion in property tax revenue for the North Slope Borough. In addition, the project could increase the Trans-Alaska Pipeline System throughput by around 20%, thereby enhancing the viability of this critical infrastructure.

Based on the significant economic benefits of the Willow Project and the narrowly tailored directive of the Alaska District Court, we urge BLM to move forward with an appropriately limited-scope 2022 SEIS. Thank you for the opportunity to comment.

Sincerely,

A.J. "Joey" Merrick II

Jordan Adams

Vice President
District Council

Business Manager
Public Employees Local 71



SOUTHEAST STEVEDORING CORPORATION

CONTRACTING STEVEDORES

P. O BOX 8080

KETCHIKAN, ALASKA 99901

April 12, 2021

The Honorable Deb Haaland
Secretary of the Interior
The Department of Interior
1849 C Street, N.W.
Washington, D.C. 20240

Subject: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Haaland:

Southeast Stevedoring Corporation has been involved in responsible resource development in Alaska for over 69 years and we are writing to express our serious concerns that the Department of Interior intends to review the currently issued Environmental Impact Statement (EIS) and approved Record of Decision (ROD) for the Willow Project in the National Petroleum Reserve-Alaska (NPR-A). This would cause a very costly delay in this project.

In 2013, the Bureau of Land Management (BLM), under the Obama administration, issued a Record of Decision for an updated Integrated Activity Plan (IAP) for the NPR-A and the Willow development plan is consistent with that approved IAP.

The EIS process that led up to the Willow ROD took over two years, thousands of pages of scientific study and many thousand hours of public time and comments were invested into this decision. Based on this thorough public review, and in-depth environmental study, there is no rationale for another review of the ROD analysis for the Willow Project. The BLM efforts over the last 2+ years address the issues raised though the public comment process, and the hundreds of stipulations and best management practices the project will be required to follow.

Additionally, U.S. District Court has denied in full preliminary injunction motions filed by outside environmental advocacy organizations in two separate cases challenging the Record of Decision. The local people in the North Slope Borough provided a declaration with overwhelming support to allow the Willow Project to proceed. The people of Alaska need this project to continue.

Alaska's economy has been devastated by the COVID-19 pandemic and this project will provide over 2,000 construction jobs and hundreds of long-term jobs that are desperately needed. It will also bring in significant revenue to federal, state, and local governments which is critical in Alaska's efforts to recover from the pandemic. The BLM estimates the project will generate over \$1.2 billion in property tax to the North Slope

Borough, \$2.3 billion in revenue to the State of Alaska and \$7.6 Billion to the Federal Government over the life of the project. We all need these resources and this revenue.

While there is a strong focus and desire to move toward greener energy sources that process will take time and the State of Alaska and all of America still needs to develop our own natural resources to meet the needs of our Country. The demand for these natural resources will not decrease and for us to continually stop projects like this that can be responsibly developed in our Country where we have strict regulations is only exporting potential environmental concerns to other countries who are not going to protect the environment as well as we do. The Department of Interior should be a leading Agency to promote a fully approved project like this and not delay it for further so we can responsibly use our own natural resources.

We ask for your support for the current ROD and allow the Willow project to proceed as planned and approved.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Les Cronk', with a long, sweeping underline.

Les Cronk
Vice President
Southeast Stevedoring Corporation



General Steamship Agencies, Inc.

575 Redwood Highway, Suite 200, Mill Valley, California 94941-3007

Tel: (415) 389-5200

Fax: (415) 389-9020

corporate@gensteam.com

www.gensteam.com

April 12, 2021

The Honorable Deb Haaland
Secretary of the Interior
The Department of Interior
1849 C Street, N.W.
Washington, D.C. 20240

Subject: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Haaland:

As an acknowledged industry leader in providing ship agency services in North America for over 100 years and working closely with the oil and gas industry, General Steamship Agencies, Inc. (GSA) urges the Department of Interior to allow the Willow Project in the National Petroleum Reserve-Alaska (NPR-A) to proceed with the currently issued Environmental Impact Statement (EIS) Record of Decision (ROD). We are disappointed about reports that the Department intends to review the current EIS and ROD. This review of the Willow Project will cause harmful delays for a project that has incorporated the best mitigation practices available.

GSA and her waterfront partners provide skilled jobs developing, transporting and exporting Alaska's oil and gas resources in an environmentally responsible way. With the waterfront's excellent safety and environmental record, we rely on such skillfully executed projects to ensure the maximum reasonable protection for personnel and the environment. The current political transition must include family-supporting jobs and maintain environmentally responsible projects like the Willow Project to ensure the economic health of Alaska and our nation.

The Willow Project was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan (IAP) under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over 2 years. There were multiple rounds of public comment and public meetings, numerous meetings between the agencies and ConocoPhillips; over 100 public meetings involving Alaska Native stakeholders; and multiple significant revisions to the project to respond to suggestions and concerns from the Alaska Native community.

The Honorable Deb Haaland
April 12, 2021
Page 2

The project is subject to over 270 mitigation measures and best practices from the 2013 Integrated Activity Plan. In addition, the Willow Project involves many proactive mitigations by ConocoPhillips. Specifically, the Willow Project has focused on lowering emissions and powering drilling rigs electrically once facilities are installed as well as increasing energy efficiency over traditional installations on the North Slope. During the North Slope Borough Rezoning Process, there were additional mitigations incorporated in the project. These include using foam insulation in roads to reduce road height and gravel quantities. The airport footprint was reduced along with adding restrictions for traffic and airport plans. There is also an extended and expanded oil spill mitigation agreement. In addition to the in-depth mitigation measures of the Willow Project, hallmarks of the project planning have been community involvement, stewardship, and respect for subsistence and caribou.

By implementing the best mitigation measures and incorporating deep engagement with stakeholders, the Willow Project can be a model to show what we can accomplish when we bring together workers, responsible industry partners, environmental partners, and local communities. For the future of Alaska's jobs and our economy, I urge you to support the current Record of Decision and allow the Willow Project to move forward as planned and previously approved.

Sincerely,



Scott M. Jones
President

General Steamship Agencies, Inc.
575 Redwood Highway, Suite 200
Mill Valley, CA 94941

AS AGENTS ONLY
ASBA CERTIFIED AGENT

cc: Senator Lisa Murkowski
Senator Dan Sullivan
Congressman Don Young

**Alaska Port
Services**

"Serving all Southwestern Alaska Ports"



ALASKA PORT SERVICES, INC.

P.O. Box 240254

ANCHORAGE, AK 99524-0254

April 7, 2021

The Honorable Deb Haaland
Secretary of the Interior
The Department of Interior
1849 C Street, N.W.
Washington, D.C. 20240

Subject: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Haaland:

As a Maritime Services company who has worked closely the oil and gas industry for over 50 years Alaska Port Services (APS) urges the Department of Interior to allow the Willow Project in the National Petroleum Reserve-Alaska (NPR-A) to proceed with the currently issued Environmental Impact Statement (EIS) Record of Decision (ROD). We are concerned about reports that the Department intends to review the current EIS and ROD. This review of the Willow Project will cause harmful delays for a project that has incorporated the best mitigation practices available.

APS and her waterfront partners provide skilled jobs developing, transporting, and exporting Alaska's oil and gas resources in an environmentally responsible way. With the waterfront's excellent safety and environmental record, we rely on such skillfully executed projects to ensure the maximum reasonable protection for personnel and the environment. The current political transition must include family-supporting jobs and maintain environmentally responsible endeavors like the Willow Project to ensure the economic health of Alaska and our nation.

The Willow Project was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan (IAP) under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over 2 years. There were multiple rounds of public comment and public meetings, numerous meetings between the agencies and ConocoPhillips; over 100 public meetings involving Alaska Native stakeholders; and multiple significant revisions to the project to respond to suggestions and concerns from the Alaska Native community.

The project is subject to over 270 mitigation measures and best practices from the 2013 Integrated Activity Plan. In addition, the Willow Project involves

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ALASKA PORT SERVICES, INC.

P.O. Box 240254

ANCHORAGE, AK 99524-0254

many proactive mitigations by ConocoPhillips. Specifically, the Willow Project has focused on lowering emissions and powering drilling rigs electrically once facilities are installed as well as increasing energy efficiency over traditional installations on the North Slope. During the North Slope Borough Rezoning Process, there were additional mitigations incorporated in the project. These include using foam insulation in roads to reduce road height and gravel quantities. The airport footprint was reduced along with adding restrictions for traffic and airport plans. There is also an extended and expanded oil spill mitigation agreement. In addition to the in-depth mitigation measures of the Willow project, hallmarks of the project planning have been community involvement, stewardship, and respect for subsistence and caribou.

By implementing the best mitigation measures and incorporating deep engagement with stakeholders, the Willow Project can be a model to show what we can accomplish when we bring together workers, responsible industry partners, environmental partners, and local communities. For the future of Alaska's jobs and our economy, I urge you to support the current Record of Decision and allow the Willow project to move forward as planned and previously approved.

Very Respectfully,


Andrew J. Mew

Alaska Port Services®
Anchorage, AK

Cc: Senator Lisa Murkowski
Senator Dan Sullivan
Congressman Don Young



Alaska Maritime Agencies

4341 B Street, Suite 202, Anchorage, AK 99503

Tel: (907) 562-8808 Fax: (907) 782-4110 Email: ancoffice@alaskamaritime.com



April 7, 2021

The Honorable Deb Haaland
Secretary of the Interior
The Department of Interior
1849 C Street, N.W.
Washington, D.C. 20240

Subject: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Haaland:

Founded in 1956, Alaska Maritime Agencies provides ship husbandry services to both foreign and domestic tanker vessel activity here in Alaska, which is heavily supported by the throughput of the oil via the Trans-Alaska Pipeline System (TAPS) from the Alaskan North Slope (ANS) region. We believe the current Environmental Impact Statement (EIS) Record of Decision (ROD) for the Willow Project is more than sufficient, and any further review would cause more unnecessary and costly delays.

The tanker vessel activity resulting from the TAPS production not only helps support our company but provides jobs for a variety of vendors we utilize. These include marine pilots, tug services, line handlers, tank surveyors, terminal workers, provisioning, and crewing services just to name a few. The tanker vessel activity in Prince William Sound (PWS), and subsequent destination of Cook Inlet (CI), has an excellent safety and environmental record while providing the above occupations with a stable source of income.

We strongly believe the Willow Project is essential to maintain a healthy throughput of oil through our Trans-Alaska Pipeline System. The project stands to add up to 100,000 barrels of oil per day, the transport of which provides secure employment for companies like ours. Also, the \$2.3 billion to State of Alaska revenue from production, property, and income taxes, plus \$7.6 billion in federal royalty, income tax, and gravel sales should be a huge boost to both the state and federal coffers.

In addition to the strong revenue forecasts noted above, Conoco Phillips has taken a very responsible and comprehensive approach to involving a variety of stakeholders among the North Slope Villages when developing both their spill mitigation and property enhancement plans. These plans are crafted to respect and protect the local indigenous quality and style of life.

Combining these best mitigation practices along with the strong economic benefits to both state and federal revenues, we highly suggest the Willow Project continues as previously planned and approved.

Very Respectfully,



Luke Hasenbank
President

ALASKA MARITIME AGENCIES®
4341 B Street, Suite 202
Anchorage, AK 99503
24 Hour Main Phone: 1 (907) 562-8808
www.alaskamaritime.com

AS AGENTS ONLY
ASBA CERTIFIED AGENT

Cc: Senator Lisa Murkowski
Senator Dan Sullivan
Congressman Don Young



Western Ocean Services

19020 33rd Avenue West, Suite 365, Lynnwood, WA 98036

Tel: (425) 329-1040 Fax: (425) 329-1041

April 7, 2021

The Honorable Deb Haaland
Secretary of the Interior
The Department of Interior
1849 C Street, N.W.
Washington, D.C. 20240

Subject: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Haaland:

As a Maritime Services company who has worked closely the oil and gas industry for over 50 years Western Ocean Services (WOS) urges the Department of Interior to allow the Willow Project in the National Petroleum Reserve-Alaska (NPR-A) to proceed with the currently issued Environmental Impact Statement (EIS) Record of Decision (ROD). We are concerned about reports that the Department intends to review the current EIS and ROD. This review of the Willow Project will cause harmful delays for a project that has incorporated the best mitigation practices available.

WOS and her waterfront partners provide skilled jobs developing, transporting, and exporting Alaska's oil and gas resources in an environmentally responsible way. With the waterfront's excellent safety and environmental record, we rely on such skillfully executed projects to ensure the maximum reasonable protection for personnel and the environment. The current political transition must include family-supporting jobs and maintain environmentally responsible endeavors like the Willow Project to ensure the economic health of Alaska and our nation.

The Willow Project was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan (IAP) under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over 2 years. There were multiple rounds of public comment and public meetings, numerous meetings between the agencies and ConocoPhillips; over 100 public meetings involving Alaska Native stakeholders; and multiple significant revisions to the project to respond to suggestions and concerns from the Alaska Native community.

The project is subject to over 270 mitigation measures and best practices from the 2013 Integrated Activity Plan. In addition, the Willow Project involves many proactive mitigations by ConocoPhillips. Specifically, the Willow Project has focused on lowering emissions and powering drilling rigs electrically once facilities are installed as well as increasing energy efficiency over traditional installations on the North Slope. During the North Slope Borough Rezoning Process, there were additional mitigations incorporated in the project. These include using foam insulation in roads to reduce road height and gravel quantities. The airport footprint was reduced along with adding restrictions for traffic and



Western Ocean Services

19020 33rd Avenue West, Suite 365, Lynnwood, WA 98036
Tel: (425) 329-1040 Fax: (425) 329-1041

airport plans. There is also an extended and expanded oil spill mitigation agreement. In addition to the in-depth mitigation measures of the Willow project, hallmarks of the project planning have been community involvement, stewardship, and respect for subsistence and caribou.

By implementing the best mitigation measures and incorporating deep engagement with stakeholders, the Willow Project can be a model to show what we can accomplish when we bring together workers, responsible industry partners, environmental partners, and local communities. For the future of Alaska's jobs and our economy, I urge you to support the current Record of Decision and allow the Willow project to move forward as planned and previously approved.

Very Respectfully,


Andrew J. Mew

Western Ocean Services® - Anchorage Office
4341 B St, Ste 202
Anchorage, AK 99503

Cc: Senator Lisa Murkowski
Senator Dan Sullivan
Congressman Don Young

PORT ACCOUNTING AND LOGISTIC SERVICES

19020 33RD AVENUE WEST, SUITE 365, LYNNWOOD, WA 98036

PHONE: (425) 329-1000 FAX: (425) 329-1009

April 7, 2021

The Honorable Deb Haaland
Secretary of the Interior
The Department of Interior
1849 C Street, N.W.
Washington, D.C. 20240

Subject: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Haaland:

As a Maritime Services company who has worked closely the oil and gas industry for over 50 years Port Accounting and Logistic Services (PALS) urges the Department of Interior to allow the Willow Project in the National Petroleum Reserve-Alaska (NPR-A) to proceed with the currently issued Environmental Impact Statement (EIS) Record of Decision (ROD). We are concerned about reports that the Department intends to review the current EIS and ROD. This review of the Willow Project will cause harmful delays for a project that has incorporated the best mitigation practices available.

PALS and her waterfront partners provide skilled jobs related to developing, transporting, and exporting Alaska's oil and gas resources in an environmentally responsible way. With the waterfront's excellent safety and environmental record, all parties have skillfully executed projects to ensure the maximum reasonable protection for personnel and the environment. The current political transition must include family-supporting jobs and maintain environmentally responsible endeavors like the Willow Project to ensure the economic health of Alaska and our nation.

The Willow Project was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan (IAP) under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over 2 years. There were multiple rounds of public comment and public meetings, numerous meetings between the agencies and ConocoPhillips; over 100 public meetings involving Alaska Native stakeholders; and multiple significant revisions to the project to respond to suggestions and concerns from the Alaska Native community.

PORT ACCOUNTING AND LOGISTIC SERVICES

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The project is subject to over 270 mitigation measures and best practices from the 2013 Integrated Activity Plan. In addition, the Willow Project involves many proactive mitigations by ConocoPhillips. Specifically, the Willow Project has focused on lowering emissions and powering drilling rigs electrically once facilities are installed as well as increasing energy efficiency over traditional installations on the North Slope. During the North Slope Borough Rezoning Process, there were additional mitigations incorporated in the project. These include using foam insulation in roads to reduce road height and gravel quantities. The airport footprint was reduced along with adding restrictions for traffic and airport plans. There is also an extended and expanded oil spill mitigation agreement. In addition to the in-depth mitigation measures of the Willow project, hallmarks of the project planning have been community involvement, stewardship, and respect for subsistence and caribou.

By implementing the best mitigation measures and incorporating deep engagement with stakeholders, the Willow Project can be a model to show what we can accomplish when we bring together workers, responsible industry partners, environmental partners, and local communities. For the future of Alaska's jobs and our economy, I urge you to support the current Record of Decision and allow the Willow project to move forward as planned and previously approved.

Very Respectfully,



Andrew J. Mew

Port Accounting & Services®
19020 33rd Avenue West, Suite 365
Lynnwood, WA 98036
Tel: (425) 329-1000

AS AGENTS ONLY
ASBA CERTIFIED AGENT

Cc: Senator Lisa Murkowski
Senator Dan Sullivan
Congressman Don Young



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Valdez Homer Seward Fairbanks Dutch Harbor Delta Junction North Slope

The Honorable Deb Haaland
Secretary of the Interior
The Department of Interior
1849 C Street, N.W.
Washington, D.C. 20240

March 29, 2021

Subject: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Haaland:

As a construction company in the oil and gas industry for over 70 years North Star Equipment Services (NSES) urges the Department of Interior to allow the Willow Project in the National Petroleum Reserve-Alaska (NPR-A) to proceed with the currently issued Environmental Impact Statement (EIS) Record of Decision (ROD). We are disappointed about reports that the Department intends to review the current EIS and ROD. This review of the Willow Project will cause harmful delays for a project that has incorporated the best mitigation practices available.

NSES provides many good paying jobs developing Alaska's oil and gas resources in an environmentally responsible way. With our excellent safety and environmental record, we have skillfully executed projects to make sure our workers go home unaffected and the environment unharmed. The current political transition must include family-supporting jobs and maintain environmentally responsible projects like the Willow project to ensure the economic health of Alaska and our Country.

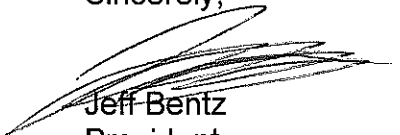
The Willow Project was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan (IAP) under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over 2 years. There were multiple rounds of public comment and public meetings, numerous meetings between the agencies and ConocoPhillips; over 100 public meetings involving Alaska Native stakeholders; and multiple significant revisions to the project to respond to suggestions and concerns from the Alaska Native community.

The project is subject to over 270 mitigation measures and best practices from the 2013 Integrated Activity Plan. In addition, the Willow Project involves many proactive mitigations by ConocoPhillips. Specifically, the Willow Project has focused on lowering emissions and powering drilling rigs electrically once facilities are installed as well as increasing energy efficiency over traditional

installations on the North Slope. During the North Slope Borough Rezoning Process, there were additional mitigations incorporated in the project. These include using foam insulation in roads to reduce road height and gravel quantities. The airport footprint was reduced along with adding restrictions for traffic and airport plans. There is also an extended and expanded oil spill mitigation agreement. In addition to the in-depth mitigation measures of the Willow project, hallmarks of the project planning have been community involvement, stewardship, and respect for subsistence and caribou.

By implementing the best mitigation measures and incorporating deep engagement with stakeholders, the Willow Project can be a model to show what we can accomplish when we bring together workers, responsible industry partners, environmental partners, and local communities. For the future of Alaska's jobs and our economy, I urge you to support the current Record of Decision and allow the Willow project to move forward as planned and previously approved.

Sincerely,



Jeff Bentz
President

Cc: Senator Lisa Murkowski
Senator Dan Sullivan
Congressman Don Young



Alaska Delegation Letters of Support

Congress of the United States
Washington, DC 20515

September 16, 2022

The Honorable Deb Haaland
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Haaland:

We write to reiterate our strong support for the Willow Master Development Plan (Willow or Project) in the National Petroleum Reserve-Alaska (NPR-A). The expeditious approval of this crucial project would greatly benefit Alaska, our nation, and the world, while demonstrating the Administration's commitment to addressing inflation, high energy costs, the need for greater energy security, and environmental justice initiatives.

On July 8, 2022, the Department of the Interior (Department or DOI) published a draft supplemental environmental impact statement (SEIS) for Willow. We appreciate the Department's recognition that 45 days provided sufficient time for public comment on the SEIS. After years of study and review, both the Administration and Alaskans can feel confident that the Project will abide by the strictest environmental considerations in the world, while being constructed and operated by a company with an impressive record of safe and responsible development on the North Slope.

Willow will be a significant economic driver for Alaska, creating thousands of high-paying construction jobs, primarily with labor from union workers, and hundreds of permanent positions. ConocoPhillips has already invested more than \$500 million in the development of Willow's leases, which were acquired in 1999 during the Clinton administration, and plans to spend upwards of \$8 billion in total.

The Project will also generate as much as \$17 billion in new revenues for the federal government, the State of Alaska, the North Slope Borough, and communities in and around NPR-A. In fact, the Bureau of Land Management estimated in the draft SEIS that the Project would generate \$3.91 billion in new federal revenue, \$3.54 billion in revenue for the State of Alaska, and \$1.25 billion in revenue for the North Slope Borough.

As Julie Kitka, President of the Alaska Federation of Natives, wrote to you, Willow "could jumpstart our economy with thousands of jobs and be a model in community and environmental stewardship for years to come."¹ Similarly, the Iñupiat Community of the Arctic Slope, North Slope Borough, and Arctic Slope Regional Corporation wrote to you that:

¹ Letter from Julie Kitka, President, Alaska Federation of Natives, to the Honorable Debra Haaland, Secretary, U.S. Department of the Interior (Feb. 23, 2022).

“The current development plan for Willow incorporates local knowledge and input, and it was specifically designed to protect surface values and to protect the Iñupiat way of life, including subsistence... we are satisfied that the mitigation measures adopted by the Department will protect the land, water, and wildlife resources of the North Slope, as well as our communities’ health and wellbeing. We are united in our continuing support for the Willow project. And if this Administration is truly committed to Alaska Native self-determination and the meaningful involvement of our people in federal decisions tied to our ancestral lands, it must listen to the elected regional Alaska Native leadership who speak in unified support for Willow, not to outside interests.”²

Those are many more individuals and groups that strongly support the Willow project. For example, it has drawn backing from North Slope mayors and communities, Alaska AFL-CIO, building trades, LIUNA, Alaska’s congressional delegation, and the President of the United States.

In the midst of their strong support, it has been 14 months since a federal court remanded the alternatives analysis to BLM, so it is reasonable for the agency to move forward and complete the permitting process. We believe the final SEIS should identify the preferred alternative; appropriately weight the purpose of energy production in the NPR-A; and recognize the public interest in supporting energy security and responsible resource development. The permitting process must be completed by the end of 2022 at very latest so the project’s proponent can make a final investment decision and hire Alaskans in time for the winter construction season. That decision will not be possible, and none of those jobs will be created, in the absence of a clean and timely Record of Decision (ROD).

We urge the Department to select a preferred alternative for the final SEIS that facilitates at least as much infrastructure and access to North Slope resources as Alternative E, and look forward to the Department’s swift re-approval of the Willow Master Development Plan. This is a pivotal moment for our Alaska and our country, where the timely approval of projects today can assure needed future supply and help us avoid the type of crisis affecting many of our foreign allies.

² Letter from Morrie Lemen, Executive Director, Iñupiat Community of the Arctic Slope; Harry K. Brower, Jr., Mayor, North Slope Borough; and Rex A. Rock, Sr., President and CEO, Arctic Slope Regional Corporation, to the Honorable Deb Haaland, Secretary, U.S. Department of the Interior (July 21, 2022).

The economic development and energy security benefits that Willow will provide can be realized through a ROD that is completed in time for this year's winter construction season to proceed. Alaskans are counting on you to make that happen.

Sincerely,



Lisa Murkowski
United States Senator



Dan Sullivan
United States Senator



Mary Sattler Peltola
Representative for All Alaska

CC: *The Honorable Tommy Beaudreau, Deputy Secretary, Department of the Interior*
The Honorable Tracy Stone-Manning, Director, Bureau of Land Management

United States Senate

WASHINGTON, DC 20510

March 8, 2022

The Honorable Deb Haaland
Secretary, U.S. Department of the Interior
1849 C St, NW
Washington, DC 20240

Dear Secretary Haaland:

We write to reiterate our strong support for the Willow Master Development Plan (Willow), and to urge the Department of the Interior to expeditiously complete a Supplemental Environmental Impact Statement (EIS) that leads to federal re-approval of this critical project.

The Bureau of Land Management's (BLM) review process for Willow has consisted of a rigorous multi-year environmental analysis with coordination across four federal agencies, the State of Alaska, affected communities on the North Slope, Alaska Native Tribes, and the general public. The prior Record of Decision and Final EIS also facilitated robust public participation, including more than a dozen in-person meetings and a total of nearly five months of public comment periods.

The results of the process were clear: Willow is an environmentally conscious project that abides by the strictest environmental considerations in the world and has widespread support across Alaska from Alaska Natives, building trades and organized labor, and the public.

Today, Willow is supported by the Alaska Federation of Natives, the Inupiat Community of the Arctic Slope, and the North Slope Borough (NSB), among many others. It has drawn such extensive support because its operator, ConocoPhillips, has an excellent record of responsible development in our state, and because it will be a key source of job creation, government revenues, and energy security—all of which are needed in these turbulent times.

Willow is estimated to support hundreds of new, permanent, and well-paying jobs, many of which will be union jobs—a remarkable number for any project in Alaska. Many of its jobs will be filled by those who live in the North Slope Borough, while others will help Alaskans who remain unemployed or underemployed in the wake of the pandemic. This is particularly important for an industry that lost an estimated 30 percent of its jobs between 2019 and 2021 due to the pandemic.

By BLM's own estimates, Willow is projected to generate \$2.1 billion for the State of Alaska and \$1.2 billion for the NSB at oil prices dramatically lower than what we face today. Higher prices will generate more revenues for governments at all levels. The NSB will use its share of

those funds to support valuable community water and sewer infrastructure; educational services, including Alaska's only tribal college; and coastal and climate resiliency projects.

The war in Ukraine further underscores the urgency and need for Willow. Oil prices were already high, but have risen even further since the start of Russia's unprovoked atrocities. Countries around the world, especially our own, must shift away from any dependence on Russian energy. The Willow Project and its estimated 160,000 barrels of daily supply can play a major role in making sure that happens.

Willow also meets the stated goals for the administration's environmental justice initiatives. Approximately three-quarters of the Borough's nearly 10,000 permanent residents are Inupiat, with over 98 percent of Inupiat households living a subsistence lifestyle. Willow will be an example of responsible resource development that meets all local and federal laws while providing benefits to underserved and minority communities, while successfully balancing the needs of regional subsistence users through strong mitigation measures.

We firmly believe BLM should complete a Supplemental EIS and Record of Decision for Willow in time to allow for construction to begin during the 2022-2023 winter season. This is possible within the legal and administrative processes and would demonstrate seriousness about rising energy prices and the need for greater energy security. There is no better time and no better way to reassure our allies that the United States will help stabilize markets, prevent shortages, and lower prices.

Willow is a major project, located in our National Petroleum Reserve, which was specifically designated for energy development. The delays it has already faced are deeply unfortunate, and it now awaits approval at a key moment. In light of inflation, rising gas prices, and a dramatic shift in international geopolitics, we urge you to recognize the immense benefits this project will bring and to act promptly to approve it.

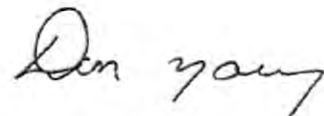
Sincerely,



Lisa Murkowski
United States Senator



Dan Sullivan
United States Senator



Don Young
Congressman for All Alaska

DON YOUNG
CONGRESSMAN FOR ALL ALASKA
WASHINGTON OFFICE:
2314 RAYBURN BUILDING
WASHINGTON, DC 20515
202-225-5765



Congress of the United States
House of Representatives
Washington, D.C. 20515

COMMITTEE ON
NATURAL RESOURCES
CHAIRMAN EMERITUS

COMMITTEE ON
TRANSPORTATION & INFRASTRUCTURE

REPUBLICAN
POLICY COMMITTEE

CANADA-U.S.
INTER-PARLIAMENTARY GROUP

February 23, 2022

The Honorable Debra Haaland
Secretary of the Interior
U.S. Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Dear Secretary Haaland:

I am writing in response to the letter you recently received from House Natural Resources Committee Chairman Raul Grijalva about the Willow project in my state, Alaska. I firmly oppose his request that you “suspend” or “freeze” the Willow permitting process. Willow should get fair consideration on its merits under the National Environmental Policy Act and other applicable law. I thank you for the Administration’s earlier support and defense of the Willow project Record of Decision in court.

Willow is not a typical oil and gas development or the product of any single federal administration. Willow has been designed under laws uniquely applicable to Alaska, including the Naval Petroleum Reserve Production Act of 1976, the Alaska National Interest Lands Act of 1980, and the local land use and zoning requirements of the North Slope Borough. At the heart of each of these processes is the goal of using public lands to best serve the broad public interest. There are very few projects that serve the public interest better than Willow.

The processes leading to approval of Willow began in 1999, during the Clinton Administration, when the first Willow-area oil and gas leases were sold by BLM. After years of careful exploration efforts, the area is finally ready for development and production under a plan that includes up to five drill sites connected to existing development on the eastern edge of the massive National Petroleum Reserve-Alaska (NPR-A). The project design complies with the NPR-A Integrated Activity Plan (IAP) developed by the Obama-Biden Administration in 2013. The 2013 IAP adopted the most environmentally protective alternative considered at the time and had the support of many of the environmental advocacy groups that are now opposing Willow. Although a new IAP was adopted in 2020, BLM has recently announced a plan to revert to the 2013 IAP. The IAPs primarily address future leasing decisions and reverting to the 2013 IAP would pose no obstacle to the Willow project.

Our great country has the most stringent environmental regulations for oil and gas development anywhere, and nowhere is that truer than in Alaska. Willow protects the land, wildlife and subsistence activities that are unique to the region. Contrary to suggestions otherwise, Willow complies with all applicable requirements of the Teshekpuk Lake Special Area and the Colville River Special Area. The project has design features such as elevated pipelines that are proven to provide for caribou passage. The project has mitigation measures such as parking areas and boat launches to ensure improved access for hunting, fishing, and other subsistence activities. The project is subject to conditions of approval imposed by the North Slope Borough local government, which applies strict zoning criteria to ensure development does not adversely impact subsistence. In January 2021, the Borough Assembly – which includes representatives from all NPR-A communities and their predominantly Inupiat residents – approved rezoning of lands specifically to allow Willow construction to proceed.

As directed by existing federal law, 50 percent of the federal royalties from Willow production will be available to fund a grant program administered by the State of Alaska for the benefit of affected communities. This program is already in effect, but the current funding is small compared to what communities are rightfully expecting when Willow comes online. Under BLM's estimate, this program will make \$2.6 billion available over the 30-year life of the project to communities impacted by development. These grant funds will be available to NPR-A villages – historically, grants have been provided to Utqiagvik (Barrow), Atkasuk, Nuiqsut, Anaktuvuk Pass, and Wainwright -- to serve public safety, public health, climate change resiliency, education, and other important public uses.

Willow is a balanced development plan that was refined during an extensive public process, complies with the law, and serves the broad public interest. Willow should not be a mythical climate change symbol as advocated by people far removed from Alaska who contend that moving Willow forward is incompatible with addressing climate change challenges. That contention is wrong. Outside groups attempting to advance their agendas at the expense of the majority of North Slope Alaska Native stakeholders who support the Willow project is offensive to me and to them, as noted in the attached January 26, 2022, letter from the Inupiat Community of the Arctic Slope, the North Slope Borough, and the Arctic Slope Regional Corporation to Chairman Grijalva.

Production from Willow would constitute a tiny fraction of national and international greenhouse gas emissions. If Willow were to be blocked, those emissions would occur anyway or even be exceeded from production generated in places like Russia or elsewhere, who have worse environmental records and standards, and whose outputs would still be traded on the international market. The reality is that oil and gas production is necessary, now and in the future, even as a transition to lower-emission energy sources occurs over time. I am not aware of any source of oil and gas production that the U.S. government should prefer to Willow. The project makes use of existing infrastructure like the Trans-Alaska Pipeline system; provides public revenue streams to federal, state and local governments; will fund an existing mitigation program that makes grants available to local communities; protects subsistence resource and access for subsistence activities; and has broad support in Alaska and the North Slope region. Thus, the project fulfills core

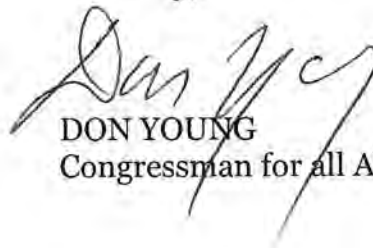
principles of environmental justice and should rise to the top of any list of realistic energy development projects worthy of approval.

I urge you to reject calls to stall approval of the Willow project. I further urge you to direct staff in the Department of the Interior and the BLM to complete a supplemental environmental impact statement and new Record of Decision in a timely fashion to address the narrow issues identified in the Federal District Court's ruling and bring the benefits of the Willow project to life. A reminder that Willow has extensive support from the North Slope Inupiat people:

- The Inupiat Community of the Arctic Slope
- The Voice of the Arctic Inupiat
- The North Slope Borough
- The ANCSA Regional Association
- Arctic Slope Regional Corporation
- The Alaska Native Village Corporation Association
- The Cities of Utqiagvik, Wainwright and Atkasuk


I would welcome the opportunity to discuss Willow with you at any time, and further to facilitate your meeting with the groups above to hear from them directly.

Sincerely,



DON YOUNG
Congressman for all Alaska

P.S.
Do what is
RIGHT



United States Senate

July 15, 2022

The Honorable Deb Haaland
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Haaland:

We write to reiterate our strong support for the Willow Master Development Plan (Willow) in the National Petroleum Reserve-Alaska (NPR-A), and to urge the U.S. Department of the Interior to complete, without delay, a thorough public comment process for the July 2022 draft supplemental environmental impact statement (SEIS) for this critical project.

The SEIS published on July 15 is limited to one new project alternative, which includes fewer drill sites and reduced surface impacts. At the end of this 45-day comment period, the project will have undergone 215 days of public comment with 25 public meetings, on top of a 30-day scoping period this past February. This clearly represents a comprehensive and rigorous public comment process.

We therefore firmly believe that a 45-day comment period will allow all stakeholders and the general public more than enough time to review the SEIS and provide meaningful comment. Timely completion of this process is critical to the project's ability to undertake any level of development activities during the rapidly-approaching 2022-2023 winter season – the shortest construction season in the world due to Alaska's world class environmental standards, which incorporate standards, including ice roads and pads, which virtually eliminate any surface disturbance. It would also demonstrate the urgency required to address the seriousness of rising energy costs, the need for greater energy security, and the Administration's stated goals for its environmental justice initiatives.

As we previously noted in our March 8, 2022 letter, the review process for Willow has already consisted of multi-year environmental analyses by the Bureau of Land Management (BLM) across multiple federal agencies, the State of Alaska, and affected communities on the North Slope. The results have shown that Willow abides by the strictest environmental considerations in the world and has widespread support across Alaska and committed support from the President of the United States. The Alaska District Council of Laborers, for example,

has pointed out, “not only will the Willow Project generate Alaska jobs, it will substantially increase revenue for state and local governments.”¹

Alaska Natives are also especially supportive of this project, as it would contribute to their economic well-being and prosperity for years to come. For example, Julie Kitka, President of the Alaska Federation of Natives, wrote to you in a letter that Willow “could jumpstart our economy with thousands of jobs and be a model in community and environmental stewardship for years to come.”² Hallie Bissett and Kim Reitmeier, Executive Directors, respectively, of the Alaska Native Village Corporation Association and ANCSA Regional Association, have urged you not delay Willow “given the exhaustive and thorough review process it has already undergone, and the urgent need for vetted, economic opportunities for safe development in Alaska.”³ The cities of Utqiagvik, Wainwright, and Atkasuk, located on the North Slope, have even passed resolutions in support of oil and gas development projects, like Willow, within the NPR-A, and explicitly asked you “not to undercut us as a people and to honor the work” they have done with your agencies throughout the development of Willow.⁴

Again, given BLM’s previous evaluations of Willow, a 45-day public comment period is a sufficient time frame for any interested party to wholly evaluate the SEIS. Willow has already faced multiple delays, and now again awaits approval at a pivotal moment. Given the current pace of inflation, high gas prices, and international geopolitics, we urge you to recognize the immense benefits this project will bring and act promptly to approve it.

Sincerely,



Lisa Murkowski

United States Senator



Dan Sullivan

United States Senator

¹ Letter from A.J. “Joey” Merrick II, Secretary-Treasurer, Alaska District Council of Laborers, to Stephanie Rice, Project Manager, Bureau of Land Management (Mar. 1, 2022).

² Letter from Julie Kitka, President, Alaska Federation of Natives, to the Honorable Debra Haaland, Secretary, U.S. Department of the Interior (Feb. 23, 2022).

³ Letter from Hallie Bissett, Executive Director, Alaska Native Village Corporation Association, and Kim Reitmeier, Executive Director, ANCSA Regional Association, to the Honorable Debra Haaland, Secretary, U.S. Department of the Interior (Feb. 4, 2021).

⁴ Letter from Fannie Suvlu, Mayor, City of Utqiagvik, Alaska, John Hopson, Jr., Mayor, City of Wainwright, Alaska, and Doug Whiteman, Mayor, City of Atkasuk, Alaska, to the Honorable Debra Haaland, Secretary, U.S. Department of the Interior (Apr. 26, 2021).

CC: The Honorable Tommy Beaudreau, *Deputy Secretary, Department of the Interior*
The Honorable Tracy Stone-Manning, *Director, Bureau of Land Management*

Alaska State Government Letters of Support



July 22, 2022

Tommy Beaudreau
Deputy Secretary
U.S. Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Re: Willow Master Development Plan Public Comment Period

Dear Deputy Secretary Beaudreau:

I write to call your attention to the attached letter provided by the Department of Natural Resources' Office of Project Management and Permitting in their role as a cooperating agency on the development of the Willow Master Development Plan Supplemental Environmental Impact Statement (SEIS). For all the reasons described in the letter, it is critical that the Bureau of Land Management (BLM) proceed through the process for the SEIS without granting requests for delays and extensions based on fundamental misrepresentations about the project or the scope and thoroughness of the reviews conducted to date.

We make this request on behalf of discrete public interests. First, this project has been under review since 2016, with multiple public comment periods (many already extended), dozens of public meetings, and thousands and thousands of personnel hours devoted to the development, review, and public discussion of the information now distilled in the SEIS. The Alaskans that have participated in this process from the beginning deserve resolution. Second, the Alaskans that are poised to benefit from the project continue to suffer from delays. Workers on the verge of starting the project were paused over the Christmas holiday in 2020 and enjoined from doing so in early 2021, and continue to await resolution. The communities of the North Slope that would receive property taxes and National Petroleum Reserve – Alaska (NPR-A) impact mitigation grants continue to have promised returns from development pushed further into the future. Collectively, these communities continue to express support for the prompt finalization of the SEIS, and we actively join them in doing so. Third, it is increasingly apparent how important domestic energy production is to the American people. The international turmoil that has characterized this year to date repeatedly shows how critical control of energy supplies is to security at home and positive influence abroad.

We look forward to participating in the upcoming public meetings, submitting substantive comments on the Draft SEIS within the 45-day comment period, and actively continuing to work as a cooperating agency as the robust public process continues.

Sincerely,

A handwritten signature in blue ink, appearing to read "Akis Gialopsos". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Akis Gialopsos
Acting Commissioner

Cc: U.S. Senator Lisa Murkowski
U.S. Senator Dan Sullivan
Tracy Stone-Manning, Director, Bureau of Land Management



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources

OFFICE OF PROJECT MANAGEMENT AND PERMITTING

550 West 7th Avenue, Suite 1430
Anchorage, AK 99501-3561
Main: 907.269-8690
Fax: 907-269-5673

July 22, 2022

Bureau of Land Management – Alaska State Office
Attention – Willow Supplemental Draft Environmental Impact Statement
222 West Seventh Avenue, Number 13
Anchorage, Alaska, 99513

Re: Willow Master Development Plan – draft Supplemental Environmental Impact Statement
45-day public comment period

Dear State Director Cohn and BLM Project/EIS lead Rice,

The State of Alaska, as a cooperating agency, is reviewing the Draft Supplemental Environmental Impact Statement (SEIS) for the Willow Master Development Plan (Willow), which is currently out for a 45-day public review. As we review the draft SEIS, we want to reiterate the importance of the Willow project and the timely completion of the federal environmental review process, which is of critical interest to the State, the Nation, and North Slope stakeholders. The State of Alaska strongly encourages BLM to confirm this 45-day public review period is appropriate and proceed through the process without any delay. Complete comments from the State of Alaska in response to the SEIS are forthcoming under separate cover.

We firmly believe that a 45-day comment period will allow all stakeholders ample time to review the updated information included in this SEIS. The Willow project has gone through numerous reviews and public notices focused on these same conceptual items. To date the Bureau of Land Management (BLM) has conducted two scoping periods (including one in March 2022, which was not required by federal law), produced three draft EIS's (two supplemental drafts), one final EIS, and one Record of Decision (ROD), which was the subject of judicial review. Throughout the environmental review process BLM has afforded the cooperating agencies and the public multiple opportunities to review and comment on the proposed activities and analysis of potential effects. Naturally, this process becomes more focused as it proceeds, and the material in the SEIS now under review is the culmination of years of process and nearly 200 days of public comment to date. It is also important to note that this will not be the last opportunity to for public submissions on this material – the Final SEIS will be reviewed by cooperating agencies before it is published, and the public will have yet another opportunity to submit views and input on the project before BLM publishes the ROD.

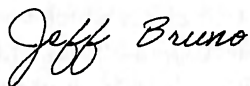
Additionally, during the development of this most recent draft SEIS, BLM has held numerous meetings and workshops for a variety of stakeholders to receive input, walk stakeholders through the analysis, and answer questions – to ensure that stakeholders would be well prepared to submit

comments on the material in the SEIS. BLM will also conduct five public hearings over the next month to ensure that the stakeholders have multiple opportunities to learn about the draft SEIS analysis, ask questions, and submit comments. In addition to the multiple reviews, additional scoping period, and other stakeholder participation opportunities that have been provided for the SEIS – in addition to the years of process leading to the SEIS – it is important to note that there is limited new information to be considered and reviewed within this draft SEIS. Only one new alternative was identified, alternative E, which ultimately reduced the number of proposed pads, wells, and overall footprint of the project. With such a reduced footprint, information in this alternative has effectively already been seen and reviewed by North Slope stakeholders and the public.

Bringing projects like Willow online is one of the single most effective actions BLM can take to support North Slope communities and promote an autonomous and self-sustaining future that provides “environmental justice” benefits for local communities and reduces “environmental justice” impacts as assessed by BLM. In fact, not allowing the Willow project to efficiently move forward would be the biggest “environmental justice” impact of all. Delaying or stopping the first major production in NPR-A would deprive NPR-A communities of a long-promised partnership in the benefits of resource production. The Willow development is the answer to mitigating a host of “environmental justice” impacts to NPR-A communities, but without the production royalties from projects like Willow and future NPR-A developments this program will not be able to generate revenue and fund necessary mitigation projects as promised by the federal government. Further delays on this project are not in the public interest and will continue to have significant negative impacts on to the State of Alaska, North Slope Borough, NPR-A communities, and other North Slope stakeholders.

For these reasons, the State of Alaska affirms our support of BLM’s published 45-day review period for the SEIS and our commitment as a cooperating agency to assist in the review process. BLM has provided ample opportunities for review and input from all interested stakeholders, including the State of Alaska, and any extension to the comment period is not warranted.

Sincerely,



Jeff Bruno
Department of Natural Resources
Office of Project Management
Project Coordinator
907-269-7476
jeff.bruno@alaska.gov

Cc: Acting Commissioner Gialopsos – Alaska Department of Natural Resources
Commissioner Brune – Alaska Department of Environmental Conservation
Commissioner Vincent-Lang – Alaska Department of Fish and Game

Alaska State Legislature

Official Business



Alaska State Capitol
Juneau, Alaska
99801

Willow DEIS Comments
BLM Alaska State Office
22 W 7th Ave. #13
Anchorage, AK 99513

TRANSMITTED VIA ELECTRONIC MAIL

4 May 2020

To whom it may concern,

We are writing in support of the Draft Environmental Impact Statement for ConocoPhillips' Willow oil and gas prospect. This project is absolutely critical for Alaska from both an economic and social perspective.

In recent decades, our oil and gas industry and support contractors have developed increasingly sophisticated and effective means of exploring for and producing oil and gas with minimal surface footprint. As a result, we are able to produce more oil with less impact on local wildlife such as caribou, eiders, and other species on the North Slope. Oil and gas exploration and production can now increase local income and job opportunities — with associated positive social impacts—without significant negative impacts to subsistence activities.

Alaska depends on the oil and gas industry, not just for jobs, but also for income. Our state depends on oil-related revenue to finance schools, public safety, transportation, and more. Along with earnings from the Permanent Fund, oil is the lifeblood of our state budget. For this reason, the Willow prospect is extremely important for the state's economic future.

In conclusion, we support the Willow prospect and look forward to the positive impact this important development will have on local communities and throughout Alaska.

Thank you for your consideration.

Sincerely,



Representative Kelly Merrick
District 14



Senator Shelley Hughes
District F



Representative Bart LeBon
District 1



Senator Peter Micciche
District O



Representative Mike Prax
District 3



Senator Josh Revak
District M



Representative Colleen Sullivan-Leonard
District 7



Representative George Rauscher
District 9



Representative Cathy Tilton
District 12



Representative Sara Rasmussen
District 22



Representative Chuck Kopp
District 24



Representative Mel Gillis
District 25



Representative Lance Pruitt
District 27

Members of the Alaska State Legislature



Date: August 20, 2022

To: Steve Cohn
Director, U.S. Bureau of Land Management-Alaska
Willow SEIS Comments
222 W. 7th Avenue, Stop #13
Anchorage, Alaska 99513

Re: Support for the Willow Project Draft SEIS Alternative E

Dear Director Cohn,

We write today to provide comment on the Willow Project draft Supplemental Environmental Impact Statement (SEIS) and convey our support for Alternative E.

Alaskans rely upon oil and gas production, as well as other natural resources, to sustain our lives. It is of the utmost importance that our resources be developed with the highest environmental standards to safeguard our great State for future generations. We are proud of the fact that oil production on the North Slope and transportation through the Trans-Alaska Pipeline System (TAPS) 800-miles to the terminus in Valdez is consistently accomplished in an environmentally sound manner. We have every reason to believe that Alternative E will continue this record of great stewardship.

During the many years of the Willow Project EIS process much public scrutiny has concluded with SEIS Alternative E that modified the EIS to include additional environmental protections. Several other alternatives have been extensively considered and have been determined to be cost prohibitive or have been determined by our courts to be flawed. The process has been engaged in faithfully by all participants and can be trusted to provide adequate environmental protections during the development of the natural resources.

It is this development that we would like to impress upon you as vitally important to us and the many Alaskans we represent. The Willow Project is anticipated to generate billions of dollars in state revenue, thousands of construction jobs, and hundreds of permanent positions bringing much needed economic activity to many diverse communities throughout Alaska. These economic benefits, along with federal royalties and local property taxes for remote communities on the North Slope, make the

Willow Project a priority for Alaska lawmakers.

The Willow Project will also promote national energy independence by increasing our supply of domestic oil by approximately 180,000 barrels per day. With world-wide demand for oil projected to continue to increase for decades, the Willow Project is critically important to maintaining stable economic conditions as the world transitions to other renewable energy sources.

It is with great hope for the future economic security of Alaskans and the Nation, and the protection of our great State, that we respectfully request that you approve the SEIS Alternative E and a path forward for the Willow Project.

Sincerely,



Representative Rauscher District 9



Representative Carpenter District 29



Representative Tilton District 12



Representative Gillham District 30



Representative McKay District 24



Representative Kaufman District 28



Representative McCabe District 8



Representative Shaw District 26



Representative Cronk District 6



Representative LeBon District 1



Representative Johnson District 11



Representative Thompson District 2



Representative McCarty District 13



Representative Rasmussen District 22



Representative Vance District 31



Representative Nelson District 15

Cc: The Honorable Deb Haaland
Secretary, U.S. Department of the Interior



OFFICIAL BUSINESS

ALASKA STATE SENATE

32nd LEGISLATURE

August 26, 2022

Steve Cohn, Director
Alaska State Office
Bureau of Land Management
222 West Seventh Avenue – Mailstop 13
Anchorage, AK 99513
VIA ELECTRONIC MAIL

Subject: Support for Willow Project, Alternative E & Timely Completion of SEIS

Dear Mr. Cohn:

We urge the Bureau of Land Management (BLM) to adopt the Draft Supplemental Environmental Impact Statement (SEIS) for the Willow Project to allow construction to move forward during the 2022-23 winter season to prevent any additional delays. The Draft SEIS included a new project alternative, Alternative E, which represents a good path forward for this project so critical to Alaska.

The Willow Project has undergone an extensive environmental review process that has lasted nearly five years. The Alaska District Court required just three narrow issues in the previous final EIS to be updated, which are addressed in this draft SEIS. Alternative E includes fewer drill sites and reduced surface impacts and does not require a prolonged review period. The 45-day comment period is more than sufficient for public engagement on the Draft SEIS. In addition to adopting a Final SEIS in a timely fashion, the BLM should refrain from extending the 45-day comment period for the Draft SEIS.

Alaskans across the state stand to benefit from the Willow project. The construction and installation phase of the project will require an estimated nine million manhours of labor, equating to 2,000 construction jobs. Willow operations will create 300 permanent jobs. Most of the construction and operations work will be done by Alaskans. As the U.S. appears to be entering a recession, Willow presents a unique opportunity to support Alaska's economy and workforce.

In addition to the job opportunities the project will generate for Alaskans, there will be significant fiscal benefits. Based on the BLM Draft SEIS analysis of two oil price scenarios, Willow could produce between \$1.3 and \$5.2 billion in State of Alaska revenue from production, property and income taxes over the life of the project. This equates to additional State revenue

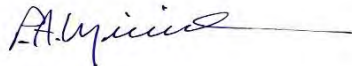
that averages between \$40 and \$170 million each year, depending on price. Members of the Senate have long advocated that Alaska can achieve fiscal stability through safely and responsibly producing the natural resources on our public lands. The Willow project will also provide benefits to all Alaskans by supporting public services like programs to help the disadvantaged succeed, good schools and safe communities.

Alaskans are not the only beneficiaries of the Willow Project going forward. Our nation's energy security is reaching a new low and warrants strong consideration. The production of oil and gas in Alaska is second to none when it comes to compliance with stringent safety and environmental regulations. We support laws and regulations governing production and transportation of all petroleum products and hold high expectations for those operating within our great state. Alaskans take great pride in the fact that our pristine state is being protected for generations to come.

Given the substantial economic benefits to local communities, the State of Alaska, and the nation, as well as the narrow directive from the federal district court, we ask that BLM adopt the Willow Draft SEIS, Alternative E, in a timely manner. We feel there has been sufficient public engagement to move forward without further delay based on the five public comment periods, the series of public meetings, and the extensive scientific and agency reviews.

Thank you for the opportunity to comment on this critical project for Alaska's future.

Sincerely,



Peter A. Micciche
Senate District O
Senate President



Tom Begich
Senate District J
Minority Leader



Click Bishop
Senate District C



Mia Costello
Senate District K



Elvi Gray-Jackson
Senate District I



Lyman Hoffman
Senate District S



Roger Holland
Senate District N



Shelley Hughes
Senate District F
Majority Leader



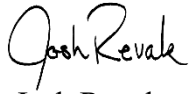
Scott Kawasaki
Senate District A



Robert Myers
Senate District B



Lora Reinbold
Senate District G



Josh Revak
Senate District M



Mike Shower
Senate District E



Bert Stedman
Senate District R



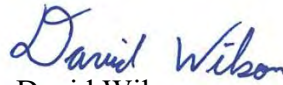
Gary Stevens
Senate District P



Natasha von Imhof
Senate District L



Bill Wielechowski
Senate District H



David Wilson
Senate District D

Alaska State Legislature



Date: August 12, 2022

To: Steve Cohn
Director, U.S. Bureau of Land Management-Alaska
Willow SEIS Comments
222 W. 7th Avenue, Stop #13
Anchorage, Alaska 99513

Re: Support for the Willow Project, the Draft SEIS, and Responsible Oil and Gas Development

Dear Director Cohn,

We write today in support of the Willow Project, the draft supplemental environmental impact statement (SEIS), as well as the responsible development of Alaska's oil and gas resources.

Alaska's oil and gas production is held to the highest environmental standards, with extensive protections for local communities and workforces. A barrel of oil produced in Alaska and shipped through the Trans-Alaska Pipeline System (TAPS) is among the most environmentally and socially responsible in the world.

With that said, the Willow Project is anticipated to generate between \$1.3 billion and \$5.2 billion in unrestricted general fund (UGF) revenue for Alaska, 2,000 construction jobs, and 300 permanent positions. These benefits, along with shared federal royalties and property taxes for North Slope communities, make the development of this project a priority for Alaskan lawmakers.

It is worth noting that revenue from oil and gas production currently comprises 46 percent of Alaska's UGF revenue. Thus, healthy throughput in TAPS equates to healthy state services and a higher quality of life for our residents.

The Willow Project will also promote national energy independence by increasing our supply of competitive, domestic oil. The project is anticipated to produce up to 180,000 barrels per day and will keep a key piece of U.S. infrastructure, TAPS, economically viable with a 20 percent increase in throughput.

The Willow NEPA environmental impact statement (EIS) process began in 2018. It has included 5 public comment periods spanning 215 days and 25 public meetings, and the new draft SEIS has been extensively modified with additional surface protections.

We respectfully request that you consider SEIS Alternative E as a path forward for the project, and support the utilization of this available, abundant, and responsibly developed resource for the benefit of Alaskans and the Nation.

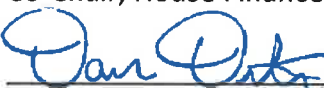
Sincerely,



Representative Louise Stutes
Speaker, Alaska House of Representatives



Representative Kelly Merrick
Co-Chair, House Finance Committee



Representative Dan Ortiz
Vice-Chair, House Finance Committee



Representative Grier Hopkins



Representative Andy Josephson



Representative Calvin Schrage



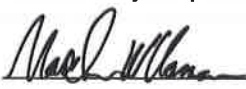
Representative Bart LeBon



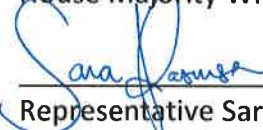
Representative Mike Prax



Representative Chris Tuck
House Majority Leader



Representative Matt Claman
House Majority Whip



Representative Sara Rasmussen



Representative Steve Thompson



Cc: The Honorable Deb Haaland
Secretary, U.S. Department of the Interior

Trade Association Letters of Support

Founded 1975

Executive Director
Leila Kimbrell

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John Sturgeon
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Kristina Woolston

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U.S. Senator Lisa Murkowski
U.S. Senator Dan Sullivan
Governor Michael J. Dunleavy



RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

July 27, 2022

Steve Cohn, State Director
Bureau of Land Management, Alaska
222 W. 7th Avenue, Stop #13
Anchorage, AK 99513-7504

Re: Comments on the Willow Master Development Plan (MDP) Draft Supplemental Environmental Impact Statement (DSEIS); NEPA # DOI-BLM-AK-0000-2018-0004-EIS

Dear State Director Cohn:

The Resource Development Council for Alaska, Inc. (RDC) submits the following comments to the Bureau of Land Management's (BLM) above-referenced document. RDC is a statewide trade association comprised of individuals and companies from Alaska's fishing, tourism forestry, mining, and oil and gas industries. RDC's membership includes Alaska Native corporations, private companies, nonprofit entities, local communities, organized labor, and industry support firms. For 47 years, RDC has advocated for a strong, diversified private sector in Alaska and to expand the state's economic base through the responsible development of our natural resources. The Willow Project is such an example.

RDC encourages the BLM to move forward in finalizing the DSEIS without any further delay or extensions. After many years of rigorous environmental review and analysis, including complying with additional court-ordered review, the DSEIS presents a reasonable alternative that responds to the court's concerns and was developed in coordination with cooperating agencies and stakeholders. The current comment period is adequate time to review limited, new information.

- **Extensive Analysis and Public Input; Court Concerns are Addressed**

Since 2017, RDC has submitted several comments letters and testified in support of the Willow Project. RDC continues to support the project in this current phase of review. The extensive effort and scientific analysis BLM and other cooperating agencies provided culminated in a FEIS and ROD in 2020 approving the Project. BLM's extensive analysis was in cooperation with multiple state, federal, and local cooperating agencies, with extensive stakeholder engagement public hearings, scoping meetings, and consultations. This includes now approximately 215 days of days of public comment (including this current comment period), two public scoping periods, and thirteen in person public meetings held in Anchorage, Fairbanks, Nuiqsut, Utqiagvik, Atkasuk, and Anaktuvuk Pass. (It is important to emphasize this does not count the extensive and numerous efforts the BLM staff engaged in to find new ways to continue to engage the public and progress permitting when the pandemic hit in 2020, including holding virtual meetings to allow public engagement virtually by phone, virtual conferencing, and local radio broadcasts. By some counts, these additional meetings bring the number of public meetings closer to 25.) RDC applauds the extensive efforts of BLM to engage in a thorough, multi-year analysis of the project based in science and supported by the research; however, it is time to bring that process to a close and let the project proceed to development.

This current phase of review, the DSEIS, is the result of a remand decision in August 2021, by the U.S. District Court for Alaska. That remand order, which was not contested by the Project Proponent, identified



121 West Fireweed Lane, Suite 250, Anchorage, Alaska 99503
907-276-0700 • resources@akrdc.org • akrdc.org



specific categories of deficiencies that required additional analysis. In response, this past spring, BLM opened a public scoping period to assess the scope of the additional court-ordered review. RDC submitted comments encouraging BLM to focus solely on the narrow issues identified by the court remand decision. Importantly, multiple other aspects of the 2020 Willow MDP FEIS were unaffected by the court's remand decision. The unaffected parts of the previous environmental review for the Willow Project do not need to be revisited.

Upon initial review of the DSEIS, RDC applauds BLM for maintaining a narrow focus to the court issues and commonsense approach to this years-long, extensive environmental review of the Willow MDP. The DSEIS makes it easy to identify the new analysis and the new "Alternative E: Three-Pad Alternative (Fourth Pad Deferred)" ("Alternative E") developed in direct response to the court order. The current comment period is more than adequate to review the limited new information and comment. Further delay will only add to additional, unnecessary costs and cause potential loss of another valuable construction season.

Alternative E reduces the scope, and consequently, the footprint and impact of the project. In several ways, this addresses many concerns most often expressed by Project opponents. First, it reduces and realigns the number of drilling sites (from 5 down to 4, but only 3 would be approved as currently proposed in the DSEIS). Alternative E further reduces the amount of roads, both gravel and ice, needed for the Project, which also reduces freshwater usage; reduces the amount of infield pipelines; realigns the Project to avoid yellow-billed loon buffer zones; and reduces the length of airstrips needed. Most of these reductions take place in or near the Teshekpuk Lake Special Area (TLSA); again, an area of most concern to opponents. Additionally, in its updated analysis of greenhouse gas (GHG) emissions as part of the Climate and Climate Change analysis and in response to the court's remand order, the DSEIS concludes Alternative E has the lowest overall GHG impacts than any other previously considered action alternative based on current U.S. standards for modeling GHG impacts. The DSEIS adequately addresses both the direct and indirect as well as cumulative GHG impacts of the Project. Further review concludes cumulative impacts on coastal subsistence communities is expected to be low. Overall, proposed Alternative E reduces the footprint and surface infrastructure of the project within TLSA presenting a reasonable path forward supported by BLM's environmental analysis. The DSEIS directly addresses the court's concerns.

- **The Willow Project Brings Economic and Energy Independence for All**

RDC understands that Alternative E was developed by BLM together with cooperating agencies and stakeholders as a compromise to address the court's concerns. Key stakeholders for this project include Alaska Native individuals, communities, and entities of Alaska's North Slope region. The project falls within the North Slope Borough (NSB), whose territory includes the NPR-A. Key villages within the NSB include Nuiqsut, Utqiagvik, Point Lay and Wainwright. Other key Alaska Native entities include the Inupiat Community of the Arctic Slope (ICAS), the Arctic Slope Regional Corporation (ASRC), the Alaska Native regional corporation for the North Slope established pursuant to the Alaska Native Claims Settlement Act of 1971 (ANCSA). Representing more than 10,000 Alaskans and Alaska Native individuals, these stakeholders overwhelmingly support the Willow Project. RDC encourages BLM to give all due respect to the cultural and economic arguments, including subsistence concerns, set forth in a joint letter by ICAS, ASRC, and the NSB dated July 21, 2022, and that was recently submitted to the public record for this Project.

The Willow Project is in the National Petroleum Reserve-A (NPR-A), a 23-million acre reserve specifically set aside by Congress in 1923 for its petroleum value to ensure American energy independence. The NPR-A is larger than the state of Maine and the Willow Project represents just a small fraction of that area. With Alternative E, that fraction becomes even smaller. The Willow Project will provide key economic investment at all levels of government, as well as the private sector. The Willow Project is estimated to contain as much as 600 million barrels of oil and peak daily production could exceed 180,000 barrels per day over a thirty-year period. This production would substantially boost throughput in the Trans-Alaska Pipeline System (TAPS), running at times one-fourth of its capacity, and will extend the life of TAPS for decades to come. It is estimated the Project will provide nearly \$9 billion in economic benefits through federal, state, and local government royalties and revenues from production, as well as property and income taxes. More than 2,000 construction jobs will be created, including 300 long-term jobs in Alaska. Clearly, Willow production will help fulfill the primary purpose of the NPR-

A, which is to develop American energy resources. It is paramount that BLM provide access to prospects in this region with the highest potential as Congress intended.

In closing, after several years of rigorous environmental review, extensive regulatory assessment, court review, and supplemental analysis, it is time to permit this project. The science-backed data supports the conclusion that the Willow Project is an environmentally and socially responsible resource development project. With its smaller footprint, this Project will also play a critical role in the clean energy transition. RDC encourages BLM adopt Alternative E and permit the Project without further delay.

Sincerely,



Leila Kimbrell
Executive Director



121 W. Fireweed Lane, Suite 207
Anchorage, AK 99503-2035
Phone: (907) 272-1481 Fax: (907) 279-8114
Email: moriarty@aoga.org
Kara Moriarty, President & CEO

July 21, 2022

Ms. Stephanie Rice
BLM Project Manager
Bureau of Land Management
222 W. 7th, Stop #3
Anchorage, AK 99513

Comments submitted electronically:
eplanning.blm.gov/eplanning-ui/project/109410/530

To Whom It May Concern:

The Alaska Oil & Gas Association (AOGA) is a professional trade association whose fourteen member companies account for most of the oil and gas exploration, development, production, transportation, and refining activities in Alaska. As Alaskans, we advocate for the long-term viability of the industry in our state.

On July 8, 2022, the Bureau of Land Management (BLM) issued a Supplemental Environmental Impact Statement (SEIS) for the Willow project with comments due August 29, 2022. Normally, AOGA's comments are submitted at the end of the comment period, but this time, it is important for our voice to be heard earlier in the process.

AOGA has been involved in every step of the regulatory process for this project from the very beginning. After the Willow exploration wells were drilled in 2016, and the discovery was announced in 2017, ConocoPhillips requested the BLM start the environmental review and permitting of this project in May 2018, over 50 months ago. The scoping process for this project started in August 2018 and BLM published the first draft EIS in 2019. After revising the project following stakeholder input, BLM issued a supplement to that draft EIS in 2020.

Following the final EIS and Record of Decision (ROD) in 2020, BLM's decision was challenged in court by environmental organizations, with most of them based outside the state of Alaska. The court vacated the ROD in August 2021 based on a limited number of issues. As BLM conducted another environmental analysis to develop this current SEIS, they opened an informal scoping period earlier this year, which opened the fourth round of public comment for this project. This scoping process was not required, but it added another opportunity for the

public to express opinions about Willow, and the response from Alaskan communities, organizations, and governments were overwhelmingly very supportive. It is not common to see such diverse support for an Alaskan project, from residents of the North Star Borough, and the Inupiat Community of the Arctic Slope, to organizations like the Alaska Federation of Natives, Alaska Petroleum Joint Crafts Council (labor unions), Alaska Chamber of Commerce (business), and Associated General Contractors.

To address the concerns raised by the court, BLM developed their own Alternative (Alternative E) which further minimize impacts while allowing needed development to proceed. AOGA supports this alternative as it is a creative solution that reduces the surface impact in the area, especially in the Teshekpuk Lake region.

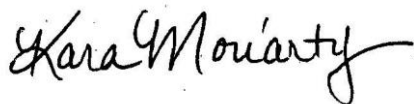
World dynamics have intensified the need for more energy production, especially from America. The additional jobs would also be a boost to Alaska's economy as oil and gas jobs have yet to recover to pre-pandemic levels, and the project will provide significant revenues to the local, state, and federal government.

Before the SEIS was even issued two weeks ago, there were calls to extend the current public comment period. The public had not even seen the report, and some were clamoring for additional time. This is now the fifth public comment period for a project that drilled its first exploration well over six years ago.

Willow is likely one of the most studied and analyzed projects in the country, with extensive opportunity for public engagement. This draft SEIS was rigorously and punctiliously developed by BLM after the court remanded it to them almost 12 months ago. If an extension was granted, it would delay the agency's ability to make a final decision until late in 2022 or early 2023, which means Alaskans would lose out on the jobs and revenues created by a construction season in 2023.

AOGA strongly encourages the BLM to adopt Alternative E and issue a final EIS and ROD in a timely manner and urges the BLM to not extend the current comment period.

Sincerely,



Kara Moriarty
President/CEO



February 2, 2021

The Honorable Deb Haaland
Secretary Nominee
The Department of Interior
1849 C Street, N.W.
Washington, DC 20240

Dear Secretary Nominee Haaland,

As the leading business organizations in the state of Alaska representing over 1,500 companies with approximately 100,000 employees, we are concerned about reports following President Biden's Executive Orders in his first week of office that the Department of Interior intends to review currently issued Environmental Impact Statement (EIS) Record of Decisions (ROD) across the country, including the potential to review the ROD for the Willow Project in the National Petroleum Reserve-Alaska (NPR-A).

The Willow project was designed to meet requirements of the 2013 NPR-A Integrated Activity Plan (IAP), issued by the Obama-Biden Administration, and signed by Secretary Salazar, with stringent requirements for environmental protection. In fact, there are currently roughly 270 mitigation measures and best practices already in place for NPR-A development through the 2013 IAP, which the Willow Project was designed to comply with.

After the Willow Project discovery, the Bureau of Land Management (BLM) was requested to begin the EIS process in May 2018, and the Notice of Intent from DOI was issued in August 2018. The entire EIS process took over two years to complete, with the Record of Decision issued on October 26, 2020. Yesterday, U.S. District Court Judge Sharon Gleason denied in full preliminary injunction motions filed by environmental advocacy organizations in two separate cases challenging the Record of Decision. It is interesting to note that Mayor Harry Brower of the North Slope Borough provided a declaration in support to allow the Willow Project to proceed.

The current EIS ROD for Willow was not an expedited process. Over the course of 26 months, more than

100 public meetings with North Slope stakeholders were held, over 140 days of public comment, with in-person, virtual public meetings, and local radio broadcasts. The final EIS document is over 2,600 pages of detailed analysis.

Based on this thorough public review, and in-depth environmental review, we do not understand the rationale for this potential review of the ROD analysis for Willow. The BLM efforts over the last 2+ years address the issues raised through the public comment process, and the hundreds of stipulations and best management practices the project will be required to follow.

It is our respectful request that the Department of Interior not delay the Willow Project, and not require any additional analysis given the extensive and exhaustive nature of the process used to perform the approved Willow EIS.

The Willow project is very important to the state of Alaska. Alaska's economy has been devastated by the COVID-19 pandemic and there are very few projects, if any in our state, that have the potential to bring over 2,000 construction jobs, with roughly 75% of the installation manhours union labor, and hundreds of long-term jobs. Oil and gas drives over 20% of the Alaskan economy. Many of the companies and their employees represented by the organizations signing this letter depend on the direct, indirect, and induced jobs the oil industry provides, and will suffer economic harm if the Willow project is deferred or cancelled. The project is also slated to bring in significant revenue to federal, state, and local governments which is critical in Alaska's efforts to recover from the pandemic.

Importantly, the Willow Project will also benefit the entire indigenous population of the North Slope region. The BLM estimates the project will generate over \$1.2 billion in property tax to the North Slope Borough alone over the life of the project, and \$2.6 billion for the NPR-A Impact Mitigation Grant Program, under which North Slope communities have the highest priority for use of the funds. These revenues benefit all the communities in the region, supporting schools, emergency response, health clinics, drinking water, wastewater, roads, utilities, and solid waste.

We urge your support for the current ROD and allow the Willow project to proceed as planned and approved.

Respectfully,



Kara Moriarty, President/CEO
Alaska Oil & Gas Association



Kati Capozzi, President & CEO
Alaska Chamber



Deantha Skibinski, Executive Director
Alaska Miners Association



Joe Michel, Executive Director
Alaska Trucking Association



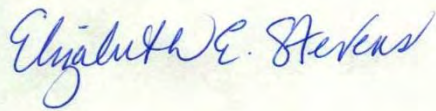
Bethany Marcum, Executive Director
Alaska Policy Forum




Alicia Siira, Executive Director
Associated General Contractors of Alaska



Karen Matthias, Executive Director
Council of Alaska Producers



Elizabeth Stevens
Keep Alaska Competitive



Rebecca Logan, President and CEO
Alaska Support Industry Alliance



Marleanna Hall, Executive Director
Resource Development Council for Alaska, Inc.

CC:

Scott de la Vega, Acting Secretary, Department of Interior
Senator Lisa Murkowski
Senator Dan Sullivan
Congressman Don Young



August 29, 2022

Via Electronic Filing

Steve Cohn, State Director
Bureau of Land Management, Alaska
222 W. 7th Avenue, Stop #13
Anchorage, AK 99513-7504

Re: Bureau of Land Management; Willow Master Development Plan (MDP) Draft Supplemental Environmental Impact Statement (DSEIS); NEPA # DOI-BLM-AK-0000-2018-0004-EIS (July 8, 2022)

Dear State Director Cohn:

The U.S. Chamber of Commerce (“Chamber”) appreciates the opportunity to comment on the Willow Master Development Plan (MDP) Draft Supplemental Environmental Impact Statement (DSEIS) proposed on July 8, 2022.

The Chamber represents members in every sector of the economy who all depend on affordable and reliable energy sources. ConocoPhillips' proposed Willow project, and development of the National Petroleum Reserve – Alaska (NPR-A) generally, represent a crucial addition to U.S. energy security, providing significant additional domestic energy under some of the strictest environmental standards in the world. As such, the Chamber supports the Bureau of Land Management’s (BLM) proposed Supplemental EIS for the Willow project and encourages it to adopt Alternative E without delay.

Energy Security

Development of the Willow project represents a critical opportunity to increase U.S. energy security by adding an additional source of domestic oil production. BLM estimates, Willow will produce an estimated 180,000 barrels of oil per day at its peak. Moreover, throughput for the Trans-Alaska Pipeline System (TAPS) has been declining for over a decade, increasing the risk that it will fall below the required amount necessary to continue operating and supplying oil to the rest of the U.S., especially West Coast refineries. The estimated production rate from Willow will increase the current TAPS throughput by 20% and ensure its long-term viability.

Additionally, Russia’s illegal and unprovoked invasion of Ukraine has diminished the energy security of the U.S. and our allies. Europe and Asia are preparing for a winter heating season with far less Russian energy imports, driving up prices to unprecedented levels and threatening physical supplies of energy commodities. This situation highlights the importance of increased and reliable production of oil and natural gas from the United States as a geopolitical foil to Russia’s use of energy exports in an attempt to undermine global support for Ukraine and its defense. As one of the largest exporters of petroleum in the world, the United States’ ability to facilitate global diversification from Russian energy will be enhanced by the Willow project.

ECONOMIC & ENVIRONMENTAL BENEFITS

BLM's DSEIS estimates development of the Willow project could generate between \$8 and \$17 billion in new revenue for the federal government, the State of Alaska, and communities in and adjacent to NPR-A. BLM further estimates Willow will provide between \$1.3 and \$5.2 billion in State of Alaska revenue from production, property, and income taxes and over \$1.2 billion in North Slope Borough (NSB) revenue from property taxes. Additionally, Willow is expected to create as many as 2,000 jobs during construction.

Global oil markets are expected to remain tight for the foreseeable future, and global oil demand is projected to remain strong in the long term. Oil supply from Willow will provide some of the most technologically advanced and environmentally and socially responsible barrels produced in the world, providing a net reduction in greenhouse gases as it displaces overseas imports with higher greenhouse gas intensity. The International Energy Administration estimates that the methane intensity of oil and gas production in Russia is 30 percent higher than in the United States. Emissions in Iran are 85% higher for each unit of energy produced, and Venezuela is off the charts at 652% higher.¹

TIMELINESS

The Willow project has undergone nearly five years of rigorous regulatory review and environmental analysis, including extensive scientific analysis. The Draft Supplemental Environmental Impact Statement provides a new Alternative (Alt E) developed by BLM and cooperating agencies in consultation with stakeholders in response to the decision in August 2021, by the U.S. District Court for Alaska, remanding BLM's previous DEIS to BLM. Alt E represents a good path forward for the Willow project and significantly reduces surface impacts.

The Chamber supports BLM's effort to narrowly focus the DSEIS on the issues raised by the remand decision. The DSEIS's development of a new "Alternative E: Three-Pad Alternative (Fourth Pad Deferred)" ("Alternative E") directly and adequately addresses the court order. The draft supplemental EIS is extensive and thorough at over 400 pages long.² There has been extensive public involvement, including more than five public comment periods, 215 days of public comment, a public scoping period, and 25 public meetings.

¹ Greater U.S. Energy Production Is Needed to Reduce Reliance on Authoritarian Regimes, Global Energy Institute, Dan Byers, April 5, 2022, <https://www.globalenergyinstitute.org/greater-us-energy-production-needed-reduce-reliance-authoritarian-regimes>

² Willow Master Development Plan, Draft Supplemental Environmental Impact Statement, Bureau of Land Management, July 2022, https://eplanning.blm.gov/public_projects/109410/200258032/20063228/250069410/Vol%201_Willow%20Draft%20Supplemental%20EIS_July%202022.pdf.

Accordingly, the Chamber encourages BLM to finalize the Willow Project without further delay to avoid additional increases to development costs and potentially cause the project to miss loss of another construction season.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Guith". The signature is fluid and cursive, with a large initial "C" and a stylized "G".

Christopher Guith
Senior Vice President
Global Energy Institute
U.S. Chamber of Commerce

Rachel Jones
Vice President
Energy & Resources Policy

August 29, 2022

Ms. Stephanie Rice
BLM Project Manager
Bureau of Land Management
NEPA No. DOI-BLM-AK-0000-2018-0004-EIS
222 W. 7th, Stop #3
Anchorage, AK 99513

Re: Willow Master Development Plan (MDP) Draft Supplemental Environmental Impact Statement (DSEIS); NEPA No. DOI-BLM-AK-0000-2018-0004-EIS

As the nation's largest manufacturing association, the National Association of Manufacturers represents nearly 14,000 small, medium and large manufacturers in every industrial sector and in all 50 states. Manufacturers in America are committed to the communities in which they live and serve, and are dedicated to protecting the health, safety and vibrancy of those communities. Through constant innovation, investment and dedication, manufacturers in the U.S. have become leaders in environmental stewardship and sustainability, while continuing to be the engine that drives the nation's economic growth and prosperity. Today's domestic manufacturing sector is a clean and efficient operation that is technology driven and dedicated to the planet and its people.

Manufacturers and their families are facing record-high energy prices, but it could be far worse if not for domestic energy production. We are working hard to be part of the solution and have urged President Biden and his Administration to take actions to increase domestic energy production to ease some of the strains on the economy and improve the competitiveness of manufacturing in America. Yet we continue to see opportunities missed as projects are canceled and delayed because the Administration fails to follow through on supporting domestic energy production.

Access to reliable, affordable energy is essential for manufacturers to compete in the global marketplace. The NAM supports a diverse approach to powering manufacturing operations, including the responsible development and use of all energy sources, including fossil fuels. There are abundant and reliable oil and natural gas resources in America, and global demand for these resources has continued to increase. For manufacturers, U.S. domestic oil and natural gas supply is a critical component of our energy security. In today's global economy, U.S. manufacturers must be assured of an adequate supply of competitively priced and reliable oil and natural gas industrial and commercial use.

For these reasons the NAM supports ConocoPhillips' Willow project in Alaska. The project will produce up to 180,000 barrels of oil per day and create 2,000 jobs and an additional 300 operating jobs. The U.S. must continue to bolster domestic energy production and the

Leading Innovation. Creating Opportunity. Pursuing Progress.

Willow project presents an environmentally-sound and economically-smart opportunity to do just that. Manufacturers will benefit from domestic energy projects like the Willow project.

This summer BLM issued a Supplemental Environmental Impact Statement for the Willow project in Alaska that builds upon the initial EIS. At the end of this comment period, the Willow project will have undergone 215 days of public comment and 25 public meetings. The NAM urges BLM move quickly to approve this project so that development can begin ahead of the 2022-2023 winter season. Given the extensive environmental reviews the Willow project has already received, the NAM urges BLM to expeditiously evaluate the SEIS within the current comment period and approve this project to support domestic energy security.

The NAM appreciates this opportunity to voice support for the Willow project and implores BLM to promptly approve it. This is a critical opportunity to increase domestic energy production, enhance U.S. energy security and drive down energy prices.

Sincerely,



Rachel Jones
Vice President
Energy & Resources Policy



August 29, 2022

Comments submitted via: <https://eplanning.blm.gov/eplanning-ui/project/109410/530>

Stephanie Rice, Project Manager
Willow SEIS Comments
Bureau of Land Management, Alaska State Office
222 W. 7th Avenue – Stop #13
Anchorage, Alaska 99513

Re: Willow Master Development Plan Draft Supplemental Environmental Impact Statement (“SEIS”), Comments due August 29, 2022.

Dear Ms. Rice:

We are pleased to participate in the 45-day public comment period for the Willow Master Development Plan (“Willow Project”) Draft SEIS, and we submit written comments for your consideration. We appreciate the Bureau of Land Management’s (“BLM”) commitment to meaningful public engagement including extensive opportunities for the public to provide input on the critical energy infrastructure development proposed in the National Petroleum Reserve in Alaska (“NPR-A”).

The American Petroleum Institute (“API”) represents all segments of America’s oil and natural gas industry which supports more than 11 million US jobs and is backed by a growing grassroots movement of millions of Americans. Our approximately 600 members produce, process, and distribute the majority of the nation’s energy, and participate in API Energy Excellence®, which is accelerating environmental and safety progress by fostering new technologies and transparent reporting. API was formed in 1919 as a standards-setting organization and has developed more than 800 standards to enhance operational and environmental safety, efficiency, and sustainability.

With energy costs high for American consumers and European allies looking to the US for access to an affordable and stable energy supply, we urge the BLM to provide regulatory certainty with timely approvals in federal environmental reviews for energy infrastructure projects. Clear, robust, and timely completion of federal reviews for energy infrastructure is vital for ensuring that American producers meet rising demand at home and abroad and continue to provide reliable energy.

Allowing safe and responsible energy infrastructure projects such as the fully-vetted Willow Project to proceed without any further delay, is critical to securing much needed Alaskan energy development and for ensuring overall US energy security.

We provide the following overall comments for your consideration:

- ***Energy Infrastructure Projects are essential for domestic energy security and for meeting global energy demands.*** Overall, responsible, safe, and efficient development and maintenance of vital energy infrastructure projects such as the Willow Project will serve the national interest by providing secure domestic energy supplies for the nation and our wider interests, strengthen our national security, all while being the engines for increased revenues and job creation for US and local Alaskan economies.
- ***Energy Infrastructure Projects contribute to more jobs and increased tax revenues.*** Energy Infrastructure projects provide enormous benefits to the local economies and here, the Willow Project is expected to create as many as 2,000 jobs during construction and an estimated 300 permanent jobs.¹ Another key benefit is that development projects such as this result in significant tax and royalty revenues for local, state, and federal governments providing much needed economic stimulus.² In fact, any delayed timing of a final decision would not serve any public benefit and could hamper access to vital economic opportunities given Alaska's short and limited seasons for construction.
- ***Timely completion and approvals of fully-vetted federal reviews for energy infrastructure projects is crucial for regulatory certainty.*** Energy projects are subject to rigorous federal environmental reviews, and in this case, the Willow Project has undergone comprehensive review process lasting more than four years, with extensive opportunities for public comment.

The BLM scoping process for Willow Project began in 2018 followed by the issuance of a draft EIS the following year. With public input and a SEIS issued, the BLM issued a Final SEIS and a ROD. Following litigation and a court decision that found fault with two discrete areas of the SEIS, BLM conducted an extensive and rigorous review with numerous opportunities for public input. This culminated in the issuance of the Draft SEIS with more opportunities for public input including a 45-day window for written comments as well as opportunities to participate in six public meetings. This extensive review has also included meaningful input from many federal, state, and local governments as well as local communities. The Willow Project located within the NPR-A is consistent with 2022 NPR-A Integrated Plan. Clearly, it is time now to complete the federal review process and to allow the project to proceed expediently.

Any unreasonable delays in key infrastructure projects create regulatory uncertainty and add further obstacles for developing critical investment in American oil and natural gas and associated infrastructure, which provide nearly 70% of our country's energy needs. Such delays would likely have a chilling effect on vital energy projects and long-term investment decisions at a time when harnessing American energy is critical to national security. Overall, this would hamper our ability to address domestic and global energy needs, as well as undoubtedly add further costs to the already-burdened American consumers.

- ***Safe and responsible development of energy resources within the NRA-A including the Willow Project has widespread support amongst the affected communities, including Alaska Natives.***³ As noted by Senators Murkowski and Sullivan, "Alaska Natives are also especially supportive of this project, as it would contribute to

¹ Project description available at: <https://static.conocophillips.com/files/resources/22copa013-willow-fact-sheet-r7-19-12.pdf>

² See for e.g. Draft SEIS, Table 3.15.5 (Summary of State, Federal, and Borough Revenues from the Project),

³ See for e.g. "Alaskans voice strong support for Willow Project." Available at: <https://www.murkowski.senate.gov/press/release/alaskans-voice-strong-support-for-willow-project>



their economic well-being and prosperity for years to come.”⁴ The Senators support this statement with specific references to comment letters from wide-ranging community members including leaders of the Alaska Federation of Natives, Alaska Native Village Corporation Association, and ANCSA Regional Association, as well as the North Slope communities of Utqiagvik, Wainwright, and Atkasuk.⁵

Also, as recently noted by the Inupiat Community of the Arctic Slope (“ICAS”), North Slope Borough, and the Arctic Slope Regional Corporation (“ASRC”) in a comment letter filed with the BLM, “[a]ll actions that unreasonably prohibit, restrict, or delay oil and gas development in our region significantly impact our ability to provide critical services to our people” and that, “loss of economic activity on the North Slope means lost jobs and lost opportunities for people in a region where economic opportunity is generally low, and the cost of living is extremely high.”⁶

We appreciate the opportunity to comment on this matter. Overall, we ask the BLM to remain committed to facilitating federal environmental reviews and permitting in a timely manner, and to move forward with the Willow Project without any further delay, especially given the tremendous public benefits expected from the project. Approval of key infrastructure energy projects such as Willow Project is critical for the safe and clean development of the nation’s vast energy sources and in the long-term, will serve to strengthen US economic and energy security.

Thank you for your time.

Sincerely,

A handwritten signature in cursive script that reads 'Amy Emmert'.

Amy Emmert
Senior Policy Advisor
American Petroleum Institute
200 Massachusetts Ave NW
Washington, DC 20001
(202) 682-8372
Emmert@api.org

⁴ Letter from Senators Lisa Murkowski and Dan Sullivan to U.S. Department of Interior Secretary Debra Haaland, July 15, 2022. Available at: [https://www.murkowski.senate.gov/imo/media/doc/7.15.22%20-%20Alaska%20Delegation%20Letter%20to%20Secretary%20Haaland%20re.%20Willow%20SEIS%20\(003\).pdf](https://www.murkowski.senate.gov/imo/media/doc/7.15.22%20-%20Alaska%20Delegation%20Letter%20to%20Secretary%20Haaland%20re.%20Willow%20SEIS%20(003).pdf)

⁵ *Id.*

⁶ Comment letter filed with the BLM by ICAS, North Slope Borough, and ASRC, July 21, 2022. Available at: https://eplanning.blm.gov/public_projects/109410/200258032/20064382/250070564/ICAS_NSB_ASRC_Willow_Ltr_Sec_Haaland_07_21_2022.pdf