



August 29, 2022

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

RE: Draft Supplemental Environmental Impact Statement for the Willow Project

Dear Ms. Rice and BLM Alaska,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (“Draft SEIS”) for the Willow Master Development Project. [Evergreen Action](#) is a national non-profit helping lead the fight to put bold climate action at the top of America’s agenda, implement an all-out mobilization to defeat climate change, and create millions of good jobs in an equitable clean energy economy.

We are writing to offer public comment on the Draft SEIS and respectfully urge the Bureau of Land Management (BLM) to choose the No Action option (“Alternative A”). In the following pages, Evergreen Action will provide substantive comments on: (1) climate change, including concerns that the Draft SEIS does not adequately analyze the Willow Project’s climate impacts, and (2) social and environmental justice, including concerns that the short 45-day public comment process has created a sizeable obstacle for frontline community members to have their voices heard. Our technical comments follow below:

Part I: Climate Change

I. The Willow Project is incompatible with U.S. climate goals and commitments.

The Willow Project runs counter to our national climate goals and international climate commitments. Last year, President Biden issued EO14008: Tackling the Climate Crisis at Home and Abroad, which sets out economy-wide net-zero emissions by 2050, and President Biden’s Nationally Determined Contribution (NDC), which commits to an economy-wide emission reduction of 50-52% by 2030.¹ The U.S. also rejoined the Paris Agreement, which legally binds

¹ EO14008: Executive Order on Tackling the Climate Crisis at Home and Abroad. The White House Briefing Room. January 27, 2021. For more information see:

parties to limiting global warming to well below 2 degrees Celsius, “preferably 1.5C degrees,” compared to pre-industrial levels.² Moreover, as a party to the United Nations Framework Convention on Climate Change (UNFCCC), the U.S. is bound to uphold this principle of “common but differentiated responsibilities,” a foundational pillar of the international legal regime governing national action on climate change. This principle states that high-income countries, including the U.S., are responsible for taking more responsibility for preventing climate change. The U.S. must prevent climate change by rapidly phasing out oil and gas extraction while facilitating a just transition to a clean energy future. This includes phasing out oil and gas production on public lands and waters, as well as ending the giveaways of these public resources to multi-national fossil fuel corporations.

Evergreen Action was glad to see BLM acknowledge President Biden’s economy-wide target and NDC under the Paris Agreement in Section 3.2.1. Yet the Draft SEIS fails to adequately analyze how the Willow Project is compatible with these national and international goals. In reality, only the “No Action” alternative fits logically with President Biden’s ambitious and critical climate goals and our international commitments.

II. BLM fails to acknowledge or analyze whether approving the Willow Project would be consistent with the scientific imperative to rapidly shift away from fossil fuel production to limit warming to 1.5C.

Evergreen Action notes with serious concern that Section 3.2 of the Draft SEIS (“Climate and Climate Change”) omits well-established scientific context: that new fossil fuel exploration, development, and production must be immediately halted, and existing fossil fuel production must rapidly decline to limit warming to 1.5 degrees Celsius.

In recent years, numerous authoritative reports have found that new fossil fuel development, production, and infrastructure across the globe is not needed, or is even incompatible, with achieving net-zero by 2050 or limiting global warming to 1.5 degrees Celsius. These reports include:

- a. The International Energy Agency (IEA) finds in its landmark report, *Net Zero by 2050*, that, “beyond projects already committed as of 2021, there are no new oil and gas fields approved for development in our [net zero] pathway,” with energy needs met instead through investment in renewables and other clean energy technologies.³
- b. The Intergovernmental Panel on Climate Change (IPCC) finds that, “Without early retirements, or reductions in utilisation, the current fossil infrastructure will emit more greenhouse gases than is compatible with limiting warming to 1.5C. Including the

<https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>

² United Nations Framework Convention on Climate Change (UNFCCC). ‘The Paris Agreement.’ For more information see: <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement>

³ International Energy Agency. (2021). *Net Zero by 2050*. May 2021.

pipeline of planning investments would push these future emissions into the uncertainty range of 2C carbon budgets.”⁴

- c. The UN Environment Programme’s co-authored [Production Gap Report](#) (2021) finds that, “global fossil fuel production must start declining immediately and steeply to be consistent with limiting long-term warming to 1.5C.”⁵ In addition, the authors find that to follow a 1.5C consistent pathway, global economies need to decrease fossil fuel production by approximately 6% per year between 2020 and 2030. When the report was released in 2020, fossil fuel producing nations were planning on an average annual increase of 2%, which by 2030 would result in more than *double* the fossil fuel production consistent with a 1.5C pathway.⁶
- d. In a related vein, Welsby et. al (2021) find that in order to keep global warming below 1.5C, global oil and gas production must decline 3% annually until 2050.⁷
- e. The University of Manchester’s [Production Phaseout Report](#) (2022), published by the Tyndall Center for Climate Change Research, draws an even thicker red-line for new fossil fuel production. The authors find “there is *no* practical emission space within the IPCC’s carbon budget for a 50% chance of 1.5°C for any nation to develop *any new production facilities of any kind*, whether coal mines, oil wells or gas terminals.”⁸
- f. In the same [Production Phaseout Report](#) (2022), the authors find that if the global community is to stand a chance of limiting warming to 1.5 degrees Celsius, the world’s wealthiest ‘producer nations’ – including the United States – must cut their output of oil and gas by 74% by 2030 and achieve complete phase out by 2034.

These expert findings, which have been omitted from the Draft SEIS, provide vital and widely-accepted context: that new fossil fuel production facilities and infrastructure, like the proposed Willow Project, are not needed, and are even utterly incompatible, with limiting warming to 1.5 degrees Celsius. To borrow the words of United Nations Secretary-General António Guterres, “Investing in new fossil fuel infrastructure is moral and economic madness.”⁹

Evergreen Action notes with deep concern that because BLM has omitted these key pieces of literature from the Draft SEIS, it has failed to properly contextualize and analyze the enormous GHG emissions from the Willow Project against a 1.5C pathway, the urgent need to stop all new fossil fuel production, and the power of the federal government and BLM to enable this transition.

⁴ Intergovernmental Panel on Climate Change. (2021). WG III Contribution to the Sixth Assessment Report: Technical Summary. <https://www.ipcc.ch/report/ar6/wg3/>

⁵ Stockholm Environment Institute, IISD, ODI, E3G, UN Environment Programme. (2021). *The Production Gap: 2021 Report*.

⁶ Stockholm Environment Institute, IISD, ODI, E3G, UN Environment Programme. (2020). *The Production Gap: 2021 Report*. https://productiongap.org/wp-content/uploads/2020/12/PGR2020_FullRprt_web.pdf

⁷ Welsby, D., et al. (2021). “Unextractable fossil fuels in a 1.5C world.” *Nature*. September 8, 2021.

⁸ Calverley, D., & Anderson, K. (2022). *Phaseout Pathways for Fossil Fuel Production Within Paris-compliant Carbon Budgets*. Tyndall Center for Climate Change Research. University of Manchester.

⁹ Guterres, A. (2022). “World is ‘fast track to climate disaster,’ says UN secretary general - video.” *The Guardian*. April 4, 2022.

Let us compare these expert findings to Section 3.2.2 of the Draft EIS (“Environmental Consequences: Effects of the Project on Climate Change”). In this section, BLM writes that “...while a single project of this size cannot significantly impact global GHG emissions, all projects may cumulatively have a significant impact on global climate change” (p. 37). This statement accurately states that the proposed Willow Project would cumulatively contribute to global climate change. It fails, however, to acknowledge that a single new fossil fuel project, i.e. the Willow Project, is *not compatible* with a pathway limiting warming to 1.5 degrees Celsius. After all, the University of Manchester’s Tyndall Center [Production Phaseout Report](#) (2022) finds that there is no room in the carbon budget for “any new production facilities of any kind,” including oil extraction like the Willow Project, if we are to stand a 50% chance of limiting warming to 1.5C.¹⁰

While various expert researchers^{11 12} find that global fossil fuel production must decline immediately to be consistent with limiting long-term warming to 1.5C, the Draft SEIS also fails to analyze the Willow Project against global and national fossil fuel production decline pathways. Instead, BLM concerningly notes that the Willow Project is helping maintain an overall status quo fossil fuel production rate that is fueling the climate crisis, writing that the project would “help offset declines in production from the North Slope oil fields...” (p. 1). BLM must provide additional context and in-depth analysis of how the Willow Project will be “offsett[ing]” declines in production, and how this squares with the UN Production Gap Report’s findings that we should be decreasing fossil fuel production by 6% annually.

As such, we note with serious concern that the Draft Supplemental EIS does not adequately analyze the Willow Project against global and national fossil fuel production decline pathways that are necessary to keep our climate below 1.5 degrees Celsius. The Draft Supplemental EIS must not only acknowledge the growing scientific consensus that new fossil fuel infrastructure or production is not needed, or is incompatible, with a 1.5C compliant pathway – but also analyze whether the Willow Project is compatible with a 1.5C future.

III. BLM fails to adequately analyze the significance of the greenhouse gas emissions from the Willow Project.

Evergreen Action appreciates the BLM’s analysis of the climate change impacts associated with the Willow Project, as outlined on pages 34 to 52 of the Draft Supplemental EIS. To summarize these findings, the BLM estimates that the Willow Project would produce up to approximately 629 million total barrels of oil over its 30 or 31-year lifetime (p. 2). The estimates of gross carbon dioxide equivalent resulting from Alternatives B, C, D, and E span a total of 278 to 286.5 million metric tons, including both direct and indirect GHG emissions (Table 3.2.2, p. 41). Put differently,

¹⁰ Calverley, D., & Anderson, K. (2022). *Phaseout Pathways for Fossil Fuel Production Within Paris-compliant Carbon Budgets*. Tyndall Center for Climate Change Research. University of Manchester.

¹¹ Stockholm Environment Institute, IISD, ODI, E3G, UN Environment Programme. (2021). *The Production Gap: 2021 Report*.

¹² Welsby, D., et al. (2021). “Unextractable fossil fuels in a 1.5C world.” *Nature*. September 8, 2021.

over the course of its lifetime, the Willow Project would emit emissions equivalent to the annual emissions of 74 and 77 coal plants.

Viewed in its current form, the BLM's estimates show that the Willow Project would release a significant and dangerous amount of direct and indirect greenhouse gas (GHG) pollution into the atmosphere, fuelling an already rampant climate crisis. Yet Evergreen Action is also concerned that the Draft Supplemental EIS offers an incomplete and inadequate analysis of the Willow Project's climate impacts. As such, the Draft SEIS falls short of obligations under the National Environmental Policy Act (NEPA) to properly contextualize and analyze the enormous GHG emissions that would stem from the Willow Project through a "full and fair analysis."

The Draft SEIS estimates that the Willow Project would result in the annual average total gross GHG emissions to 9.6 MMT CO₂e. Using these estimates, BLM compares the project's annual average *gross* GHG emissions to the annual GHG emissions of the United States (~0.145%) and the project's annual average *direct* GHG emissions to annual Alaska GHG emissions (~1.97%) (see: p. 42). Here, BLM fails to compare the project's annual average *gross* GHG gas emissions to the annual *Alaska* GHG emissions. As pointed out in the coalition technical comments compiled by Trustees for Alaska, this added comparison would provide a more productive analysis of the project's emissions than total U.S. GHG emissions. BLM must correct this omission.

In Section 3.19.4 ("Cumulative Impacts to Climate Change"), BLM contrasts the projected GHG emissions stemming from Willow and other North Slope projects to total U.S. GHG emissions (~0.39%). The Draft SEIS then concludes that the GHG emissions from the Willow Project and other North Slope projects "cumulatively constitute a relatively small fraction of the total impacts from U.S. GHG emissions" (p. 324). Here, BLM fails to explain what emissions figure *would* constitute a significant amount of GHG emissions, and instead arbitrarily diminishes the magnitude these planet-warming fossil fuel projects that are incompatible with a 1.5C pathway.

IV. BLM inadequately analyzes methane emissions from the Willow Project.

The Draft SEIS provides incomplete analysis of projected methane emissions from the Willow Project. Methane is a powerful greenhouse gas that contributes to climate change, over 25 times as potent than CO₂ in trapping heat in our atmosphere.¹³ (Measured over a 20-year period, this ratio balloons to 84-86 times as potent.)¹⁴ In the cumulative impacts analysis, BLM fails to properly account for the compounding release of methane due to increased permafrost melting caused by climate change. Rather concerningly, BLM also does not account for *any* methane emissions that would result from venting. BLM must rectify these omissions.

¹³ <https://www.epa.gov/gmi/importance-methane>

¹⁴ <https://unece.org/challenge>

Part 2: Social Justice

I. The Willow Project is contrary to the Biden Administration’s social justice policies.

On Day 1, President Biden issued EO 13990: Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. As part of this executive order, the administration committed to “promote and protect public health and the environment; and conserve our national treasures and monuments, places that secure our national memory,” as well as “advance environmental justice.”¹⁵ Yet approving the Willow Project – which inflicts environmental injustice, threatens the public health of frontline communities, harms biodiversity, and greenlights extensive urbanization of sensitive Arctic ecosystems – sits in direct opposition to EO 13990. Only “Alternative A: No Action” is compatible with President Biden’s policies.

Evergreen Action expresses deep concern that the Willow Project, if approved, would threaten food security and traditional food sovereignty. Our organization would like to amplify the concerns laid out in the coalition comment letter, co-authored by Trustees for Alaska, which notes that BLM’s Alaska National Interest Lands Conservation Act (ANILCA) Section 810 analysis is flawed. In particular, the analysis does not consider alternatives that would reduce impacts to subsistence, and it omits impacts to North Slope subsistence communities, including whaling impacts. (For more substantial comments, please refer to p. 248 to 256 of coalition technical comments letter, co-authored by Trustees for Alaska and others).

II. Insufficient public participation

Evergreen Action notes with concern that the 45-day comment period for public participation was too short, and this may have impacted the ability of affected communities to meaningfully participate in the public comment process. For example, Mayor Rosemary Ahtuanguaruak, representing the City of Nuiqsut, wrote to BLM asking for a longer comment period on the grounds that BLM’s proposed schedule “conflicts with the community’s subsistence schedule and preparation for the Cross Island whaling efforts.”¹⁶ This was also reflected in the letter of Vice President Eunice Mary Brower of Native Village of Nuiqsut.¹⁷ BLM has not provided sufficient time for frontline communities in Alaska to have their voices heard.

Part 3: Concluding Comments

As the climate crisis sweeps across the country, Evergreen Action is joining hundreds of other organizations in calling for BLM to reject the Willow Project. We cannot afford the enormous

¹⁵ Executive Order on Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis
<https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-protecting-public-health-and-environment-and-restoring-science-to-tackle-climate-crisis/>

¹⁶ Letter from Mayor Rosemary Ahtuanguaruak to Stephanie Rice, dated June 6, 2022. Publicly available on BLM website.

¹⁷ Letter from Vice President Eunice Mary Brower to Stephanie Rice, dated June 14, 2022. Publicly available on BLM website.

greenhouse gas pollution that will be released as a result of burning over 600 million barrels of oil that ConocoPhillip's Willow Project would produce. Approving the Willow Project, or any new Arctic oil development, would be deeply incompatible with our national climate goals, our Paris Agreement commitment to limit global warming to 1.5 degrees Celsius, and the safety of frontline communities.

We respectfully urge the BLM chooses Alternative A: No Action to safeguard our climate, respect local communities, and protect sensitive ecosystems.

Thank you for consideration.

Sincerely,

Mattea Mrkusic
Policy Lead, Evergreen Action
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