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Bureau of Land Management
Attn: Bureau of Land Management
222 West 7th Ave., Stop 13
Anchorage, AK 99513

2019 MAR 14 PM 1:15

RECEIVED



March 13, 2019

Bureau of Land Management
Attn: Coastal Plain Oil and Gas Leasing Program EIS
222 West 7th Ave., Stop #13
Anchorage, AK 99513

Re: Cook Inlet Region, Inc. comments to the Arctic National Wildlife Refuge Coastal Plain Draft Environmental Impact Statement

To whom it may concern:

The following comments are submitted on behalf of Cook Inlet Region, Inc. (CIRI), an Alaska Native Regional Corporation formed under the Alaska Native Claims Settlement Act of 1971 (ANCSA) to benefit Alaska Natives with ties to the Cook Inlet region. CIRI is the largest private landowner in Southcentral Alaska, with more than 1.3 million acres of subsurface estate and large surface estates shared between CIRI and its seven village corporations.

In response to the December 20, 2018 release of the Coastal Plain Oil and Gas Leasing Program Draft Environmental Impact Statement (DEIS), CIRI expresses general support for environmentally responsible resource development throughout the State of Alaska and specific support for the Bureau of Land Management's (BLM) oil and gas leasing program in the Coastal Plain pursuant to Section 20001 of Public Law 115-97 (Dec. 22, 2017). CIRI appreciates recognition of important subsistence and cultural resources in the program area and the BLM's extensive environmental analyses conducted in furtherance of the DEIS.

More specifically, CIRI has the following comments:

Alternative B appears to best satisfy the intent and letter of the Tax Cuts and Jobs Act (Tax Act), wherein Congress required the Department of Interior, through the BLM, to "establish and administer a competitive oil and gas program for the leasing, development, production, and transportation of oil and gas in and from the Coastal Plain."¹ BLM may later decide that certain areas of the program area should be unavailable for leasing or surface disruption. However, to administer a 'competitive' program and to operate such a program with the greatest amount of information, it would be prudent to consider the entirety of the baseline area.

Although CIRI supports Alternative B, we do so with two caveats. First, CIRI encourages the BLM to consult with Arctic Slope Regional Corporation (ASRC) and local stakeholders

¹ Sec. 20001(b)(2) of 115 P.L. 97

to assess whether Alternative B would benefit from altering lease stipulations related to subsistence resources and environmental considerations related thereto. For example, given ASRC's experience with caribou resources in and around oil and gas development on the North Slope and understanding that caribou provide an important subsistence resource to people in the affected region, CIRI generally encourages the BLM to consider ASRC's comments to the DEIS as they relate to caribou.

Secondly, the Tax Act states that "(t)he Secretary shall issue any right-of-way or easements across the Coastal Plain for the exploration, development, production, or transportation necessary to carry out this section." Shall is an unequivocal mandate to provide for transportation necessary; however, Alternative B, Lease Stipulation 1 states that "essential pipeline and road crossings" will be permitted on a case-by-case basis, which may present ambiguity to an operator. A potential lessor is provided no certainty that their lease would be perfected. The BLM is encouraged to provide additional processes and guidance that would provide assurance to lessors that their lease investments would be developable.

In the Tax Act, Congress required the management of the Coastal Plain oil and gas program to be administered similarly to the program under the Naval Petroleum Reserves Production Act of 1976.² The State of Alaska has benefitted from 40 years of environmentally responsible and economically significant oil production on the North Slope where collaboration between Alaska Natives, local stakeholders, governmental agencies, and industry informs development and mitigation measures to protect wildlife and subsistence resources as well as the environment. Moreover, the investment in and reliance on technological advancements on the North Slope has significantly contracted the physical footprint of oil and gas development over the years. CIRI believes the oil and gas leasing program in the Coastal Plain would have a sound foundation if the BLM, among other things: engages in close collaboration and consultation with Alaska Native Tribes and Alaska Native Corporations; informs decisions with both western science and traditional knowledge; applies mitigation measures similar to those employed across the North Slope; continues to engage and consult with the State of Alaska Department of Fish and Game; and encourages technological evolution to occur.

CIRI supports the BLM's NEPA process. The development of an oil and gas leasing program in the Coastal Plain could not only be an economic boon to our State but could also significantly strengthen our nation's energy security. We appreciate the opportunity to provide comments and look forward to continued consultation, as appropriate.

Sincerely,

Cook Inlet Region, Inc.



Sophie Minich
President and CEO

² Sec. 20001(b)(3) of 115 P.L. 97