

U.S. House of Representatives
Committee on Natural Resources
Washington, DC 20515

October 29, 2019

Racheal Jones, Project Lead
Alaska State Office
Bureau of Land Management
222 West Seventh Avenue – Mailstop 13
Anchorage, Alaska 99513

Dear Ms. Jones:

We are writing to express our reservations with the Willow Master Development Plan (Willow Plan) Draft Environmental Impact Statement (DEIS), and object to the limited timeframe provided to the public to comment. We are concerned that the substantial scope of the Willow Plan will have serious ecological and cultural impacts on Alaska's Western Arctic slope, and far-ranging climate impacts, which the Bureau of Land Management (BLM) did not adequately consider in the DEIS.

The Willow Plan is a complex and extensive infrastructure proposal that is likely to have significant impacts on the surrounding area and entire National Petroleum Reserve-Alaska (NPR-A or Reserve), particularly on the Teshekpuk Lake Special Area. As stated in the DEIS, the development will include five drill pads with up to fifty wells each, a central processing facility and operations center, nearly forty miles of gravel roads, an eight-acre artificial island in the Beaufort Sea, nearly 700 miles of ice roads, one to two airstrips, and 336 miles of pipelines. All told, this development will directly affect nearly one million acres of Arctic lakes, ponds, rivers, floodplains, wetlands, uplands, and coastline that are home to globally significant migratory bird populations, caribou, and polar bears, among numerous other important species. In addition, the proximity of the project to the community of Nuiqsut and the potential adverse impacts of the project on subsistence resources and cultural activities are gravely concerning.

BLM must consider the impacts of the Willow Plan in the context of the NPR-A's Integrated Activity Plan (IAP). The IAP closed the majority of the Teshekpuk Lake Special Area—one of the most productive wetland complexes in the Arctic, an important calving ground for the Teshekpuk Lake Caribou Herd, and home to vital nesting habitat for hundreds of thousands of migratory birds from all seven continents—to leasing and other development activities. Unfortunately, the Willow Plan proposes construction of roads, pads, and pipelines within the Teshekpuk Lake Special Area, threatening the valuable resources the Special Area was established to protect.

The sheer scale of industrial infrastructure contemplated by the Willow Plan should also be considered in the context of other nearby development projects in the NPR-A and the Trump administration's proposed revisions to the IAP in order to expand areas available for oil and gas

leasing. The speed of development in and adjacent to the Reserve is staggering, including industrial activities associated with the Greater Mooses Tooth Unit, Harrison Bay, and nearby state lands.

Finally, we object to the limited timeframe provided to the public to comment on the DEIS. The BLM posted the DEIS to its planning website in the afternoon of Friday, August 23, without any announcement in the Federal Register, and with a comment period only extending through mid-October. The Native Village of Nuiqsut, the North Slope Borough, and environmental organizations all requested a two-month comment extension period to ensure meaningful participation, but only two weeks were granted. Given the complexity of the issues and thousands of pages contained within the DEIS, and the overlap with several other comment periods for Arctic infrastructure projects, it is questionable whether the BLM has met its National Environmental Policy Act obligations to provide robust participation by the interested public.

The Willow Development Plan is a continuation of the Trump administration's reckless push to sell off America's Arctic for oil and gas development without any regard for the harm development will cause to this extraordinary, globally important region or the people who live there.

Thank you for your attention to these comments.

Sincerely,



Raúl M. Grijalva
Chair
House Committee
on Natural Resources



Alan Lowenthal
Chair
Subcommittee on Energy
and Mineral Resources



Jared Huffman
Chair
Subcommittee on Water,
Oceans, and Wildlife