

North Slope Borough

OFFICE OF THE MAYOR

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Harry K. Brower, Jr., Mayor

May 4, 2020

BLM Alaska State Office
Attn: Racheal Jones, Project Manager
222 West 7th Avenue, #13
Anchorage, AK 99513

Submitted via USPS mail and electronically at www.blm.gov/alaska/comment123

RE: Willow Master Development Plan Supplement to the Draft

Dear Ms. Jones,

The North Slope Borough (Borough) appreciates this opportunity to provide comments to the Bureau of Land Management (BLM) for the Willow Master Development Plan Supplement to the Draft. The Borough supports ConocoPhillips Alaska, Incorporated's (CPAI) proposed development plan for the Willow prospect because it will benefit our communities through property taxation and through the National Petroleum Reserve - Alaska Impact Mitigation Grant Program. We thank CPAI for undertaking this additional NEPA process review in response to the concerns of our communities and support the new module delivery option, Option 3, the Colville River Crossing.

Preferred Alternative

The Borough continues to support Alternative B because having roads between all the Willow drill sites and connecting Willow to the Greater Mooses Tooth unit will reduce air traffic, improve emergency response, safety and community access. Air traffic is one of the primary concerns, if not the primary concern, from our residents and subsistence hunters concerning oil and gas development because of its impacts on caribou movements and subsistence harvests. Therefore, minimizing flights must be prioritized over limiting ground infrastructure. Alternative B will also allow residents access to additional roads for subsistence and recreation purposes. These roads may also assist in the annual construction of the Community Winter Access Trail between Nuiqsut and Barrow.

We encourage BLM and CPAI to allow local residents access to the Willow project's roads. CPAI should allow residents to utilize the Willow project's roads for subsistence purposes and produce concise policies regarding the use of its roads for subsistence purposes. We also encourage BLM and CPAI to work closely together on designing and implementing vehicle pullout pads and subsistence ramps that allow free passage and subsistence access. These pullouts and ramps will help mitigate the impacts of Willow on subsistence.

Colville River Crossing Module Delivery Option

We support the Colville River Crossing (Option 3) for module delivery because this option will limit the project's impacts to Bowhead whales and other marine resources. Module delivery options 1 and 2 require the construction of gravel islands. We are concerned that the construction of a module transfer island, and related ocean vessel traffic under options 1 and 2, could impact the migration of bowhead whales and other marine mammal species. Moreover, the construction of gravel islands would expend limited gravel resources in the area.

Subsistence Boat Ramps

We appreciate CPAI's willingness to construct up to three boat ramps for local residents to use as mitigation for project related impacts. Please work with local residents and entities to identify the best locations and the best designs for these boat ramps. The construction of boat ramps and other subsistence infrastructure should also be coordinated with Oil Search LLC., who may be constructing a subsistence boat ramp for its Nanushuk Project.

Conclusion

Thank you for the opportunity to comment on the Willow Master Development Plan Supplement to the Draft.

Sincerely,

A handwritten signature in blue ink that reads "Harry K. Brower, Jr." in a cursive script.

Harry K. Brower, Jr.
Mayor

Site Specific Comments

P. 19 3.8.2.1.2 In-Water Structures

This section notes that work “could super cool (sic) the water . . .” Please provide approximate temperatures and address the prevention of supercooling of freshwater fish from freezing. Also, how will monitoring of fish take place during supercooling?

P. 28, 3.10.1

“Overwintering habitat depicted in this figure was derived from Morris (2003), (sic) and likely overestimates overwintering habitat in some areas.”

1. How was “overestimation” determined? 2. Define “some areas.”

P. 31

The phrase “resistant fish” is in bold, and it states that only resistant fish are present from DSP2 to Itkillik River; however, in figure 3.10.1, there is no indication that this area has been examined, otherwise the symbol for resistant fish would be used, as it is in other others on this map. Please clarify and cite sources.