



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
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