

**H.R. 8802, “PUBLIC LANDS AND
WATERS CLIMATE LEADER-
SHIP ACT OF 2022”**

LEGISLATIVE HEARING

BEFORE THE

SUBCOMMITTEE ON ENERGY AND
MINERAL RESOURCES

OF THE

COMMITTEE ON NATURAL RESOURCES
U.S. HOUSE OF REPRESENTATIVES

ONE HUNDRED SEVENTEENTH CONGRESS

SECOND SESSION

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**LEGISLATIVE HEARING ON H.R. 8802, TO
REQUIRE THE SECRETARY OF THE
INTERIOR AND THE CHIEF OF THE FOREST
SERVICE TO ALIGN MANAGEMENT OF PUB-
LIC LANDS AND WATERS WITH THE PRESI-
DENT’S GREENHOUSE GAS EMISSION
REDUCTION GOALS, AND FOR OTHER PUR-
POSES, “PUBLIC LANDS AND WATERS
CLIMATE LEADERSHIP ACT OF 2022”**

**Tuesday, September 20, 2022
U.S. House of Representatives
Subcommittee on Energy and Mineral Resources
Committee on Natural Resources
Washington, DC**

The Subcommittee met, pursuant to notice, at 11:01 a.m., in room 1334, Longworth House Office Building, Hon. Alan S. Lowenthal [Chairman of the Subcommittee] presiding.

Present: Representatives Lowenthal, Porter, DeGette, McCollum, Huffman, Dingell, Grijalva, Peltola; Stauber, Graves, and Tiffany.

Dr. LOWENTHAL. The Subcommittee on Energy and Mineral Resources will come to order.

Good morning, everyone. To everyone who is joining us in person and remotely, welcome to the Subcommittee. I had really hoped and planned on chairing the Subcommittee in person, but yesterday I spent a significant amount of time with a colleague who tested positively for COVID-19 this morning.

[Audio malfunction.]

Mr. STAUBER. Mr. Chair, we are having trouble hearing you with your microphone. It is in and out; I am not sure what is wrong.

Dr. LOWENTHAL. What can I do about that?

Hello? Can you hear me now?

Mr. STAUBER. You are very faint.

Dr. LOWENTHAL. I will make it louder. Can you hear me now?

Mr. STAUBER. Yes, that is better.

Dr. LOWENTHAL. OK. Good morning, everyone joining us in person and remotely. I planned on being with everyone in the hearing room this morning. But unfortunately, yesterday I spent a significant amount of time with—

Ms. DEGETTE. Mr. Chairman, your microphone is still not working correctly.

[Pause.]

Dr. LOWENTHAL. All right. If it is not working, I am going to change it to this one. Let’s see if this one is any better. Give me a second.

[Pause.]

Dr. LOWENTHAL. All right. Can you hear me now?

Mr. STAUBER. That sounds good.

Ms. DEGETTE. Much better, Mr. Chairman.

Dr. LOWENTHAL. Thank you. All right. We are going to try this again. I am just getting the hang of this. So, the Subcommittee on Energy and Mineral Resources will come to order.

Good morning to everyone for joining us, both in person and remotely. Welcome to the Subcommittee.

I was really looking forward to being in the Subcommittee room this morning with everyone. But yesterday, I spent a significant amount of time directly with a colleague who this morning tested positive for COVID-19. So, I think, out of an abundance of caution, and hoping not to be infected myself and also not wanting to potentially pass it on to anyone else, I am going to do this remotely.

First, Ranking Member Stauber, it is great to see you again. Thank you for attending our hearing on offshore wind in Morro Bay. I thought it was a very informative hearing.

The Subcommittee today is meeting to hear testimony on Chairman Grijalva's bill, H.R. 8802, which is the Public Lands and Waters Climate Leadership Act of 2022, of which I am a co-sponsor.

Under Committee Rule 4(f), any oral opening statements at the hearings are limited to the Chair and the Ranking Minority Member, or their designee. This will allow us to hear from the witnesses sooner and help Members keep to their schedule.

Therefore, I ask unanimous consent that all other Members' opening statements be made part of the hearing record if they are submitted to the Clerk by 5 p.m. today, or at the close of the hearing, whichever comes first.

Hearing no objection, so ordered.

Without objection, the Chair may also declare a recess, subject to the call of the Chair.

As described in the hearing notice, statements, documents, or motions must be submitted to the electronic repository at HNRCDocs@mail.house.gov. Members physically present should provide a hard copy for staff to distribute by e-mail.

Please note that Members are responsible for their own microphones. As with our fully in-person meetings, Members can be muted by staff only to avoid inadvertent background noise.

Finally, Members or witnesses experiencing technical problems, like I have, should inform the Committee staff immediately, which I believe I did.

With that, I am going to begin my opening statement.

STATEMENT OF THE HON. ALAN S. LOWENTHAL, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF CALIFORNIA

Dr. LOWENTHAL. Earlier this month, my home state of California experienced one of the worst heat waves ever recorded. Over the past year, we have seen devastating floods, which have washed through Appalachia. We have seen massive wildfires rage across the West. We have seen extreme droughts, which have reduced water levels to dangerous and record-breaking lows.

The climate crisis is here, and it poses an existential threat to American life as we know it now. Our economy, our national security, and the health and well-being of all people, wildlife, lands, oceans, and future generations are at stake.

Thankfully, under the leadership of the Biden administration, we have made progress over the past 2 years. Earlier in his term, the President set aggressive but necessary emissions reduction targets. To stave off the worst impact of climate change, we need to reduce greenhouse gas emissions from 2005 levels by at least half by 2030. We must achieve 100 percent carbon-free electricity by 2035, and the entire U.S. economy needs to reach net-zero emissions by mid-century.

Reaching these targets will, without a doubt, necessitate an all-of-government approach. We need to transform our transportation sector, our industries, our buildings, how we produce food, and, of course, how we generate electricity.

And we are well on our way; Congress has worked with the Biden administration to achieve major policy victories and invest in clean energy, conservation, and environmental justice communities. Just this Congress, we have enacted the Infrastructure Investment and Jobs Act; the CHIPS and Science Act; and the Inflation Reduction Act, which is the most significant climate law in U.S. history.

The Office of Management and Budget estimates that, because of the Inflation Reduction Act's investment, America is on track to reduce greenhouse gas emissions by 40 percent by the year 2030. That is incredible progress, but we still need to implement these laws and reduce our emissions even further.

Luckily, our public lands and waters can help. Historically, these lands have accounted for nearly a quarter of all of U.S. annual carbon emissions because of the massive amount of coal, oil, and gas extraction they support.

While Democrats on this Committee recognize this for the problem and the challenge that it is, we also see the opportunity for our public lands and oceans to be part of the solution to climate change.

H.R. 8802 requires the Interior Department and the Forest Service to take the next step in combating climate change by aligning our public lands and waters with the Biden administration's ambitious emission reduction goals. Chairman Grijalva's bill prohibits new fossil fuel leasing and permitting until the Interior Secretary demonstrates that emissions from additional oil, gas, and coal development are consistent with the Biden administration's 2030, 2035, and 2050 climate targets.

The Department of the Interior has a duty to the public to demonstrate whether fossil fuel development on U.S. public lands and waters is undermining the country's climate goals.

H.R. 8802 ensures the Department lives up to this responsibility, so that Congress and all Americans can stay informed by the Administration's progress. This bill requires DOI and the Forest Service to develop, publish, implement, and regularly update a Greenhouse Gas Emissions Reduction Strategy. This requirement will result in the development of an energy plan for our public lands that deals with the threat of climate change.

For months, my Republican colleagues have called for the Biden administration to develop a comprehensive strategy for our shared energy challenges. This bill would require just that.

Our public lands and oceans can and must be a solution to climate change. But right now, they are still a substantial source of carbon pollution.

H.R. 8802 advances a long-term approach to managing oil, gas, and coal development over the coming years in a manner that helps us transition toward a clean energy future and stave off climate disaster.

I thank Chair Grijalva for introducing this bill, and I am looking forward to today's discussion.

[The prepared statement of Dr. Lowenthal follows:]

PREPARED STATEMENT OF THE HON. ALAN S. LOWENTHAL, A REPRESENTATIVE IN
CONGRESS FROM THE STATE OF CALIFORNIA

Earlier this month, my home state of California experienced one of the worst heat waves ever recorded.

Over the past year, we've seen devastating floods wash through Appalachia, massive wildfires rage across the West, and extreme droughts reduce water levels to dangerous and record-breaking lows.

The climate crisis is here, and it poses an existential threat to American life as we know it. Our economy, national security, and the health and well-being of all people, wildlife, lands, oceans, and future generations are at stake.

Thankfully, under the leadership of the Biden administration, we've made progress over the past 2 years.

Early into his term, the President set aggressive but necessary emissions reduction targets.

To stave off the worst impacts of climate change, we need to reduce greenhouse gas emissions from 2005 levels by at least half by 2030. We must achieve 100 percent carbon-free electricity by 2035, and the entire U.S. economy needs to reach net-zero emissions by midcentury.

Reaching these targets will, without a doubt, necessitate an all-of-government approach.

We need to transform our transportation sector, our industries and buildings, how we produce food, and of course, how we generate electricity.

And we are well on our way.

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And so that Congress and all Americans can stay informed of the administration's progress, the bill requires DOI and the Forest Service to develop, publish, implement, and regularly update a greenhouse gas emissions reduction strategy.

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I thank Chair Grijalva for introducing this bill, and I look forward to today's discussion.

Dr. LOWENTHAL. With that, I now recognize Ranking Member Stauber for his opening statement.

STATEMENT OF THE HON. PETE STAUBER, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF MINNESOTA

Mr. STAUBER. Thank you very much, Chairman Lowenthal. It is hard to believe that this is likely our last Energy and Mineral Resources hearing before November.

Again, I want to thank you, Mr. Chair, for inviting me and our staff members a couple of weeks ago to Morro Bay, California for an insightful hearing on the possibilities of and challenges facing offshore wind.

Today, we are holding a legislative hearing on recently introduced legislation that triples down on the Democrat policies that sent energy prices sky-high for Americans.

In the first hours of this Administration, Joe Biden banned oil and gas leasing in our Federal waters and killed the Keystone XL Pipeline, starting a domino effect that made this past summer the most expensive driving season in memory, and now promises a cold, expensive winter.

The number of executive orders from on high also set out unrealistic and unachievable emissions standards straight out of the playbook of radical, anti-American energy groups, where the United States is supposed to reduce emissions by more than 50 percent by 2050. And today, H.R. 8802 literally bans the Forest Service Chief and the Interior Secretary from leasing until those arbitrary targets are met.

You heard me right. Democrats right here and now are again proposing to ban oil and gas development at a time when energy prices are higher than they have ever been. And demand for energy will rise in both the short and long term.

In the short term, Minnesotans are already preparing for a long, cold, and expensive winter. Sixty-six percent of homes in Minnesota are heated with natural gas furnaces. Home energy prices, and especially natural gas, are way up. And don't take my word for it,

ask anyone from northern Minnesota who is seeing their energy bills skyrocket while the temperatures plummet well below zero.

To my Democrat colleagues here, it might be easy to say, “hey, just throw on a sweater and turn down the thermostat a degree or two.” In my district, affording your energy bill is a quality-of-life issue. My constituents don’t deserve to be punished for heating their homes this winter because congressional Democrats and Joe Biden want to appease their radical, anti-American energy base and further choke our domestic oil and gas production.

In the long term, the Energy Information Administration estimates that energy demand will increase by 50 percent by the year 2050. Therefore, Democrats on this Committee are moving legislation that further restricts our development when a non-partisan energy tracking database projects huge spikes in energy demand.

Instead, let’s take a moment on the Subcommittee and acknowledge reality. The United States of America has led the world in reducing emissions, and it is not even close. And we did so with the proliferation of natural gas development for utility-scale use. Our emissions, in fact, declined during President Trump’s tenure, when we became a net exporter of oil and gas.

My point here is that we can reduce emissions and produce American energy to meet our needs and keep up a high quality of life.

And last, this bill conflicts with the requirements in current law. The bill clearly states that it “shall not preempt or alter other requirements for lease sales and fossil fuel permits.”

On the other hand, the Mineral Leasing Act clearly requires onshore, quarterly lease sales. And the misnamed Inflation Reduction Act prevents the Department of the Interior from issuing new leases for other energy technologies, unless recent oil and gas lease sales have been held.

This is an unserious bill. Clearly, Democrats need to toss a bone to their most radical, anti-American energy supporters after holding their noses and voting with Senator Manchin. So, this is what we have today. And it is, therefore, disappointing to me that renewable industry groups are playing along and offering support for unserious legislation.

We do hope to work together with these organizations in the near future on issues like streamlining transmission regulations. But this, admittedly, is not inspiring.

In closing, this Administration has set out from day one by executive fiat to ban domestic energy production, and they have succeeded as the Administration has leased the fewest acres since World War II.

[Chart.]

Mr. STAUBER. And that is behind me.

And what is the result? Skyrocketing energy prices, crippling inflation, and expensive and cold winters.

To address these crises, Democrats in Congress introduced legislation codifying these Biden failures into law.

I, therefore, look forward to exposing this for what it is, this hearing. And I look forward to the witness testimony.

Mr. Chair, I yield back.

Dr. LOWENTHAL. Thank you, Ranking Member Stauber. Now I am going to introduce today's witnesses.

Dr. Andrew Dessler is a professor of atmospheric sciences and the Director of the Texas Center for Climate Studies at Texas A&M University.

I am going to now yield to Congresswoman Peltola to introduce our next witness.

Mrs. PELTOLA. Thank you, Subcommittee Chair Lowenthal. Good morning, thank you for the opportunity to introduce one of Alaska's community leaders.

This is just my seventh day on the job, and I am finding my calendar has 25 hours of meetings and events stuffed into a 24-hour day. I am so sorry for appearing before you and your Committee by video today.

As the Subcommittee hears H.R. 8802, the Public Lands and Waters Climate Leadership Act of 2022, you will hear heartfelt testimony from Rosemary Ahtuanguaruak, the Mayor of Nuiqsut, a community of about 500 people. Mayor Ahtuanguaruak cares deeply about everyone in the community, their culture, their access to traditional subsistence foods, and most certainly their health.

She is a graduate of the University of Washington Physician Assistant Program and received an honorary doctorate from Oberlin College in recognition of her work addressing health impacts within her community from development.

She also shares her knowledge far beyond Nuiqsut and the state by serving on the Environmental Protection Agency's Clean Air Act Advisory Committee. And while the Mayor and I may disagree on some issues of oil and gas development in the area, I wholeheartedly agree with her commitment to protecting her people, the lands, and the wildlife so essential to Nuiqsut, as does the oil and gas industry that operates on Alaska's North Slope.

I believe we can do both, protecting our communities while responsibly producing the oil that is so important to our state and so important to the nation, including the proposed Willow Project.

Nuiqsut is about 18 miles south of the Colville River headwaters at the Beaufort Sea. The river delta has traditionally been a gathering and trading place for the Inupiat people and a productive source for subsistence hunting and fishing. Knowing how important subsistence foods are to the residents, I thank the Mayor for her dedication to ensuring the healthy life of her community.

I am honored to have been able to introduce Mayor Ahtuanguaruak today, and I look forward to working with her in the future, and with the Subcommittee, to ensure Alaska communities can prosper safely, as they have done for generations, and I expect that they will continue to do for generations to come.

Thank you, Mr. Chairman.

Dr. LOWENTHAL. Thank you, Congresswoman Peltola.

Our third witness is Ms. Abigail Ross Hopper, the President and CEO of the Solar Energy Industries Association.

And our fourth witness will be Mr. Kenny Stein, who is the Policy Director for the Institute for Energy Research.

Let me remind the witnesses that under our Committee Rules, they must limit their oral statements to 5 minutes, but that their entire statement will appear in the hearing record.

When you begin, the timer will begin, and it will turn orange when you have 1 minute remaining. But your entire statement will, as I said, appear in the hearing record. I recommend that Members and witnesses joining remotely use the grid view so that they may pin the timer on their screen.

After your testimony is complete, please remember to mute yourself—which I frequently forget to do—to avoid any inadvertent background noise.

I will allow the entire panel to testify before any questioning of the witnesses. I now call upon Dr. Dessler for 5 minutes of testimony.

STATEMENT OF ANDREW DESSLER, PROFESSOR OF ATMOSPHERIC SCIENCES; AND DIRECTOR, TEXAS CENTER FOR CLIMATE STUDIES, TEXAS A&M UNIVERSITY, COLLEGE STATION, TEXAS

Dr. DESSLER. Chairman Lowenthal, Ranking Member Stauber, and members of the Subcommittee, thank you for the opportunity to discuss the threat of climate change with you. My name is Andrew Dessler, and I am a professor of atmospheric sciences and the Director of the Texas Center for Climate Studies at Texas A&M University, located in beautiful College Station, Texas.

Let me begin with a scientific basis for climate change: first, the climate is warming; second, the scientific community's best estimate is that all of this warming is caused by human activities, mainly the combustion of fossil fuels; third, we are on track to warm the planet in 2100 by about 5 degrees Fahrenheit above the Earth's temperature in the 19th century.

For the global average, this is a huge amount of warming. Although you may personally experience much larger temperature changes over a day or over the seasons, these large local variations you experience cancel with opposite variations in other parts of the world. As a result, the global average temperature is very stable.

To put 5 degrees Fahrenheit of global average warming into context, realize that the warming that transitioned us out of the last Ice Age and into our present warm interglacial period was about 10 degrees Fahrenheit. In other words, a 10-degree Fahrenheit change in global average temperature is the difference between a world covered by ice and today's world. Thus, predicted warming of 5 degrees is half of an ice age. This should compel our attention.

It may be enough to significantly remake the surface of the planet. In fact, 2 degrees of warming that we have already experienced over the past 150 years is already turbocharging severe weather events and turning them into catastrophes. Examples include extreme precipitation events such as Hurricane Harvey, the 2021 Pacific Northwest heat wave, and the ongoing aridification of the U.S. Southwest.

To be clear, climate change does not, in and of itself, cause these events. However, a new field of science, extreme event attribution, allows us to determine that climate change is making many of these events more severe and destructive than they otherwise would be. And we can be certain that the worst is yet to come.

In the non-linear world in which we live, every bit of warming produces more damage than the previous bit. Your intuition should

confirm this. In a rain event, the first inch of rain typically does not cause any damage. However, the twentieth inch of rain can be very destructive. If climate change adds a twenty-first inch of rain, that could turn a severe event into a catastrophe.

To the extent that we don't reduce emissions to avoid future climate change, we must adapt to the changing climate. No one really knows how expensive this will be. Economists are split on whether this will cost a few percent of GDP, something that may not be too burdensome, or wipe out much of our wealth.

One thing is abundantly clear, though: most of the world's inhabitants do not have the resources to address the impacts of extreme weather, even today. For example, if warming temperatures require us to air condition large swaths of the United States that did not previously require it, who is going to pay for that? Installing air conditioning can cost thousands of dollars, and many people simply do not have spare resources to do that.

Luckily, we have the capability to avoid much of the projected warming. The price of climate-safe wind and solar energy has been dropping rapidly over the past decade. Solar has dropped 90 percent, onshore wind has dropped 70 percent, and batteries are presently experiencing similar price drops. Because of this, the United States can largely build a carbon-free grid by the mid 2030s that produces power at prices lower than we pay today.

I should note that fossil fuels have other problems besides climate change. Air pollution from fossil fuels kills millions of people every year around the world. And I know many of the members of this Committee are concerned about energy security.

Let me be clear: fossil fuels are bad for our national security. Oil and natural gas are globally-priced commodities. So, when Russia invaded Ukraine, the price of natural gas spiked here in the United States, despite the United States being a major exporter of natural gas. This is an example of why we will never be able to drill our way to energy security. As long as we rely on globally-priced fossil fuels, we will be subject to political machinations of countries like Russia and Saudi Arabia. It is, therefore, fortunate that we can economically transition away from fossil fuels today.

In conclusion, we are on the brink of potentially calamitous climate impacts. However, we also have the tools to solve the problem. The only question is which of these paths we will choose. Thank you.

[The prepared statement of Dr. Dessler follows:]

PREPARED STATEMENT OF DR. ANDREW E. DESSLER, PROFESSOR OF ATMOSPHERIC SCIENCES; DIRECTOR, TEXAS CENTER FOR CLIMATE STUDIES, TEXAS A&M UNIVERSITY

Climate Change Is an Urgent Threat

Chairman Lowenthal, Ranking Member Stauber, and Members of the Subcommittee, thank you for the opportunity to be with you to discuss the threat of climate change. My name is Dr. Andrew Dessler, and I am a professor of atmospheric sciences and the director of the Texas Center for Climate Studies at Texas A&M University, located in College Station, Texas. I have been studying the atmosphere since 1988 and I have published extensively in the peer-reviewed literature on climate change, including studies of the physics of the climate system.

In my testimony today, I will review what I believe are the most relevant facts about climate science that need to be understood in order to appropriately evaluate all of the policy options available to respond to the threat of climate change.

First, the climate is warming. The Earth is in the midst of an overall increase in the temperature of the lower atmosphere and ocean spanning many decades. Figure 1 shows that the Earth's average temperature has increased about 2°F since the 19th century. This may not sound like much, but later in my testimony I'll explain why this is important.

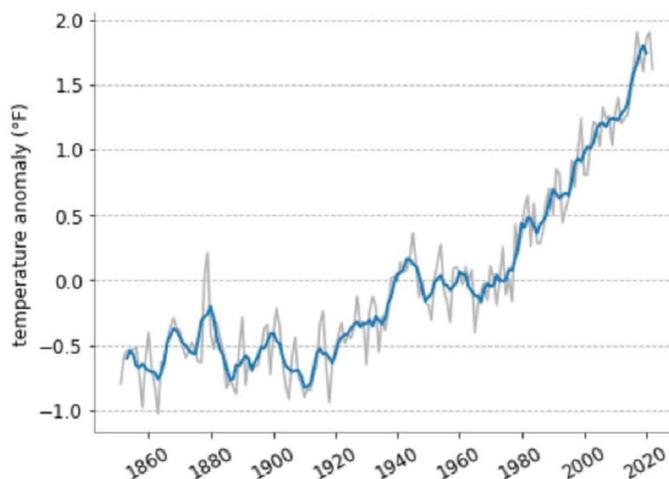


Figure 1. Global annual average temperature change in °F; the gray line is the annual average, and the blue line is a smoothed time series. Data are from the Berkeley Earth Surface Temperature Analysis, downloaded from http://berkeleyearth.lbl.gov/auto/Global/Land_and_Ocean_summary.txt.

Second, the scientific community's best estimate is that all of this warming is due to emissions of carbon dioxide and other greenhouse gases caused by human activities, mainly from the combustion of fossil fuels. This conclusion comes from on several lines of evidence:

- Humans have increased the amount of carbon dioxide in the atmosphere from 280 parts per million in 1750 to 415 parts per million today. Methane levels have more than doubled over this period, and many other greenhouse gases are increasing (nitrous oxide, halocarbons).
- The physics of the greenhouse effect is well understood, and it predicts that this increase in greenhouse gases will warm the climate.
- The actual amount of warming over the last century roughly is in accord with theory and climate models.
- Reconstructions of paleoclimate data over the last 60 million years show an association between changes in atmospheric carbon dioxide and changes in the climate.
- Finally, there is no credible alternative explanation for the recent warming other than an enhanced greenhouse effect due to human activities. There is no evidence that natural variability can explain the warming.

Third, we are on track to warm the planet about 5°F (3°C) above the Earth's temperature in the 19th century by 2100. Such predictions come from computer simulations of the climate, generally referred to as climate models. While criticizing climate models is a popular pastime in the public debate, climate models have shown great skill in predicting many aspects of the climate system. For example, predictions made in the 1970s and 1980s of how much the Earth would warm have closely tracked the actual warming (one prediction is shown in Figure 2), providing high confidence in predictions of future warming.

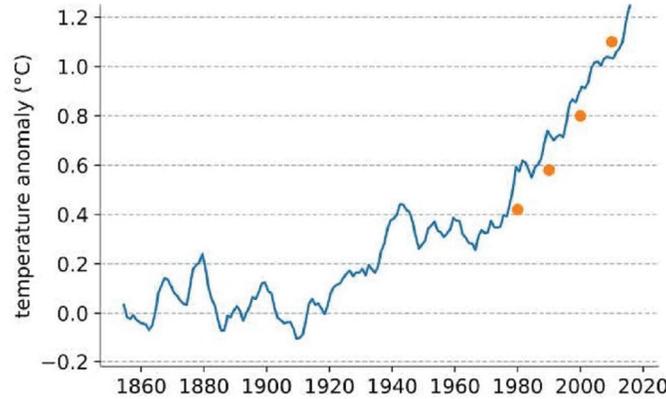


Figure 2. Predictions of future warming (orange dots) from Broecker (1975). Climatic Change: Are We on the Brink of a Pronounced Global Warming? *Science*, 189(4201), 460–463, doi: 10.1126/science.189.4201.460. Observations (blue line) from GISTEMP (Hansen et al. (2010). Global surface temperature change. *Reviews of Geophysics*, 48, doi: 10.1029/2010rg000345).

Fourth, warming of 5°F is a momentous amount of warming. Although you may experience much larger temperature changes over a day or season, such large, local variations tend to cancel when averaged over the entire globe. As a result, the global average temperature has small year-to-year variations, which you can see in Figures 1 and 2.

To put 5°F of warming into context, realize that the warming that transitioned us out of the last ice age and into our present warm interglacial period was about 10°F. That warming radically altered the planet, removing ice sheets thousands of feet thick that covered much of North America and Northern Europe and raising sea level by 300 feet. It also drastically changed ecosystems and species around the world.

Thus, predicted warming for this century of 5°F should compel our attention. In fact, the 2°F of warming over the past 150 years (Fig. 1) is already turbocharging severe weather events and turning them into catastrophes. Examples include extreme precipitation events such as Hurricane Harvey, the 2021 Pacific Northwest heat wave, and the aridification of the U.S. Southwest. To be clear, climate change does not, in and of itself, cause these events. However, a new field of science, extreme event attribution, allows us to determine that climate change is making many of these events more severe and destructive than they would otherwise be.

These impacts are not surprising; in fact, they were predicted decades ago, along with many other impacts, such as the melting the Arctic and acidifying the ocean. And we can be certain that the worst is yet to come: impacts of the next 3°F of warming will be far worse than the impacts of the 2°F we have already experienced. To understand why future warming will be so bad, let me introduce the concept of non-linearity. In a linear system, things change in straight line. If climate impacts are linear, then every 0.1°C of warming would give you the same amount of damage.

In the non-linear world in which we live, however, every 0.1°F of warming produces more damage than the previous 0.1°F. For example, in a rain event, the first inch of rain typically does not cause any damage, however the 20th inch of rain can be catastrophic. The reason is that our society is carefully adapted to the typical range of weather we experience and it's only when the weather departs these conditions that catastrophic impacts can occur.

In other words, individuals and communities are impacted by weather events when they pass thresholds built into the system. These thresholds are designed into a system when assumptions about the climate are built into the system. For example, when you build a bridge, you build in the capability for the bridge to expand or contract in response to a range of temperatures that you expect the bridge to experience. If the climate varies outside that range, the bridge may not perform to its design capability and may need to be closed.

With 2°F of global-average warming, we are departing the climatic conditions that much of 20th century infrastructure was designed for. Every 0.1°F of warming will

push us past an ever-increasing number of these thresholds in the climate system and the economic and social disruptions from these will be substantial.

To the extent that we don't reduce emissions to avoid future climate change, we must adapt to the changing climate. No one really knows how expensive this will be: economists are split on whether this will cost a few percent of GDP, something that would not be too burdensome, or wipe out much of our wealth. As Nobel Prize winning economist William Nordhaus said, "Technological change raised humans out of Stone Age living standards. Climate change threatens, in the most extreme scenarios, to return us economically whence we came."¹

One thing is abundantly clear, though: most of the world's inhabitants do not have resources to address the impacts of climate change. For example, if warming temperatures require us to air condition large swaths of the U.S. that did not previously require it (e.g., Seattle), who's going to pay for that? Installing air conditioning can cost thousands of dollars and many people simply do not have spare resources to do that. Then there is the cost of electricity to run the equipment.

Luckily, we still have the capability to avoid much of the projected future warming. The price of climate-safe wind and solar energy has been dropping rapidly over the past decade—solar has dropped 90% and on-shore wind has dropped 70%—and batteries are presently experiencing rapid price drops. Due to these price drops, the U.S. can build a largely carbon-free grid by the mid-2030s that produces power at prices lower than we pay today.²

In conclusion, we are on the brink of potentially calamitous climate impacts. However, we also have the tools to solve the problem. The only question is which of these paths we choose.

Dr. LOWENTHAL. Thank you, Dr. Dessler.

Dr. Ahtuanguaruak, you are recognized for 5 minutes, and I hope I pronounced your name correctly.

[Pause.]

Dr. LOWENTHAL. All right, Dr. Ahtuanguaruak is having technical problems, and we will return to her right after our next witness. We are now going to hear from Ms. Hopper.

You are recognized for 5 minutes of testimony. Welcome to this Committee.

STATEMENT OF ABIGAIL ROSS HOPPER, PRESIDENT AND CEO, SOLAR ENERGY INDUSTRIES ASSOCIATION, WASHINGTON, DC

Ms. HOPPER. Thank you so much. Good morning, Chairman Lowenthal, Ranking Member Stauber, and the members of the Subcommittee. I really appreciate you inviting me here to discuss the important issues around renewable energy deployment on public lands.

I am actually in California right now, at our largest annual conference. I heard this morning there are over 26,000 of us here talking about solar and storage. So, this is a timely point for the discussion.

My name is Abigail Rose Hopper. I am the President and CEO of the Solar Energy Industries Association, or SEIA. We are the national trade association for solar energy and energy storage, comprised of over 1,000 member companies representing all parts of the solar and storage supply chain, from manufacturers to installers.

With the recent passage of the Infrastructure Investment and Jobs Act and the Inflation Reduction Act, the solar and storage industry will lead the way in combating the climate crisis.

¹ <https://www.nobelprize.org/uploads/2018/10/nordhaus-lecture.pdf>.

² The Berkeley 2035 report, <https://www.2035report.com/electricity/>.

Increasing solar and energy storage deployment throughout the nation is vital, and public lands under the jurisdiction of this Subcommittee are important resources to help our country reach the goal of a carbon pollution free power sector by 2035.

SEIA has long advocated for improving Federal land management policies to improve strategic siting and permitting for solar and storage projects. With the right policies in place, public lands can be used to help create jobs, meet energy needs, and reduce carbon emissions.

The Biden administration has made a goal of siting 25 gigawatts of solar on public lands by 2025. That is just 3 years from now. Meeting this goal is essential to achieve the deployment necessary to reduce carbon emissions and meet our country's energy needs.

Work is ongoing to reassess Federal land that can be developed for solar energy storage, and update staffing and policies around competitive bidding and rental rates that are necessary to provide solar developers the business certainty needed to invest in projects on Federal land. And this work is well worth it.

Supporting more solar and storage development on U.S. public lands will generate enormous economic employment and health benefits for local communities, states, and the entire nation. However, progress is slow, and it will take an all-hands-on-deck, multi-jurisdictional approach to improve.

Since 2010, BLM has fully permitted 18 solar PV facilities, 100 megawatts or greater in capacity, including over 1,500 megawatts of capacity since January 2021 alone. There are 4.9 gigawatts of projects under development on BLM lands, representing around 7 percent of the known utility-scale project pipeline, a substantial increase in recent years.

Together, these figures tell an incredible story: solar development on BLM lands is increasing and permitting timelines are shrinking, likely leading to additional Federal development planning. And it should be noted that these figures represent a snapshot in time prior to the passage of the Inflation Reduction Act.

The biggest obstacle to building solar on public lands is a lack of approved areas for leasing, not necessarily permitting timelines or environmental reviews. Of the other 5,500 megawatts permitted since January 2021, over half are located on lands outside of the solar energy zones. There is a clear policy lesson to be drawn here: permitting agencies should continue to focus on opening up additional Federal lands to solar development.

We believe the Public Lands and Waters Climate Leadership Act will advance this priority, and we urge policymakers to immediately expand the universe of Federal lands available for solar leasing in order to harness the full potential of the Inflation Reduction Act.

Accessibility of solar and storage for all Americans is of paramount importance to our industry. Right now, 250,000 Americans work in our industry. Over the next decade, solar and storage jobs will grow to over 538,000 Americans by 2032, and that will reflect the diversity and talent of our country, with high-quality clean energy jobs in every congressional district.

Investing in education and job opportunities for growing industries like solar can help spur economic growth in communities

across the country, including those impacted by a Federal presence. Solar and energy storage is poised to grow exponentially over the next decade. To meet the President's climate goals, coordination across the Federal agencies and strategic use of public lands can bring jobs and economic development to federally impacted communities.

I look forward to answering any questions you may have. Thank you.

[The prepared statement of Ms. Hopper follows:]

PREPARED STATEMENT OF ABIGAIL ROSS HOPPER, PRESIDENT AND CEO, SOLAR ENERGY INDUSTRIES ASSOCIATION

Chairman Lowenthal, Ranking Member Stauber and the members of the Subcommittee, thank you for inviting me here to discuss the important issues around renewable energy and public lands.

I am Abigail Ross Hopper, President and CEO of the Solar Energy Industries Association (SEIA). SEIA is the national trade association for solar energy and energy storage made up of 1,000 member companies across the country representing all parts of the solar and storage supply chain from manufacturers to installers. Today, 250,000 Americans work in our industry. Over the next decade, thanks to investments made by this Congress and companies across the country, that number will grow to over 538,000 Americans that reflect the diversity and talent of our country in high-quality clean energy jobs in every congressional district.

With the recent passage of the Infrastructure Investments and Jobs Act (IIJA) and the Inflation Reduction Act (IRA), the solar industry will lead the way in combatting the climate crisis. Increasing solar deployment throughout the nation is vital and public lands offer important resources to reach the Administration's climate goal of a carbon pollution free power sector by 2035. For this reason, SEIA supports H.R. 8802, the Public Lands and Waters Climate Leadership Act, which would require the Secretary of the Interior and the Chief of the Forest Service to align management of public lands and waters with the President's greenhouse gas emission reduction goals.

SEIA has long advocated for improving federal land management policies to improve strategic siting and permitting for solar projects. With the right policies in place, public lands can be used to help create jobs, meet energy needs, and reduce carbon emissions.

Provisions in H.R. 8802 may also incentivize dual use solar projects, such as those incorporating agrivoltaics and livestock grazing. We also strongly support provisions in H.R. 8802 that would expressly require input from environmental justice communities. Equity and environmental justice are core values of SEIA's mission. Our energy transition must be based on principles of justice and inclusion.

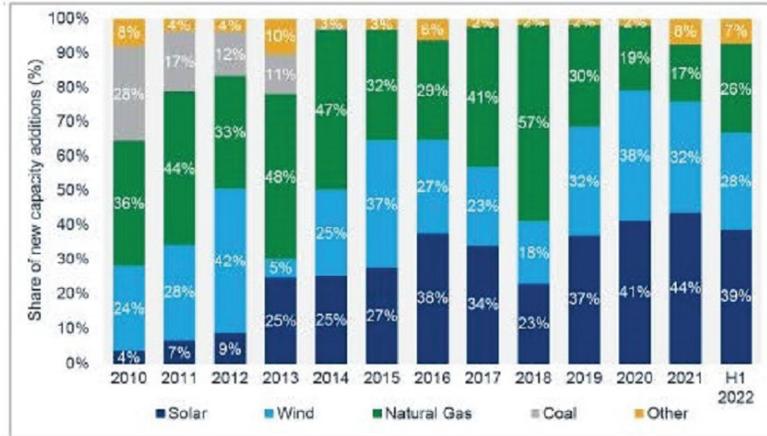
Today, I will share how important strong public land policies are to meeting this critical moment and how public lands can be used to help create jobs, meet energy needs, and reduce carbon emissions.

Solar is the Dominant Source of New Electricity Generation and Will Continue to Grow

Through the first half of 2022, despite challenges with supply chains and trade policies, the solar industry accounted for 39 percent of all new electricity-generating capacity. As the chart below outlines, since 2019 solar has been the leading technology for new electricity generation.¹

¹ <https://www.seia.org/research-resources/solar-market-insight-report-2022-q3>.

New U.S. electricity-generation capacity additions, 2010 – H1 2022



SEIA | Wood Mackenzie
 Source: SEIA/Wood Mackenzie's Solar Market Insight Report Q3 2022 (U.S. Energy Information Administration for all other technologies)

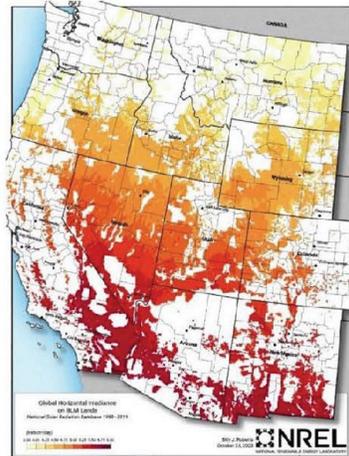
As I shared earlier, this growth in solar deployment has also consistently supported job growth. SEIA estimates that as IIJA and IRA are implemented, an additional 544 GW of solar will be deployed, more than four times the amount of solar installed over the last 10 years. It also means hundreds of billions of investments in the US economy over the next decade, which will turn the solar industry into an annual \$87 billion industry supporting hundreds of thousands of families across the country.

To meet the Biden Administration’s goal of 100% clean energy by 2035, we estimate that the solar industry will need to have installed roughly 1,495 GW of solar by 2035 (equivalent to 40% of electricity generation from solar). Policies in the IRA get us over 60% of the way to that goal. Deploying quickly is critical to avoiding the worst impacts of climate change.

Public Lands Have a Major Role to Play in Deploying Solar and Storage

The Biden Administration has made a goal of siting 25 GW of solar on public lands by 2025. Meeting this goal is essential for achieving the deployment necessary to reduce carbon emissions and meet energy needs. According to the Bureau of Land Management, federal lands offer high-quality insolation—or sun quality—particularly in the American Southwest.²

² https://www.blm.gov/sites/default/files/docs/2022-04/BLM%20Public%20Land%20Renewable%20Energy%20FY21%20Report%20to%20Congress%20v4%20508_0.pdf.



Supporting more solar and storage development on U.S. public lands will generate enormous economic, employment, and health benefits for local communities, states, and the entire nation.

Work is ongoing to reassess federal land that can be developed for solar energy and update staffing and policies around competitive bidding and rental rates that are necessary to provide developers the business certainty needed to invest in projects on federal land. However, this work is well worth it. Supporting more solar and storage development on U.S. public lands will generate enormous economic, employment, and health benefits for local communities, states, and the entire country.

In some cases, major projects are already coming online. For example, EDF Renewable Energy recently announced that the Palen Solar Energy Project built on BLM land in California was fully operating and 457 megawatts and 50 megawatts of battery storage are being generated. The size of this project produces enough electricity to power 116,000 homes.³

Projects like this one are at the forefront of what is possible. Using federal resources—public land—to facilitate the development and deployment of solar and energy storage to the benefit of local communities and the climate. As a country, we will need many more permits approved on many more projects like this one to meet the Administration’s goals.

Coordination and Planning Around a Shared Goal

To combat the global climate crisis, we need an all-hands on-deck approach. Solar and storage deployment on public lands will play a key role in meeting carbon emission reduction targets.

The solar and storage industry continues its efforts to work alongside Congress and agencies to address issues around deployment, and over time, we have seen some improvements. The Energy Act of 2020 made key improvements in interagency cooperation and problem solving to address existing renewable projects and streamline the permitting process for renewable projects. According to the Bureau of Land Management’s 2021 Public Land Renewable Energy report, work is ongoing to reassess federal land that can be developed for solar energy and update staffing and policies around competitive bidding and rental rates. However, more resources are needed if we are going to meet the rapid deployment goals necessary.

Further refinements, such as aligning public lands and waters management with the Biden administration’s emission reduction goals through a regular planning process will help underscore the importance of a cross-governmental effort to site and permit solar energy more expeditiously to speed the U.S. transition to a clean-energy future.

Since 2010, BLM has fully permitted 18 solar PV facilities 100 MW or greater in capacity, including over 1,500 MW of capacity since January 2021 alone. There are

³ <https://www.blm.gov/press-release/interior-department-announces-full-operation-palen-solar-project-california>.

4.9 GW of projects under development on BLM lands, representing around 7% of the known utility-scale project pipeline, a substantial increase over recent years. Together, these figures tell an incredible story: solar development on BLM lands is increasing and permitting timelines are shrinking, likely leading to additional federal development planning. And it should be noted that these figures represent a snapshot in time prior to the passage of the IRA.

The biggest obstacle to building solar on public lands is lack of approved areas for leasing, not permitting timelines or environmental reviews. Of the over 1,500 MW permitted since January 2021, over half is located on lands outside of the Solar Energy Zones. There is a clear policy lesson to be drawn here: permitting agencies should continue to focus on opening up additional federal lands to solar development. We believe the Public Lands and Waters Climate Leadership Act will advance this priority, and we urge policymakers to immediately expand the universe of federal lands available for solar leasing in order to harness the full potential of the IRA.

Opportunities for Land Use

According to a soon-to-be released white paper by the Solar and Storage Industries Institute, “solar development can be compatible with conservation and preservation of community character” when implemented within a science-based siting framework. Further, the paper notes that “new research is beginning to show that more environmental benefits can flow from solar projects, beyond the injection of carbon free electricity into the grid, that should be accounted for during environmental impact review and factored in during permitting.”⁴

For example, large scale solar projects can be seen as tools for preserving land and increasing the value of that property over time. Land can in turn be uncultivated for years which will increase the productivity of soil, or it can host agrivoltaic operations to produce food and clean electricity simultaneously. Research also shows that solar facilities can enhance sheep grazing operations and habitat for pollinator species. We must continue to identify ways that such projects are beneficial to our ecosystem.

Jobs and Economic Development

Accessibility of solar to all Americans is of paramount importance to our industry. While SEIA continues to prioritize diversity, equity, inclusion, and justice, communities that have long faced disproportionate health disparities from industrial sites in minority and low-income communities is something that we must focus on as a nation. Investing in education and job opportunities for in growing industries like solar and storage can help spur economic growth in communities across the country, including those impacted by a federal presence.

SEIA actively works to promote diverse solar and storage supply chain and services suppliers through our Diverse Suppliers Database. In addition, we have developed curriculum for our industry to train in best practices for diversity and inclusion in hiring and retention in order to ensure our industry reflects the character of our communities.⁵

Conclusion

Thank you for your time and continued support of the solar and storage industry. After the passage of both the IRA and IIJA, the solar and storage energy is poised to grow exponentially over the next decade. To meet the climate goals, we must continue building more solar and storage projects on public lands. Many benefits are possible for economic and job growth across the country with increased deployment. However, achieving the steps necessary for additional deployment will require cooperation and coordination across the federal government and consistent alignment with national goals to reduce carbon emissions.

I look forward to answering any questions you may have.

Dr. LOWENTHAL. Thank you, Ms. Hopper. I am now going to return to Dr. Ahtuanguak.

You are recognized for 5 minutes. I hope that the connection is better now. Welcome to the Subcommittee.

⁴Large Scale Solar Siting: Encouraging Ecosystem Enhancement and Conservation While Producing Much Needed Zero Carbon Electricity. <https://www.ssii.org/home/>.

⁵<https://www.seia.org/initiatives/diversity-equity-inclusion-justice>.

**STATEMENT OF ROSEMARY AHTUANGARUAK, MAYOR,
NUIQSUT, ALASKA**

Dr. AHTUANGARUAK. Thank you. I am not sure how long my connection will last. I have submitted written testimony.

This is a very important issue for our community. We work in this process tremendously. And as you all are having technical difficulty, our whole process was like this, trying to participate in commenting and participate in webinars. Bandwidth issues are a real issue. Trying to look at documents as they change over time and provide effective response to what other things may be the answers that are needed for our area don't always come out to be answers that we feel are answers that are necessary.

I worked really hard in looking at all the recommendations for required operating procedures for all the issues around their recommendation and changes. But for this project and the importance of survivability for my community, it is in the wrong location. It is in an area where we already have lots of oil and gas development, but the geological features in this area are very important for the northern migration and the southern migration.

Putting this large development with future development activities continuing to occur in this area puts my community at risk. The northern migration, we need the animals to come around this area and to get around the lake to come back to us. The southern migration, that small area of land on the northeast corner of Bishopville, [inaudible] when the animals are coming back to us in very good prime condition, when we really need to harvest and provide for our families.

Throughout this process, we had to comment during our heightened subsistence activities. We worked really hard because this area is so vital to our community. And even though it impacted us tremendously, we had to make decisions. Are we going to feed our family this year, or are we going to watch the changes that come and threaten the years to come?

These were difficult decisions, but nothing was more difficult than the times that we faced watching what happened with the CD1 gas leak. Having community members coming to me and asking me questions when I could not get answers throughout the process was very difficult. Having family members look at me with their newborn baby asking, "Should I protect my child now? Can we wait for information to see if we are going to be OK, or should I leave right now? Do I need to protect my pregnant wife in order to make sure our future generations are strong? Do I need to leave now?"

Many people made decisions to leave immediately without waiting for the report because they were very concerned during the process in the ways that answers were not being given, the way that statements were given in a unified fashion without responding to our issues and concerns.

The biggest concerns we faced were what does this mean for our future. The rapidity of the oil and gas development with the year-round drilling changed this area tremendously. Is it the rapidity of drilling that caused the instability of the site that led to the CD1 gas leak?

Is it an instability created over many wells? Because the cracks on that pad were over many, many wells, not just one.

Is this an assurance that we have had an evaluation that looked at what happened, why did it happen, and how are we going to prevent it? Because the presentations we had during the calls said that it was a routine occurrence, but we had to ask those questions.

Is this like the Deepwater Horizon? Is this going to be like the process with the village in Bhopal, where they didn't wake up overnight?

Our community felt the effects from the CD1 gas leak. It is just 8 miles away. We had community members who could feel the change in the air. Family members had difficulty breathing. People had headache and nausea. Some people chose to leave.

We watched the industry load their busses and move away from us and not respond to our phone calls as we were trying to assess what was happening, and why the evacuation was occurring, just to have them backpedaling their statements and saying that it wasn't an evacuation. But we had community council members who were at the site when the alarms went off, and told us that we had to leave the area, and told people at the site that they were evacuating.

Our community is important. The importance of our life, health, and safety is why I keep trying in these meetings. The difficulties we face are only becoming amplified.

Earlier in this process I provided testimony—

Dr. LOWENTHAL. Can you please wrap it up? Your full testimony will be in the record.

Dr. AHTUANGARUAK. The concerns for our life, health, and safety have provided health concerns, a whole testimony of all the different health questions that I have faced over a period of time in working with the NPRA.

We don't want this to be our future. We want to be able to live our way of life into the future, as our elders taught us, from our lands and waters.

We thank everyone for giving us this time to communicate and provide testimony and the maps that are there. It is important to us, and we thank you for giving us this time.

[The prepared statement of Dr. Ahtuanguaruak follows:]

PREPARED STATEMENT OF DR. ROSEMARY AHTUANGARUAK, MAYOR,
CITY OF NUIQSUT, ALASKA

Chairman Grijalva, Ranking Member Stauber, members of the Subcommittee, thank you for the opportunity to speak to you today in support of the Public Lands and Waters Climate Leadership Act of 2022, H.R. 8802

Good morning, my name is Rosemary Ahtuanguaruak. I am Iñupiat and am currently a member of the Native Village of Barrow. I was formerly a member of the Native Village of Nuiqsut. I have lived in Nuiqsut for over 35 years. I was born in Fairbanks, and also lived in Utqiagvik for 11 years. I moved back to Nuiqsut in 2016 and am currently the Mayor of Nuiqsut. I also worked as a health aide for 14 years in Nuiqsut.

Today I am here to talk with you about the impacts that climate change and oil and gas development are having on our community and to press for action to combat climate change. This is about more than one specific bill or one specific project. My goal is making sure Nuiqsut survives into the future as an Iñupiat community. That is the biggest concern we have as Iñupiat.

I live a very traditional lifestyle hunting, fishing, whaling, and gathering plants and berries on the lands and waters around my community. I have taught my

family and my community members to live the same subsistence lifestyle that was instilled in me by my elders. We hunt and eat various birds, fish, land mammals, especially caribou, and marine mammals, including seals and whales. In the winter, we go ice fishing on the rivers around Nuiqsut and on Teshekpuk Lake. Fishing is very important to my family, so protecting our rivers and streams from industrial activities and damage is really important to me. In our traditional way, animals, lands and waters are revered and treated with the utmost respect. We work together in harvesting plants and animals and sharing the harvest.

I have family living in villages across the National Petroleum Reserve-Alaska: Wainwright, Utqiagvik, Atkasuk, and Nuiqsut. We have extensive sharing traditions that unite and bind our families and communities, including extended family members in other places.

Our way of life is at risk. Nuiqsut is the closest community on the North Slope of Alaska to oil and gas development, with industrial activities increasingly encircling our community. There are multiple oil and gas developments just miles from our community, close enough for us to see from Nuiqsut. The rapid pace of development around Nuiqsut and our changing climate are already significantly threatening our lands, waters, animals, and people.

The impacts of climate change are very real for our community, and we are already experiencing changes to the landscape that are further impacting our ability to continue our way of life. Climate change is decreasing water levels in our rivers and streams, and in some years that is making it more difficult to get boats out to the ocean for whaling and to travel in the tributaries to areas that are important for our traditional way of life. We see changes to our fish that scientists say are related to the temperatures of our waters, but we also worry about the effects from oil and gas development on these sites with reinjection of toxins into the ground, as we have learned from historical activities. That will leave us with tremendous effects in the future with contaminants in the water system.

Our community is currently assessing hydrology in our area to figure out how to ensure we have continued access to our traditional areas because of the rapid and continuous changes to the permafrost and our waters that are impacting our traditional travel routes. Changes to the sea ice pack and the resulting increased exposure to winds and waves create tremendous risks for our whalers. Without the protective ice pack, it is very dangerous to hunt in our small whaling boats. We have more rain and ice fog because of the open ocean. Torrential rains and hydrology changes are causing erosion, including right here in Nuiqsut and along Colville River. We are having so much rain that it is shifting water levels around the community and causing flooding at times. Erosion is affecting and changing access along our transportation routes, including on the Colville River.

We are also experiencing more sink holes and permafrost thaw. We are having to figure out how to repair structures like our homes and other buildings because of melting permafrost. We've seen entire lakes disappear. An area the size of a city block collapsed around four to six feet in an area adjacent to one of ConocoPhillips' roads. Although the road itself has not collapsed, it shows the risk to all this infrastructure—including the oil wells—around our community. As we interact with industry's activities in our traditional areas, we are constantly seeing industry's attempts to do repairs and other fixes to address these problems.

Climate change threatens our ability to hunt, gather, and store our traditional foods. Every single ice cellar we have has been affected by permafrost thaw. We now have three community freezers, but they are not big enough to fit all the whales we can harvest. These are not a solution to the need for ice cellars. We are trying to modify our ice cellars, and the ways in which we use them, to counter the warming. We make them deeper, we pack them with snow, we add covers to create a buffer, and we change when we put food in there and when we take food out. We also have to store more food in freezers and prepare our food differently to counter the lack of reliable ice cellars. All of this takes a lot of extra effort.

We are already experiencing the devastating effects of existing oil development, in addition to the impacts of climate change. These impacts are significant and reach all aspects of our lives. We see them when we go out fishing. My family's fish camp is about a mile away from the existing oil and gas developments at Alpine. The variations in seasonality caused by climate change, combined with effects from oil and gas infrastructure, are changing our lands and waters. For example, industry's water crossings degrade fish habitat and harm seasonal migrations. Gravel mines and man-made lakes affect water levels and alter plant communities. This requires us to pull our fishing nets from the water prematurely. Gravel infrastructure used for oil extraction causes erosion, resulting in more sedimentation. As a result of all these changes, rivers that we have fished for generations are degraded and fishing requires increased effort in order to meet our needs.

We are also seeing changes that harm our ability to hunt caribou and other animals. Our family has a hunting cabin eight miles from Nuiqsut. This cabin is located across the river from where the Alpine oilfield was built. Before the oilfield, this used to be our preferred place to hunt caribou and geese. The caribou are staying away from industrial activity and avoiding the new roads that run near our community to the Colville Delta 5 and Greater Mooses Tooth development projects. There are changes in the way the caribou use the area, and increasing industrial activities are conflicting with traditional and cultural uses, continuing to affect our ability to harvest. The activity levels at those developments are now so high that hunting around there is greatly impacted; there are too many overflights by aircraft and helicopters, airboats, vehicle traffic, and industry personnel present to successfully hunt. The increasing intensity of industrial activities around us is now constantly impacting and shifting our use areas. These changes continue to become more widespread and intense with every passing year, as development expands. There are hunters that use the road to harvest, but that does not replace the value of harvesting that would have been in this area if we did not face these changes.

Instead of addressing these impacts, the Department of Interior (Interior) is proposing to permit another massive new oil development, known as the Willow project. The Willow project would expand the existing development around our community by an additional 250 oil wells, 37 miles of gravel roads, 386 miles of pipelines, multiple airstrips, a massive processing facility, and a roughly 120-acre gravel mine. The project would have devastating and permanent impacts to our community and way of life.

We talked at length with the federal agencies permitting Willow, explaining that activities should not be done in ways that cause impacts to the migration of the animals or the health of the fish that we depend upon. Yet, Willow would involve roads going across nearly every one of our tributaries to the east of our community and bridges and culverts across many streams to the west, and would place oil and gas infrastructure and widespread industrial activity across an area that is important for caribou and our community.

The construction and operation of the Willow project would mean that harmful industrialization would extend out to the Teshekpuk Lake Special Area. Oil and gas activities near that area will have a big impact on the caribou. Caribou currently have to go around Teshekpuk Lake to reach us in the fall time in Nuiqsut. Because of climate change, the lake is no longer frozen in the summer time and the animals cannot traverse through the lake to get to us. As our elders previously recognized, the northeast corner of the lake is a crucial pathway for the caribou. Willow would disrupt their migratory path even more than existing oil and gas projects already have and will further harm our ability to continue our subsistence way of life. Adding the Willow project to the area near Teshekpuk Lake is a huge threat to our ability to survive.

Oil and gas activities, coupled with the changing climate, are causing the caribou to avoid their historic migration areas, forcing us to travel elsewhere to hunt for them. Our sons, nephews, and grandsons can no longer hope to get caribou in our traditional areas. My son has had to travel over 300 miles to get his caribou. Just like with fishing and caribou hunting, we now have to travel elsewhere and increase our efforts to get our birds.

Willow would continue to encircle our community with oil and gas and would make the subsistence and health impacts that we are already experiencing seem minor in comparison to the impacts we will experience in the future. Interior should not approve any permits for Willow unless and until the impacts we are already experiencing from pollution, industrialization, and climate change can be understood and remedied. But instead of taking the time to understand the impacts, the agencies are working to issue permits to the oil and gas industry without fully evaluating the risks to our health, our plants and animals, our air and water, and our future. Impacts to our climate and the health of nearby communities should drive the way agencies make decisions about industrial projects. Tribal communities, especially those most directly impacted, should be meaningfully engaged and have a voice in these decisions.

We have already seen a great reduction in our resources and ability to teach our traditions just from the industrial noise and current development around Nuiqsut. These changes are affecting how our we teach our younger generation to hunt in our traditional use areas. Other community members and elders have also noticed this and shared these concerns with me.

The whales are also staying farther offshore because of the noise and activities in their nearshore habitat. We were always taught to be quiet to respect the whales. The noise from the industrial activities agitates the whales and can deflect them from their normal migratory path farther out into the ocean, making it harder for

us to hunt. Willow would use barges and offshore equipment to transport infrastructure, and that may risk our subsistence harvesting even further. We cannot afford more nearshore oil and gas activities and or more noise impacts between Nuiqsut and Utqiagvik given our marine mammal harvesting and whaling activities. That is not an acceptable risk for us. Those impacts cost us whales, and cost us feeding our family.

Because of decreased harvests in our traditional areas, we cannot share our foods with our extended families as we used to do and we also have less to consume ourselves. When we cannot practice our traditional ways, our youth cannot learn their heritage. When we do not have our traditional subsistence foods, our people get sick. This raises concerns for our long-term physical, mental, and spiritual health due to the failure to meet our nutritional needs.

Industrial activities forcing people to travel further to hunt and fish creates serious health and safety hazards. The environment is very difficult to travel in and there are risks of injuries that put strains on our limited rescue resources. Climate change has also impacted our roads and trails, weather, and ice, which has contributed to people going missing. People are running out of fuel when they need to travel farther to harvest, they break down further out, they get stuck because erosion or permafrost changes have altered their traditional routes, or the ice is not as thick as it should be. Normal weather patterns are no longer normal and can create conditions where people need to be rescued. In recent years we have had to do many extensive searches for missing people and still have not found some. All of this has put additional strains on our search and rescue and community health resources. We face additional challenges when other people come to our community and it can be difficult to support them with our limited resources. This creates additional pressures for all services, including medivacs and rescue operations. Additional use of areas around our community will only increase these demands.

Our people's health is also harmed by the air pollution resulting from these oil and gas activities, with flaring being a particularly big concern for our air quality. Imagine a massive gas fire burning day and night, emitting toxic smoke and fumes next door to our community. I noticed as a health aide that there were increased numbers of people who needed help to breathe and have suffered from respiratory illnesses with all the development. We have had a tremendous number of people who have needed treatment for respiratory illnesses. We need emissions of greenhouse gases and other air pollutants to decrease to protect our health. We do not need more empty promises that there will be monitoring or measures in the future to address the impacts already occurring now. We need the continuous flaring, which can last for months on end, to stop.

With increased oil and gas activity comes the increased risks of spills, blowouts, and other accidents that present serious risks to our community. Most recently, this March, there was a natural gas leak that lasted for weeks at a drilling pad in the Alpine field. ConocoPhillips evacuated its personnel, but our community was left to figure out for ourselves how to stay safe and to evaluate the risk on our own. As our mayor, I needed to communicate and provide guidance to our community members. But ConocoPhillips and the government agencies tasked with responding to the emergency were not transparent with us about exactly what was going on and did not provide answers to questions. Because they were not transparent and did not address concerns, several families chose to be proactive in opting to leave Nuiqsut during this time to avoid any potential health impacts. ConocoPhillips evacuated about 300 of its own employees even as it publicly denied the leak was a threat to human health and safety in Nuiqsut. This is unacceptable.

We worry and wonder what this gas leaks means to the integrity of the drilling pad and the wells on it and across our region. Whether a gas leak will happen again is something that will haunt us into the future. We do not understand the extent of this recent leak and how it may have impacted the health of our community. Even before this gas leak, young community members would ask me about a well blowout that occurred near our community in 2012 that had serious health impacts on community members. We live in fear of a similar blowout in the future. We worry anytime there is an accident like this gas leak, wondering if it will be an event like the Deepwater Horizon explosion or like the well blowout in 2012. Our air quality monitoring will not give us sufficient notification of such an emergency. ConocoPhillips kept telling us during the calls after the gas leak that methane is odorless, but we worry with some of the emissions being odorless that we may not know how we are being harmed and may not wake up one day. The idea that we might wake up one morning to such a disaster weighs heavily on our community. The fear that we might not wake up at all is a fear that we also face. Having oil development in our backyard takes a mental toll on people of all ages, including me.

I am also concerned that there could be an oil spill someday that will devastate the lands, animals, and waters we depend on. In turn, this would diminish our access to traditional foods for years to come. An oil spill could be devastating. For example, around 2014, a barge ran aground near the Colville River and tested our oil spill readiness. The stress and strain on our community showed previous planning efforts were not up to par. Emotional stress and strain from that event is still felt in the community.

Living with these changes our subsistence lifestyle and these uncontrollable risks to our health has effects on other parts of our life, extending well beyond just the impacts from things like respiratory problems. Everything is connected in our culture. As a health aide, I saw first-hand how increased oil activity affected Nuiqsut. My village has some of the highest rates of alcoholism and violence, and our community has seen these social ills increase over time, often associated with oil and gas development. I believe people turned to this because our food sources have become scarce and it has become harder to continue our traditional way of life and culture.

Mental health issues are some of the hardest for our community to deal with because we do not have resources to respond. The mental health issues we deal with are tied to land use conflicts and a loss or change in subsistence resources because of our identity and connection to the land. It is challenging to find solutions to help people deal with mental health conflicts because we do not have resources to look at how these things are connected to development and to help us come up with solutions. Early conflict with development in the Reserve led to an increase in suicide, and additional more recent development has also led to more suicide. Is this the pattern we are going to continue to face in our region? New development, like Willow, will compound these issues for the community.

What are we going to do to protect our people and our health and wellbeing? What will it take to be heard? Is it numbers of suicides? Numbers of substance abuse treatments? Numbers on health disparities? Those are not statistics I want to count, but are they statistics that will make us heard? What will it take to change the permits for activities and projects that harm us and our lands?

I have been talking about these issues for many years, and yet the agencies do not accurately or fully capture Nuiqsut's views in their analysis or acknowledge the very real risks to our community's survival from the continued spread of oil and gas development. We want to be precautionary and preventative. We want to be protective, and we want to be proactive. This means the impacts that we are already experiencing must be studied before the government greenlights even more industrialization on top of our community. It also means that Interior needs to engage and consult with our community in a real way. That has not been happening.

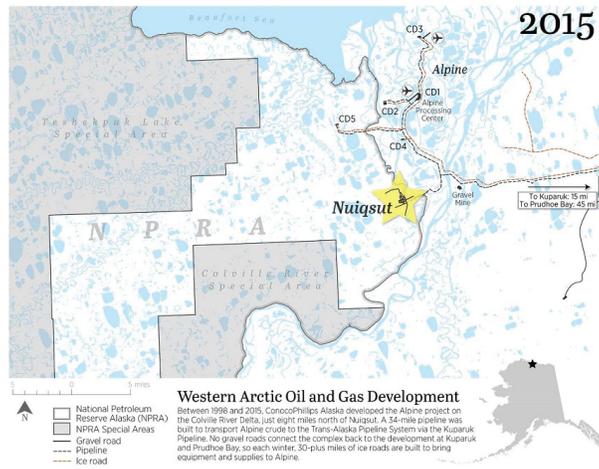
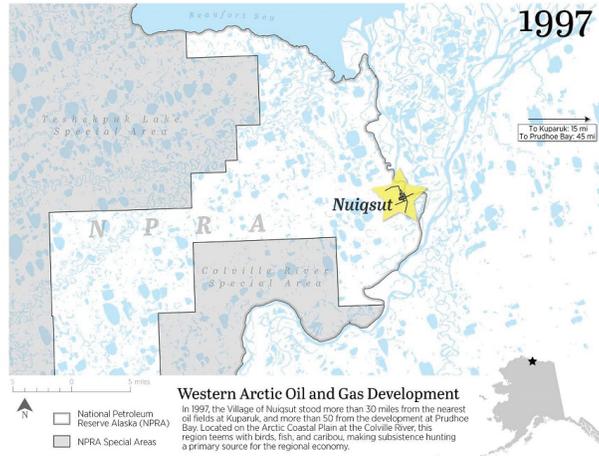
We keep engaging in these permitting processes in the hopes of being heard, even when our experience shows we will not be listened to. Many regulatory processes have occurred over the years, but there is nothing in any permit to respond to our hardships, our loss of harvest, or the loss of our way of life. For the Willow project, the process has been flawed from the outset and continues to get worse. BLM recently held a short comment period on the draft environmental analysis during our busiest time of the year for subsistence harvesting. We asked for more time to submit comments, but the Department of Interior denied that request. We shouldn't have to choose between putting food on our tables versus speaking out on a project that will harm our ability to continue hunting and fishing in our traditional areas. To me, it is obvious that the agencies are going to once again fail to fully consider or address Willow's impacts to our community, and Nuiqsut is going to continue to be sacrificed for the sake of further oil development.

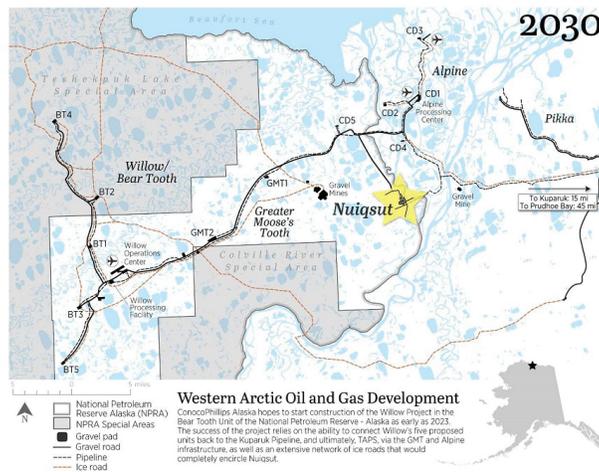
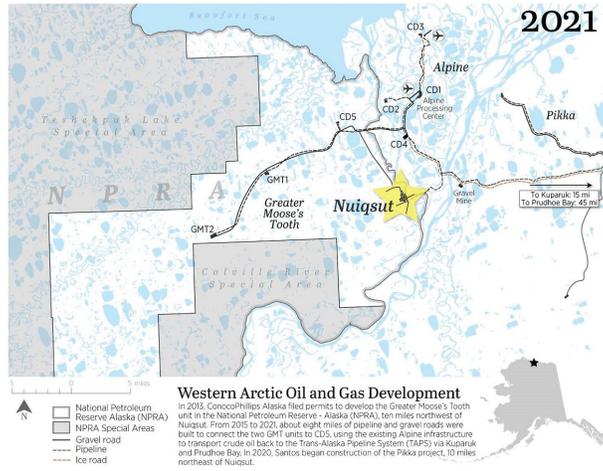
The Reserve is important to me because our families' way of life depends on the health of our animals continuing so that we may continue. Each one of these oil and gas projects puts us at risk, with Willow poised to devastate our community.

Our government seems to spend more time looking for ways to increase oil and gas production than it spends on developing safer and cleaner energy solutions, enforcing these solutions, or protecting the communities most impacted by these projects. Oil and gas development should not happen at the expense of our health and our survival. Our communities are not sacrifice zones.

I fear that our future as Iñupiat is in jeopardy. Congress needs to act. This bill is a step in the right direction for addressing climate change and elevating the voices of communities like ours that are directly impacted by industrial development and the impacts of climate change. I hope this legislation will give a platform to discuss climate and human impacts. I also hope this legislation puts the climate impacts and health impacts of oil and gas development into focus for the Biden administration and Congress.

I ask that you pass this legislation to protect our human rights and our way of life. Qyanaq for the opportunity to address you today.





QUESTIONS SUBMITTED FOR THE RECORD TO DR. ROSEMARY AHTUANGARUAK, MAYOR, NUIQSUT, ALASKA

Dr. Ahtuanguarak did not submit responses to the Committee by the appropriate deadline for inclusion in the printed record.

Questions Submitted by Representative Stauber

Question 1. Does ConocoPhillips provide free natural gas to the community of Nuiqsut to heat homes and generate power?

(1a). How much would the community pay if oil and gas companies weren't making it available to you?

(1b). Would you have natural gas at all?

(1c). Without this free natural gas, how would community residents heat their homes?

Dr. LOWENTHAL. Thank you, Dr. Ahtuanguaruak.
Now, Mr. Stein, you are recognized for 5 minutes of testimony.

**STATEMENT OF KENNY STEIN, POLICY DIRECTOR, INSTITUTE
FOR ENERGY RESEARCH, WASHINGTON, DC**

Mr. STEIN. Mr. Chairman, thank you for the opportunity to testify at this hearing. My name is Kenny Stein. I am the Policy Director for the Institute for Energy Research.

At the outset, I would commend the Committee for recognizing that this new legislation is needed to change how the Department of the Interior manages Federal lands. The Biden administration executive actions attempting to halt or reduce leasing and otherwise restricting multiple use on Federal lands are contrary to statute. In order for the Department to make these sweeping changes, Congress must first change the Department's mandate, as this legislation would. Absent such legislation, though, Interior must immediately cease its illegal efforts to restrict leasing and development on Federal lands.

That said, the approach taken by this legislation would harm our national security by making America more dependent on imports, would damage our economy and drive up already high energy prices, and completely overturn the long-standing principles of multiple use which have historically guided Federal land management.

Before getting to the specific energy implications, I will also highlight the most important and most damaging element of this legislation, and I think the implications of which have not actually been fully thought through.

In Section 2, the legislation would change the guiding principle of Federal land management from multiple use to a standard that "public lands should be managed to rapidly reduce greenhouse gas emissions and co-pollutant emissions." It is difficult to understate the radicalness of such a mandate. Greenhouse gases are byproducts of human activity, all human activity. A mandate to rapidly reduce greenhouse gas emissions on Federal lands is a mandate to rapidly reduce all human activity on Federal lands.

To take just a few examples, there are substantial emissions involved in tourists visiting our national parks and other Federal lands for recreation. This mandate would thus require reducing public access to national parks and Federal lands.

There are greenhouse gas emissions associated with, say, constructing a solar generation facility, cutting down trees, pouring cement, heavy machinery that runs on diesel, and so on. My fellow witness today from SEIA was probably concerned to hear that this legislation's mandate would be used to prevent solar installations on Federal land.

What about a community located on or surrounded by Federal lands which wishes to build a new road, expand an airstrip, or even just construct a few new buildings? All of those actions involve greenhouse gas emissions. Our witness today who represents one of those communities should be concerned about the implications of this sort of mandate on their community's ability to build and maintain basic infrastructure.

If any of these examples sound extreme, just look at the use and abuse of the National Environmental Policy Act. And NEPA only calls for rather anodyne consideration of environmental impacts. This mandate affirmatively orders Interior to reduce emissions by any means necessary, and no matter the cost. In the hands of extreme environmentalist litigants, this legislation would halt not just oil, gas, and coal leasing, which are the ostensible target, it would halt virtually all activity of any kind on Federal lands.

Turning from perhaps those unintended consequences to the intended, this legislation is essentially license to halt production of conventional fuels on Federal lands. While there is an ideological fixation in the environmental community on halting the use of coal, oil, and natural gas, halting leasing on Federal lands does nothing to advance that cause. The economic demand for those resources still exists, and it will have to be met from production elsewhere, whether state and private lands or imported from foreign countries.

Reducing or ending energy production on Federal lands would, however, undermine American national security. While the world, and especially Europe, we have seen them struggling with an energy crisis for much of the last year, the United States has largely been spared the kind of pain that they are going through. But that is because of the strength of our domestic energy production.

Oil production on Federal lands accounts for about 25 percent of U.S. production. The Federal share of natural gas production has fallen somewhat in recent years, but it still exceeds 10 percent of total production. And that production is the reason that the United States is not facing shuttered industries and winter gas shortages like Europe is facing.

Reducing domestic oil and gas production would actually be worse for the environment, overall. Domestic demand for the fuels, like oil and natural gas, which the EIA forecasts to continue to provide the majority of American energy needs even in 2050, will have to be met by imports. But U.S. oil and gas production is cleaner and safer than virtually anywhere else in the world by any measure.

This legislation might allow someone to pat themselves on the back for getting the Federal greenhouse gas emissions tally down a bit, but if your concern is greenhouse gas emissions, it is global emissions that matter. Substituting imports for domestic production would end up increasing overall international global gas and global greenhouse gas emissions.

The economic consequences of this legislation can also not be ignored. Revenues from Federal energy production are crucial for states and communities across the western United States, supporting government services like schools and hospitals. Jobs like solar panel installer or a backcountry hiking guide are no replacement for high-paying, skilled jobs in the energy sector.

For the wider economy, energy prices are already a key driver of inflation, both in ways we see clearly, like the price at the pump and ways of which are more hidden. Restricting supply at a time when global supplies are already tight will only make energy more expensive.

This legislation will cost jobs, increase inflation, reduce government revenues, increase imports, weaken national security, and restrict access to and use of Federal lands by the public. It is all pain and no gain, and should be rejected by Congress.

[The prepared statement of Mr. Stein follows:]

PREPARED STATEMENT OF KENNETH STEIN, POLICY DIRECTOR, INSTITUTE FOR ENERGY RESEARCH

Mr. Chairman, thank you for the opportunity to testify at this hearing.

My name is Kenny Stein, I am the Policy Director for the Institute for Energy Research, a free-market organization that conducts research and analysis on the function, operation, and regulation of energy markets.

I commend the committee for recognizing that new legislation is needed to change how the Department of Interior manages federal lands. The Biden administration executive actions attempting to halt or reduce leasing and otherwise restricting multiple use on federal lands are contrary to statute. In order for the department to make these sweeping changes, Congress must first change the department's mandate, as this legislation would. Absent such legislation, Interior must immediately cease its illegal efforts to restrict leasing and development on federal lands.

That said, the approach taken by this legislation would harm our national security by making America more dependent on imports; damage our economy and drive up already high energy prices; and completely overturn the long-standing principles of multiple use which have historically guided management of federal lands.

Before getting to specific energy implications, I will highlight the most damaging element of this legislation, the implications of which have likely not been fully thought through. In section 2, the legislation would change the guiding principle of federal land management from multiple use to a standard that "public lands should be managed to rapidly reduce greenhouse gas emissions and co-pollutant emissions." It is difficult to understate the radicalness of such a mandate. Greenhouse gases are byproducts of human activity, all human activity. A mandate to rapidly reduce GHG emissions on federal lands is a mandate to rapidly reduce all human activity on federal lands.

To take just a few examples:

- There are substantial emissions involved in tourists visiting our national parks and other federal lands for recreation. This mandate would thus require reducing public access to national parks and federal lands.
- There are GHG emissions associated with constructing a solar generation facility: cutting down trees, pouring cement, heavy machinery running on diesel, and so on. My fellow witness today from SEIA may be concerned to hear that this legislation's mandate would be used to prevent solar installations on federal lands.
- What about a community located on or surrounded by federal lands which wishes to build a new road, expand an airstrip, or even just construct some new buildings? All those actions involve greenhouse gas emissions. Our witness today who represents one of those communities should be concerned about the implications of this new mandate on her community's ability to build and maintain basic infrastructure.

If any of these examples sound extreme, just take a look at the use and abuse of the National Environmental Policy Act. And NEPA only calls for rather anodyne consideration of environmental impacts. This new radical mandate affirmatively orders Interior to reduce emissions, by any means necessary and no matter the cost. In the hands of extreme environmentalist litigants, this legislation would halt not just oil, gas, and coal leasing, which are the ostensible target. It would halt virtually all activity of any kind on federal lands.

Turning from perhaps unintended consequences to the intended, this legislation is essentially license to halt production of conventional fuels on federal lands. While there is an ideological fixation in the environmental community on halting the use of coal, oil and natural gas, halting leasing on federal lands does nothing to advance that cause. The economic demand for those resources still exists and will be met by production from elsewhere, whether state and private lands or imported from foreign countries.

Reducing or ending energy production on federal lands would, however, undermine American national security. While the world, and especially Europe, has been struggling with an energy crisis for much of the last year, the United States has

largely been spared the pain. But that is because of the strength of our domestic energy production. Oil production on federal land accounts for about 25% of US production. The federal share of natural gas production has fallen somewhat, but still exceeds 10%. That production is the reason the United States is not facing shuttered industries and winter gas shortages like in Europe.

Reducing domestic oil and gas production would actually be worse for the environment overall. Domestic demand for those fuels, which EIA forecasts to continue to provide the majority of energy needs in the US even in 2050, will have to be met by imports. But US oil and gas production is cleaner and safer than virtually anywhere else in the world by any measure. This legislation might allow someone to pat themselves on the back for getting the federal greenhouse gas emissions tally down a bit, but if your concern is greenhouse gas emissions, it is global emissions that matter. Substituting imports for domestic production would end up increasing greenhouse gas emissions overall.

The economic consequences of this legislation also cannot be ignored. Revenues from federal energy production are crucial for states and communities across the western United States, supporting government services like schools and hospitals. Jobs like solar panel installer or backcountry hiking guide are no replacement for high-paying, skilled jobs in the energy sector. For the wider American economy, energy prices are already a key driver of inflation, both in ways we see clearly, like the price at the pump, and ways which are more hidden, such as higher grocery prices because of costlier transportation. Restricting supply at a time when global supplies are already tight will only make energy more expensive, adding to already soaring inflation.

This legislation will cost jobs, increase inflation, reduce government revenues, increase imports, weaken national security, and restrict access to and use of federal lands by the public. All this is to be done in the name of reducing greenhouse gas emissions, but even that is a mirage. When federal supply is replaced by imported fuels with higher emissions profiles, overall global emissions will rise. It's all pain and no gain, and should be rejected by Congress.

QUESTIONS SUBMITTED FOR THE RECORD TO KENNETH STEIN, POLICY DIRECTOR,
INSTITUTE FOR ENERGY RESEARCH

Questions Submitted by Representative Stauber

Question 1. If this bill were to go into effect and our Federal oil and gas program was halted, which I believe is this bill's true intent, what would the result be on energy consumption?

Answer. The legislation would not change energy demand in any way. Energy resources including oil, natural gas and coal would still be needed. The only impact would be to increase the cost of those resources by restricting supply.

Question 2. Would people all over the world stop using oil and gas to drive their cars and heat their homes? Or would they get it from somewhere else?

Answer. No, this legislation would not do anything to change energy use patterns. Natural gas will remain favored over electricity for home heating because it is more cost effective and efficient, especially in colder climates. Even optimistic scenarios for electric vehicle adoption still have a majority of the cars on the road running gasoline for many decades to come. If domestic sources of these resources are cut off, as this legislation seeks to do, we will have to import them from foreign producers.

Question 3. If oil and gas were procured from overseas instead of domestic production as a result of this bill, what impact would that have on global emissions?

Answer. US oil and gas production have among the best emissions profiles (for all emissions, whether greenhouse gases or toxic pollutants) of production anywhere in the world. To take just one example, in the US well more than 90% of associated methane from oil production is captured and put to use, whereas in most oil producing countries the majority of associated gas is vented or flared directly into the atmosphere. Imported oil and gas that would be needed to replace domestic production would also come by sea on ships, which of course have emissions of their own. Overall, replacing domestic production with imported oil or gas would actually increase global emissions.

Questions Submitted by Representative DeGette

Question 1. What level of climate change consequence would you consider a crisis?

Answer. Climate change is a gradual, long-term trend with highly uncertain impacts. I do not think that a gradual, long-term trend can be described as a crisis. The term “Crisis” is a simple matter of personal opinion and, for me, requires immediacy and immediate significance.

(1a). Would you consider a steady increase in the frequency and intensity of storms such as Hurricane Ian, Hurricane Fiona, Typhoon Merbok, Typhoon Noru, Typhoon Nanmadol, and Hurricane Katrina a crisis?

Answer. There is no strong evidence that the frequency or intensity of hurricanes has been increasing. Global hurricane frequency and global Accumulated Cyclone Energy show no positive trend over the last 50 years. Indeed, recent years have seen both measures at historical lows.¹ The IPCC, WMO, and NOAA do project such an increase in the future due to warming, but there is not high confidence of current detectable impact. To quote NOAA, for example: “We conclude that the historical Atlantic hurricane data at this stage do not provide compelling evidence for a substantial greenhouse warming-induced century-scale increase in: frequency of tropical storms, hurricanes, or major hurricanes, or in the proportion of hurricanes that become major hurricanes.”² Even if such a trend did exist, no, a gradual, long-term trend is not a crisis.

(1b). Would you consider a steady increase in the frequency and severity of in-land flooding, such as that which occurred in July of this year in Missouri, Illinois, Kentucky, Virginia and West Virginia a crisis?

Answer. The National Climate Assessment (NCA) states: “Human-induced warming has not been formally identified as a factor in increased riverine flooding and the timing of any emergence of a future detectable human-caused change is unclear.”³ I am also not aware of a documented increase in the frequency or severity of flooding events in the US. The EPA river flooding climate change indicator tracker finds increasing floods in some regions and decreasing floods in other regions.⁴ The NCA likewise states: “Trends in related types of extreme events, such as floods, are more difficult to discern.”⁵ Even if such a trend did exist, no, a gradual, long-term trend is not a crisis.

(1c). Would you consider the collapse of the Colorado River as a primary source of water for 40 million Americans a crisis?

Answer. The NCA states: “Although recent droughts and associated heat waves have reached record intensity in some regions of the United States, the Dust Bowl of the 1930s remains the benchmark drought and extreme heat event in the historical record, and though by some measures drought has decreased over much of the continental United States in association with long-term increases in precipitation, there is as yet no detectable change in long-term U.S. drought statistics.”⁶ The IPCC AR6 is similarly mixed in connecting drought and climate change. The Climate Science Special Report accompanying the NCA put it: “Western North America was noted as a region where determining if observed recent droughts were unusual compared to natural variability was particularly difficult. This was due to evidence from paleoclimate proxies of cases of central U.S. droughts during the past 1,000 years that were longer and more intense than historical U.S. droughts.”⁷ The scientific literature does not support attributing the Colorado River water situation to climate change.

I would say that the Colorado river water shortage can be termed a crisis. However, it is not a “climate crisis,” it is a water management crisis. The Intermountain West and the Colorado River specifically have been prone to drought for tens of thousands, if not hundreds of thousands, of years. The water allocations between western states and Mexico were decided during one of the wettest periods in history and never adjusted for reality. The Colorado River is not capable of supporting the level of population and agriculture currently using it, and it was never capable of doing so. Continuing to rely on this river instead of developing alternatives or keeping consumption growth in check was a policy error, and has

¹ <https://climatlas.com/tropical/>.

² <https://www.gfdl.noaa.gov/global-warming-and-hurricanes/>.

³ <https://nca2018.globalchange.gov/chapter/2/>.

⁴ <https://www.epa.gov/climate-indicators/climate-change-indicators-river-flooding>.

⁵ <https://nca2018.globalchange.gov/chapter/2/>.

⁶ <https://nca2018.globalchange.gov/chapter/2/>.

⁷ <https://science2017.globalchange.gov/chapter/8/>.

resulted in a crisis. But this crisis has come about irrespective of climate change. Talking about climate change in this context is frankly harmful because it gives people the impression that taking action to fight climate change can address or would have prevented the situation, as if having 100% renewable electricity would prevent a drought in the western US. It misdirects attention and resources and prevents the public and elected officials from grappling with the real underlying water management issue.

Question 2. What adaptation measures would you recommend for those whose lives and livelihoods will be ended or disrupted by the above events?

Answer. The options for adaptive measures are near endless, so it would be impossible to list them all. I'm sure there are plenty of engineering ideas that I am completely unfamiliar with because humans are endlessly creative. Both globally and domestically, we have seen precipitous declines in the number of deaths from climate events. We have also seen no increase in the damages from climate events as a percentage of GDP, despite the human habit of building and living in places where such events are regular occurrences. That is why I confidently stated my belief that humans can adapt and overcome whatever impacts might be experienced from rising temperatures.

Additionally, adaptation will be required, regardless of the policy choices in the US and Europe. The rest of the world outside rich, developed countries is not on board with forced reduction of greenhouse gas emissions. China, India, Brazil, Nigeria, South Africa, and so on all aspire to American, or at least European, living standards, and they are going to emit whatever it takes to get their populations things like reliable electricity, personal transportation, and other modern conveniences. Even Europe has been rapidly discarding climate targets in the face of their current energy crisis. So, GHG emissions are going to continue to increase globally, full stop. Thus any impacts from those emissions are going to happen and we are going to have to deal with them through adaptation.

However, I will list a few ideas for each of the above scenarios (for each of which there is insufficient evidence of effects from climate change).

Hurricanes: stronger building standards; restoration of mangroves/wetlands/barrier islands; reducing groundwater pumping; improved roads and bridges; improved warning systems; sea walls; preventing development in the most flood prone areas

River flooding: levees and defined flood plains; only channelizing rivers where necessary; stronger building standards; warning systems; preventing development in some flood prone areas; establishment/restoration of wetlands or conservation areas for water catchment; modernization/construction of dams

Colorado River: development of additional sources (e.g. desalinization, dams, recycling); planting less thirsty crops; improving irrigation and water transportation infrastructure to reduce leaks and evaporation; expanding drip irrigation and other improved irrigation techniques; limiting certain types of superfluous water consumption (like lawns); changes to water usage rights and laws to prevent wasteful "use it or lose it" approach to water rights.

Dr. LOWENTHAL. Thank you, Mr. Stein.

I think I want to thank the panel for their testimony, and I want to remind the Members that Committee Rule 3(d) imposes a 5-minute limit on questions.

The Chair will now recognize Members for any questions they may wish to ask the witnesses. I am going to start by recognizing Representative DeGette for 5 minutes of questions.

Ms. DEGETTE. Thank you so much, Mr. Chairman, and I want to thank you for your comity in recognizing me now. I have another meeting I have to go to.

Dr. Dessler, I really appreciated what you said in terms of, not only do we need to get to energy independence and renewables because we need to do it for the existential threat of climate change, but also we need to do it for economic reasons to get

independent of our international oil and gas market, which causes things like the big gas price spikes that we saw this summer.

For the last year, a lot of us on this Committee have been forced to sit week after week and listen to our Republican colleagues assail the solar industry over importing solar products from countries with poor labor and environmental processes, as if we support poor labor and environmental processes, which is not true. And this is why, Ms. Hopper, I am so glad you are here joining us today from California to talk to us about this, because I just wanted to ask you about the industry's response and positions on what we can do to keep that from happening.

So, I want to ask you if the solar industry supports swift and robust implementation of the Uyghur Forced Labor Prevention Act and other actions to block the importation of products made with forced labor.

Ms. HOPPER. Congresswoman, thank you so much for that question. The answer is unequivocally yes. We support quick and swift implementation of the Uyghur Forced Labor Protection Act.

We act expeditiously in our industry and in our association, first of all, to make clear that unethical labor practices, forced labor practices, any of those sorts of things, we do not want them to be a part of the solar supply chain.

So, we have taken specific steps to change our supply chain. We have created a traceability protocol that our companies are utilizing to be able to trace where their products are coming from all the way back down the supply chain. We have worked very closely with Customs and Border Protection to ensure that they have the information they need to validate where our products are coming from.

And one of the most important pieces is the action that this Congress took under the Inflation Reduction Act to help bring domestic manufacturing back to the United States, so that we have a much clearer view of where our products are coming from, what the inputs are, and, in addition, provides lots of economic opportunities.

So, this is an issue that we are very focused on, and I look forward to continue to work closely with you on that. Thank you.

Ms. DEGETTE. And I want to tell you, Ms. Hopper, that in Congress we also believe—and that is why we passed this bill—that we should be producing and processing more of the raw materials for our solar technologies.

Also, I think you would agree there are other countries who are our international allies who have strong labor and enforcement laws that we could also partner with. Do you also support that in your industry?

Ms. HOPPER. Absolutely. We have very well established, trusted trading relationships with many countries around the world who have similar values as ours around labor and environmental standards, and that is part of the supply chain.

Ms. DEGETTE. Thank you so much.

Mr. Chairman, thank you very much, and I think I will leave my next line of questioning for someone else. But I want to thank you for having this important hearing.

I want to thank Chairman Grijalva for his vision with this Committee in having these types of legislation, and I yield back.

Dr. LOWENTHAL. Thank you, Representative DeGette.

I now call upon and recognize Representative Stauber for 5 minutes of questions.

Mr. STAUBER. Thank you very much, Mr. Chair.

Dr. Ahtuanguaruak, can you hear me?

Dr. AHTUANGARUAK. Yes, I can.

Mr. STAUBER. OK. Did you write your testimony?

Dr. AHTUANGARUAK. Yes, I did.

Mr. STAUBER. It appears, from my end, that the file's author is actually a Bridget Psarianos. Does this person work in an official capacity for your city?

Dr. AHTUANGARUAK. I have worked with many different people over the last 30 years, various relationships over many years.

[Audio malfunction.]

Mr. STAUBER. Doctor, I believe—

Dr. LOWENTHAL. We are losing contact with the doctor.

Mr. STAUBER. Is she still on, Mr. Chair?

Dr. AHTUANGARUAK. I am sorry, can you hear me?

Dr. LOWENTHAL. Now we can hear her.

Mr. STAUBER. Yes.

Dr. AHTUANGARUAK. OK.

Mr. STAUBER. Mr. Chair, I would like to reclaim whatever time was lost in that—

Dr. LOWENTHAL. Absolutely, absolutely.

Mr. STAUBER. Thank you.

So, Dr. Ahtuanguaruak, it appears that Bridget Psarianos wrote this. Does she work in an official capacity for your city? I don't mean to fluster you.

Dr. AHTUANGARUAK. No.

Mr. STAUBER. She doesn't?

Dr. AHTUANGARUAK. No, I have worked with many different people over 30 years or so in this practice, and she was with previous relationships.

Mr. STAUBER. Dr. Ahtuanguaruak, I have document properties from your testimony that says the author of your testimony today that you said that you wrote was from a Bridget Psarianos.

It appears that Ms. Psarianos works for a Trustees for Alaska, an environmental group actively participating in a lawsuit seeking to kill the Willow Project. In fact, she was quoted recently in a *Washington Post* article saying, "My hope is that Willow dies a death by a thousand cuts." That is her quote.

Mr. Chair, I would like to submit for the record 36 letters of support for the Willow Project from Alaska Natives, labor groups, trade associations, and elected representatives. The most recent one is dated September 16, 2022, that has all Federal elected representatives out of Alaska supporting the Willow Project.

Dr. LOWENTHAL. Without objection.

Mr. STAUBER. Mr. Stein, thank you so much for joining us today. Your testimony discusses how this bill shifts away from the long-standing principles of multiple use on our Federal lands to a single, closed-minded approach.

Could you provide a brief background on the importance of a true, multiple-use mandate contrasted with a new, shortsighted approach like the one in this bill?

Mr. STEIN. Sure. So, multiple uses is a lot like what it sounds like. It is that public lands are supposed to be available to the use of the public in multiple different ways. And that means, certainly, recreation, hiking, biking. It also means resource extraction, timber, mining, oil and gas, and wind and solar generation. So, the idea is that these are public lands are available for the use of the public.

This legislation changes that mandate and would effectively override that multiple use because, as I said in my testimony, greenhouse gases are a side effect of all human activity. So, any human access onto Federal lands, virtually any human access onto Federal lands, is going to generate greenhouse gas emissions and would thus be contrary to this new mandate.

Mr. STAUBER. H.R. 8802 would halt all new leasing of coal, oil, gas, and fossil fuel infrastructure on Federal lands until the Secretary develops a "public report and action plan." Could you discuss how this plan will simply create more litigation and get the anti-American energy activist lawyers paid?

Mr. STEIN. Well, sure. As I mentioned the NEPA process, this is basically adding a new NEPA process, because the Interior is going to spend an extended period of time coming up with this program, then everyone is going to sue to say there are problems with the program, and that is going to have to go through litigation. And 10 years from now, we will still be trying to get our first program set up in the first place. And during that entire time, oil and gas leasing will be halted.

Mr. STAUBER. Thank you. Just for your information, there is a mine in Minnesota that has been going through the process. We are working on pushing 20 years now. So, I understand.

Mr. Chair, I yield back.

Dr. LOWENTHAL. Thank you, Representative Stauber. I now recognize Representative Dingell for 5 minutes of questions.

Mrs. DINGELL. Thank you, Chairman Lowenthal, for holding today's hearing. It is a very important issue.

Thanks to the Biden administration, we are on a path to significantly and meaningfully cut our carbon emissions and achieving a net-zero clean economy by 2050. This includes making a transformational shift in the transportation sector to electrification, which is very important. But our public lands and oceans have a role to play, as well, in the fight against climate change. And that is why this hearing today is so important.

I would like to start with Ms. Hopper to discuss the challenges of working on public lands as it relates to solar projects, and how we can improve the permitting process.

Ms. Hopper, what are some unique challenges of working on public lands, and what steps has the Biden administration taken so far to reduce these challenges?

Ms. HOPPER. Good morning. Thank you for that question, Congresswoman.

Some of the unique challenges of working on public lands are sort of the interagency aspect of it, that there are often numerous

entities that are involved in the permitting. So, sometimes there isn't always as clear communication or timelines which, obviously, impact the attractiveness of the project to developers.

There are rental rates that have historically been changed and most recently were lowered by the Biden administration. That has been a very welcome development.

During the Biden administration—I think I mentioned in my testimony, the BLM has permitted 1,500 megawatts on public lands. That is as a result of some of the expedited permitting processes.

But anything that this Administration or this bill can do to both increase interagency collaboration and make more public lands available will be helpful.

Mrs. DINGELL. I am going to combine two questions because I want to try to get several questions in and one with another witness.

What more can we do, as a Congress and the Administration, to improve the permitting process for solar energy products?

And you have experience, as we know, as the Director of Ocean Energy Management. Can you speak to the importance of fully-staffed and resourced Federal agencies that oversee and permit clean energy?

Ms. HOPPER. Absolutely. It is critical, regardless of the energy source, that the agencies have the staff and the expertise they need to do the work that we have entrusted them with. So, fully funding the office, the BLM, Renewable Energy Office, other agencies is critical to allowing an expeditious permitting process to go forward.

Additional things that this Congress can do is to really instruct the Bureau of Land Management, in particular, and U.S. Forest Service to make more land available for solar and storage development. Those two things will go a long way to expediting the process.

Mrs. DINGELL. Thank you.

Dr. Dessler, as a climate scientist, what is your view on the Inflation Reduction Act?

And do you think its implementation is critical to the United States achieving its climate targets in the coming years?

Dr. DESSLER. Yes. I think that the United States has a stated target of reducing emissions 50 percent by 2030, and go to net-zero by 2050. That is what the Biden administration has said the target is. I think the Inflation Reduction Act is crucial for achieving those targets.

While the cost of wind and solar are now the cheapest energy sources, we are still not transitioning fast enough. The market is not moving fast enough for various systemic reasons like transmission availability and permitting, and things like that, that you need to have policy like the Inflation Reduction Act in order to hit the targets that the Biden administration has set.

Mrs. DINGELL. Would any of you like to comment about access to public lands, and how we increase accessibility to minerals that we are going to need to lessen our dependence on China at 80 percent, and bring that home to this country?

[Pause.]

Mrs. DINGELL. I may ask you all some more, but were you going to say something, Doctor? I am going to submit some more questions for the record.

[Pause.]

Dr. AHTUANGARUAK. This is Rosemary, and there are very important issues to discuss, but not all of our special areas should be sacrificed for the needs for energy. We need to work together on identifying areas where we need to work on these issues to obtain the resources to allow us to make these changes and the needs for energy development.

Mrs. DINGELL. And protect the environment and communities at the same time. It is a challenge, but we can have economic security, national security, and environmental security. They are not exclusive. And that is what we all have to work to do.

Thank you, Mr. Chairman. I yield back.

Dr. LOWENTHAL. Thank you, Representative Dingell.

I now recognize Representative Graves for 5 minutes of questions. Welcome.

Mr. GRAVES. Thank you, Mr. Chairman. I appreciate the recognition and the hearing.

This is once again another piece of legislation that completely ignores facts. It ignores science, it ignores data. It just comes in with a sledgehammer and says, "We are going to take all of our public lands and put them off limits to energy production," whenever the Administration, the Biden administration's projections, show that you are going to have a 50 percent growth in global energy demand in the next 28 years.

It weakens NATO because our European friends, our NATO allies in Europe, they need additional conventional energy sources, and in some cases still getting it from Russia, funding the war that they are then funding Ukraine to try to repel.

Every action that this Administration has taken virtually, has added up and resulted in greater greenhouse gas emissions. Not lower, but greater. So, to see the Chairman once again come in and completely ignore facts, science, data, reality that indicates that by producing American energy you actually result in lower global greenhouse gas emissions.

I am curious, Mr. Stein. When you take options off the table like this, do you see a requisite reduction in demand for energy?

Mr. STEIN. Well, no, and that is precisely the point. These sources are going to be used. The Ranking Member mentioned heating homes in Minnesota; that is not an option, and you need natural gas to do that. So, it is going to have to come from somewhere. And if it is not produced here, that has to be replaced by imports.

And again, there are much lower environmental standards around the world than in the United States.

Mr. GRAVES. Lower environmental standards, for example, in the offshore Gulf of Mexico, some of the least carbon-intensive barrels and cubic feet of energy in the world. Yet, we are watching this Administration go out and ask Venezuela, ask Iran and other countries for energy. Those countries have higher emissions than the United States and, as you indicated, lower environmental or safety standards.

So, what happens with global greenhouse gas emissions when you do that?

Mr. STEIN. Well, if you are replacing the American sources that generally are, as you said, lower emissions than most places where oil and gas are produced, then ultimately—domestically, it might look like we have lowered our greenhouse gas emissions. But on a global level, emissions actually will likely end up higher because, again, in places like Venezuela or Nigeria the natural gas is basically all vented and flared. It is not used at all.

Mr. GRAVES. Is that right?

Mr. STEIN. Whereas in the United States, we capture more than 90 percent of our natural gas that comes up with oil.

Mr. GRAVES. Of course, I am asking a question that I know the answer to, but is this strategy going to result in stabilizing the climate in the United States, but then causing climate problems in other countries, or is that not how it works?

Mr. STEIN. Well, climate change is a global effect, so any changes are global. Just because we lower our emissions here, that doesn't mean that it changes the impact of climate change on the United States.

Mr. GRAVES. So, once again, a science-uninformed bill that once again the Committee is putting forth. This plays into the hands of other countries that are largely adversaries of the United States.

So, you failed that one by giving them benefits. You have failed on the environmental front, because this is going to result in greater greenhouse gas emissions.

Mr. Stein, another question: What happens to the U.S. trade deficit whenever you shut down domestic energy production opportunities and become more dependent upon foreign sources?

Mr. STEIN. Well, that is the great irony, that 20 years ago we were very concerned about our dependence on foreign oil, and it is domestic production that has made us not concerned about that.

Mr. GRAVES. So, this would increase the trade deficit, meaning that we would be taking something we are currently producing in the United States and exporting, and we would become more dependent upon foreign sources that, by the way, are dirtier. So, less economic activity in the United States, handing over our dollars to other countries that are unfriendly, eliminating jobs in the United States, and creating job opportunities in other countries that aren't friends of the United States. Is there any upside to this?

Mr. STEIN. Certainly not that I see.

Mr. GRAVES. Yes, that is what I thought. Great, thank you. I appreciate it.

I yield back.

Dr. LOWENTHAL. Thank you, Representative Graves. Has Representative Huffman returned to the—

Mr. HUFFMAN. I am in the Committee room, Mr. Chairman.

Dr. LOWENTHAL. Well, then I am going to recognize you for 5 minutes of questions.

Mr. HUFFMAN. Thank you, Mr. Chairman. You know, it is pretty rich to hear colleagues across the aisle criticize this bill for not respecting science and data, when, in fact, all of the science relating to our climate tells us we have a crisis.

The overwhelming consensus of the best scientists in the world is that we have a climate crisis that is driven by, primarily, the burning of fossil fuels. And we have this decade to fundamentally change course, or else we may well have an unlivable planet. That is what science and data tells us. So, to turn around and claim that taking action in the face of that crisis somehow doesn't jive with the science and data is just not a credible position.

But an interesting thing has happened in Republican messaging on climate. The climate crisis has gotten so obvious. The typhoon in western Alaska is just the latest. In any given week, any given day, this planet is telling us that all of the climate models, all of the warnings we have been receiving for decades are real, they are correct. And, in fact, these impacts are accelerating. And it is something we just are past due to grapple with. But Republicans can't deny all that outright anymore. It has just become too obvious to anyone who is paying attention. So, what they do is they just attack any attempt to take action on it. They come up with excuses and tortured arguments.

We heard incredible exaggeration from Mr. Stein taking a policy in this bill that would simply require that we manage public lands and our Outer Continental Shelf to reduce greenhouse gases, and extrapolating from that that we are going to literally shut down all activity on public land. That is preposterous. Suggesting that these actions somehow will be worse for the environment than a business as usual status quo, where we are contributing to this climate crisis and wrecking public lands with fossil fuel developments in the worst possible ways, these are just not serious arguments, and it is too bad that we have to even respond to them.

But before I turn to Ms. Hopper with a specific question, let me thank Chair Grijalva for this bill. It is a good piece of legislation. I am proud to be co-sponsoring it. It is, I think, a necessary response to the Inflation Reduction Act, which sets some important policies in place to move toward clean energy, but also saddles us with some business-as-usual fossil fuel leasing that is hard to reconcile with our climate goals. This bill puts in place a process that will kind of force that reconciliation, and I think it is a very good follow-on to the Inflation Reduction Act.

But, Ms. Hopper, on behalf of the solar industry, you probably want to build some projects on public lands. So, gosh, if this terrible, sinister language in this bill would shut down all human activity on public lands, create a no man's land where no one could ever go, no one could ever do anything, and all the other absurdities that we heard from Mr. Stein, you probably would oppose that language. But I hear you are here today supporting that language. Do you want to explain why?

Ms. HOPPER. Sure, thank you, Congressman, and I am here supporting this bill because it is important to—while we need to look at the greenhouse gas impacts of all energy generation and all activity, I think what this bill is really asking for is a balanced approach, just understanding what the impacts are, and making informed decisions based on data and based on science.

We think that solar energy is a critical piece of the solution set for the climate crisis, and the production, the build, and the installation of solar panels is an activity that is appropriate. And the

climate benefits we would get vastly outweigh any greenhouse gas implications of the bill. So, we think it is important to do it, and we would love to build more on public lands.

Mr. HUFFMAN. Thank you.

Mr. Stein, I am going to just ask you a yes-or-no question. You must be familiar with the IPCC's reporting, telling us that there is a climate crisis caused by primarily the human burning of fossil fuels, and that we have a very limited time to fundamentally and rapidly change course and decarbonize the global economy. Do you agree with that consensus with the IPCC or not? It is a yes-or-no question.

Mr. STEIN. That is not what the IPCC says. It does not say that there is a climate crisis. You will not find that in the IPCC scientific reports.

Mr. HUFFMAN. OK. Do you believe there is a climate—

Mr. STEIN. That is not a scientific statement, "a climate crisis," no, absolutely not.

Mr. HUFFMAN. That is fascinating to hear.

Mr. STEIN. It is not a scientific statement.

Mr. HUFFMAN. So, do you believe there is a climate crisis?

Mr. STEIN. No, I do not.

Mr. HUFFMAN. OK.

Mr. STEIN. It is not a crisis. The Earth is not becoming uninhabitable, and it will not become uninhabitable. Even the worst case scenarios don't indicate an uninhabitable—

Mr. HUFFMAN. This is wonderful to hear this in its fullest form.

Do you believe it is just fine to be on track for 2 degrees Celsius or greater warming by mid-century, end of this century, all that is just fine?

Mr. STEIN. I think humanity is more than capable of adapting to that warming, yes.

Mr. HUFFMAN. Well, let us welcome the true expression of climate denial that sometimes our Republican friends like to say they have evolved beyond. It is alive and well.

Mr. STEIN. It is funny that you are making extreme statements in the alarmist direction is not denial. That is interesting to me. You are just as extreme on the other side.

Dr. LOWENTHAL. Representative Huffman, your time has exceeded. Thank you for your questions.

I now recognize Representative Tiffany for 5 minutes of questions.

Mr. TIFFANY. That is a hard act to follow, but thank you, Mr. Chairman.

Dr. Ahtuanguak, for Fiscal Year 2021, oil and gas property taxes accounted for approximately 95 percent of the North Slope Borough's total property tax revenue for essential services. Is that accurate? Is that number correct?

Dr. AHTUANGARUAK. That is a borough number. We would have to communicate with the borough. I assume that was formulated with their efforts.

Mr. TIFFANY. But is it correct that oil and gas property taxes provide most of the budget for essential services up on the North Slope?

Dr. AHTUANGARUAK. Yes, the state of Alaska and also the borough are very reliant on oil and gas development.

Mr. TIFFANY. And then the Willow Project would provide additional services, is that right, or additional monies toward those services: wastewater, drinking water, those type of things. Is that accurate?

Dr. AHTUANGARUAK. Yes.

Mr. TIFFANY. Yes, OK. Thank you very much, Doctor. I appreciate those answers.

I would just like to comment—I don't know if you all remember Copernicus. Copernicus advanced the theory that the world was round, that Earth was round. He was excommunicated from the Catholic Church, who was the arbiter of truth at that point back—what was that, 500, 600 years ago, something like that. When you say science is consensus, science is not consensus. It is a little bit like Dr. Fauci saying, "I am science." And science is not consensus. Just go back to Copernicus, who stood against the wind and said, yes, the world is round. And he stood against all the leading scientists at that time.

Dr. Dessler, why has Europe failed? They are having an incredible energy crisis at this point. They did the big conversion, much like California is doing now, and they are having skyrocketing energy prices. Some people are questioning whether they are going to be able to heat their homes. Why have they failed when they went to renewables?

Dr. DESSLER. Yes, that is an excellent question. The problem is the Ukrainian war. They are relying on Russian—

Mr. TIFFANY. OK.

Dr. DESSLER. Can I finish with the answer? The Ukrainian war is a fossil-fueled war. Putin invaded because he didn't think people would respond because he knew he had their hands around their necks. And that is the problem with needing fossil fuels.

Mr. TIFFANY. Sure. But the problem started before then. If you go to England, where they also have made this so-called transition, this started before the invasion of Ukraine.

Dr. DESSLER. Yes, OK. If you go back in time—

Mr. TIFFANY. I want to ask another question here, Dr. Dessler.

Dr. DESSLER. I would be happy to respond to that point, though.

Mr. TIFFANY. I appreciate it.

Dr. DESSLER. Maybe someone else will ask me that question.

Mr. TIFFANY. For Ms. Hopper, one of the No. 1 killers of endangered species and threatened species at this point is solar panels and wind turbines. Is there anything being done about that by the industry?

Ms. HOPPER. Yes. Actually, our C3 just released a report today about the cohabitation and the ways in which solar panels in particular—I can't speak to the wind—but the solar industry is mitigating. There is a lot of work being done, and I think it is based on some of the science and the data that we spoke about earlier.

Mr. TIFFANY. Because didn't they—I remember the—I hope I pronounce this word right—the Ivanpah Project out in California, they talked about, I think they call them flamers, is that right,

where birds fly into a solar array and they get fried. Is that still happening?

Ms. HOPPER. So, I believe, that was a concentrated solar power project. That is not the technology widely used in the United States today. That represents a very tiny percentage of solar. I think that was a different issue then. But we certainly remain committed to building and maintaining environmentally sensitive and responsible projects.

Mr. TIFFANY. Just like you are committed not to get solar panels from China, but we continue to get them.

I am going to close with this—

Ms. HOPPER. We don't actually get a lot of solar panels from China, if you look at our imports.

Mr. TIFFANY. I only have about 30 seconds left. So, let's listen to what the previous questioner said, "We have this decade, we have this decade, or we are going to see the end of the world as we know it." Remember back in 1975, the cover of *Newsweek* and *Time*, it said global cooling is going to end the world. As we know it, we are going to see mass global starvation by the year 2000, as a result of global cooling. Now it is global warming.

We have a former vice president who said the North Pole polar ice cap will be gone. He said that in 2009. He said by 2013. We continue to see this the-sky-is-falling attitude, and the American people, they see through it.

I am going to yield back. I wish I had a lot more time to ask questions of the witnesses that are here, but I will have to yield back.

Dr. LOWENTHAL. Thank you, Representative Tiffany. I believe there are no other Members present at this moment, so I am going to conclude by recognizing myself.

Mr. STAUBER. Mr. Chair, we do have Chair Grijalva here, too.

Dr. LOWENTHAL. Chair Grijalva, I am going to recognize you for 5 minutes of questions.

Mr. GRIJALVA. Thank you, Mr. Chairman, and thank you and the Ranking Member for the hearing on this bill.

And the motivation behind the bill is exactly what other Members said earlier in their questioning, it is about accepting a fundamental reality. It is accepting the reality that public lands and waters are a quarter of the contributors to carbon emissions and greenhouse gas. And the reverse of that is, we can be a quarter of the domestic solution in beginning to turn that and to reach Biden's goals.

The intent of the legislation that we are discussing this morning is pretty simple to me: mandating the Interior Department to have a responsibility to the public to demonstrate whether fossil fuel development on U.S. public lands and waters is undermining the country's climate goals. If the Department determines that more fuel fossil leasing and permitting will prevent the United States from meeting our emissions targets, then we should not be expanding coal, oil, or gas development. I really do think that is it, and it is that simple, and that is the approach of the legislation because, with all due respect to my colleagues on the other side of the aisle, my Republican colleagues, we have gone through various issues.

Throwing the word “extremist” around has become convenient lately in our dialogues. But nevertheless, we have gone around since I have been on this Committee on the issue of climate change. First, outright denial by Republicans—it doesn’t exist. Watch the snow melt in my hand analogies, and then we move on. Then there was just simply ignore it. We have the power right now. We have majority here or there, and let’s just ignore it. Then it became about avoidance. But like it or not, the overwhelming, conclusive, realistic, fact-based, and empirical information about the state of our climate and this world is that we have to do something about it.

So, what is the next strategy that comes along? Delay. Can’t do it now. Gas is too high. Can’t do anything now, need to wait for China, India, the developing world, and the poor countries, and the Third World to have stringent standards themselves. We shouldn’t do anything until that happens. We should be exporting, and that way we create a basis for creating and strengthening NATO and national security. Those are not facts. That is political. That is political commentary.

The reality is that we are going to go through a transition in this country, Mr. Chairman. And let me ask two of the witnesses.

Dr. Dessler, this transition, we can either move in the direction that this legislation addresses with discussion and compromise at some level, or we can continue to delay and ignore. And then there is going to be a transition. This could be a transition that we time and have some control and some investment in, or it could be a transition in which we leave the majority of the American people behind to see how they survive while we go forward, because science tells us, instinct tells us, time tells us that that is the direction that we are going.

Could you speak to those two? And which is the most devastating to this economy of ours? Take a present snapshot or a future snapshot of that economy. If the transition is sharp and painful, or if the transition is this one that talks about study, planning, management going forward.

Dr. DESSLER. Right. So, we have a lot of experience that abrupt transitions are bad. And I do think that there—I agree with you that there will be a transition of renewable energy occurring at some point, because the impacts of climate change will simply not be acceptable to people, and the price of renewable energy will continue to drop and continue to drop. In fact, we see the transition happening today, just not—

Mr. GRIJALVA. Let me ask—because I wanted to ask Ms. Hopper.

Is there an even playing field between—on public lands and waters in the development and analysis—and the development of alternative renewable energy and the fossil fuel industry and their practice on public lands and waters? Are we talking about an even playing field, or a disadvantage/advantage?

Ms. HOPPER. No, we do not have an even playing field. They are much more resourced, much better staffed, much more historical competency in the agencies, and much more land available for development.

Mr. GRIJALVA. We have subsidized the fossil fuel industry for decades upon decades in this country on our public lands, and with

minimal royalties, minimal consequences, no cleanup, no mitigation. And I think it is time that we looked at making an investment in the transition that is going to occur, whether people like it or not.

I just want to be at the forefront to be able to say that that transition needs to be fair, and it can't leave the majority of the American people behind while those that can afford it take care of themselves.

I yield back. Thank you, Mr. Chairman, for the indulgence.

Dr. LOWENTHAL. Thank you, Chairman Grijalva.

I want to clarify something and understand from the testimony. I want to ask Dr. Dessler.

Would you like to respond to Mr. Stein's assertion that there is no climate crisis?

Dr. DESSLER. Well, what the science clearly shows us is that the Earth is warming, humans are to blame for the warming, and the magnitude of future warming is going to be extremely large. And the economists who look at that, tell us that the cost of that could be extremely excessive.

And I would also point out—to the statement that Mr. Stein made that we can adapt, that there is an enormous amount of suffering embedded in that statement. If you look at what adaptation really means, it means one of two things: either the government is going to have to pay to help people adapt, higher taxes—but of course, that is not what the people who say let's adapt support. They just support throwing those people to the wolves. I mean, who is going to pay to install air conditioning for cities that need air conditioning? That is extremely expensive.

And adaptation means let's let people suffer. It is exactly the same kind of normalizing suffering that we did during COVID. During COVID, people started dying. It is like, oh, that is too bad. It is going to be exactly the same thing. Oh, these people are suffering. Oh, I mean, what are you going to do? We are going to normalize suffering.

And I think that it is a really a response that, if people actually looked at what the science tells us, they would not accept.

Dr. LOWENTHAL. Dr. Dessler, another question. The Biden administration has set aggressive but necessary emission reduction targets, including a 50 to 52 percent reduction in emissions from 2005 levels by 2030, a net-zero economy no later than 2050.

In your view, are these targets supported by science?

And what are the potential consequences if we don't reduce our emissions in line with these targets?

Dr. DESSLER. So, the world has agreed to aim for targets of well below 2 degrees Celsius, with aspirational goals to reach 1.5 degrees Celsius in the Paris Agreement. I think those targets are consistent with those goals. Those goals are compromises between people who want lower goals and people who don't want such high goals.

But the consequences of exceeding that could be dire. As I said in my testimony, economists have no idea what the cost of this is going to be. And it is easy to say we will adapt. But, in fact, we don't know that that is true. Maybe we will, maybe we won't. And since we have an alternative, renewable energy—which is now our

cheapest energy, let me just emphasize that—and we could easily, at virtually no cost, switch to a grid that is primarily an electrical grid. And we can talk about non-electrical sources if you want.

But, I mean, we can solve this problem. So, I think that these targets are certainly reasonable, and they are consistent with what the world has agreed to for climate targets.

Dr. LOWENTHAL. Thank you, Dr. Dessler.

After listening to the discussion today, I want to return to what is in H.R. 8802. This bill does not actually shut down all fossil fuel extractions on public lands and waters indefinitely.

It is true that, once the bill becomes law, there is going to be a pause on issuing fossil fuel permits and holding fossil fuel lease sales. However, the purpose of that is to give the Interior Department and the Forest Service time to develop a strategy and to analyze whether continued fossil fuel development prevents the United States from achieving our emission reduction goals, which you have just heard from Dr. Dessler are reasonable.

The two agencies and their leadership will be responsible for conducting a fair and thorough analysis. Section 4 of the bill spells out the requirements for this strategy, once the strategy is published. And if it finds that continued leasing and permitting are consistent with the Biden administration's target goals, the Interior Department is free to continue to issue drilling permits and hold fossil fuel leases.

This is what the Republicans have been asking for, in terms of an energy—how do we get there, what is Interior's energy plan. This lays it out.

And I am going to yield back, thank you.

Mr. STAUBER. Mr. Chair, before you close it, may I have 1 minute?

Dr. LOWENTHAL. Yes, you may.

Mr. STAUBER. Mr. Chair, I wanted to thank you. If this is going to be our last meeting as a Subcommittee on Energy and Mineral Resources, I want to thank you for your leadership and your fairness at these hearings. We are going to miss your leadership. But on a personal level, I am going to miss our friendship, and I want you to know that, and I wanted to state that once again publicly. And California is going to miss a great Representative.

And I yield back.

Dr. LOWENTHAL. Thank you, Representative Stauber. That is very kind of you.

But with that, I would like to say—if I can find my notes on it—we are going to conclude this witness panel.

First of all, are there any Members who have not had their 5 minutes, who I did not call upon, and who seek recognition to ask questions now?

Then, I want to thank the witnesses for their valuable testimony and the Members for their questions.

The members of this Committee may have some additional questions for the witnesses, and we will ask you to respond to these in writing.

Under Committee Rule 3(o), members of the Committee must submit witness questions within 3 business days following the

hearing, and the hearing will be held open for 10 business days for these responses.

If there is no further business, without objection, this Subcommittee stands adjourned.

[Whereupon, at 12:34 p.m., the Subcommittee was adjourned.]

[ADDITIONAL MATERIALS SUBMITTED FOR THE RECORD]

**Congress of the United States
Washington, DC 20515**

September 16, 2022

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Haaland:

We write to reiterate our strong support for the Willow Master Development Plan (Willow or Project) in the National Petroleum Reserve-Alaska (NPR-A). The expeditious approval of this crucial project would greatly benefit Alaska, our nation, and the world, while demonstrating the Administration's commitment to addressing inflation, high energy costs, the need for greater energy security, and environmental justice initiatives.

On July 8, 2022, the Department of the Interior (Department or DOI) published a draft supplemental environmental impact statement (SEIS) for Willow. We appreciate the Department's recognition that 45 days provided sufficient time for public comment on the SEIS. After years of study and review, both the Administration and Alaskans can feel confident that the Project will abide by the strictest environmental considerations in the world, while being constructed and operated by a company with an impressive record of safe and responsible development on the North Slope.

Willow will be a significant economic driver for Alaska, creating thousands of high-paying construction jobs, primarily with labor from union workers, and hundreds of permanent positions. ConocoPhillips has already invested more than \$500 million in the development of Willow's leases, which were acquired in 1999 during the Clinton administration, and plans to spend upwards of \$8 billion in total.

The Project will also generate as much as \$17 billion in new revenues for the federal government, the State of Alaska, the North Slope Borough, and communities in and around NPR-A. In fact, the Bureau of Land Management estimated in the draft SEIS that the Project would generate \$3.91 billion in new federal revenue, \$3.54 billion in revenue for the State of Alaska, and \$1.25 billion in revenue for the North Slope Borough.

As Julie Kitka, President of the Alaska Federation of Natives, wrote to you, Willow "could jumpstart our economy with thousands of jobs and be a model in community and environmental stewardship for years to come."¹ Similarly, the Inupiat Community of the Arctic Slope, North Slope Borough, and Arctic Slope Regional Corporation wrote to you that:

"The current development plan for Willow incorporates local knowledge and input, and it was specifically designed to protect surface values and to protect the Inupiat way of life, including subsistence . . . 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

¹Letter from Julie Kitka, President, Alaska Federation of Natives, to the Honorable Debra Haaland, Secretary, U.S. Department of the Interior (Feb. 23, 2022).

elected regional Alaska Native leadership who speak in unified support for Willow, not to outside interests.”²

Those are many more individuals and groups that strongly support the Willow project. For example, it has drawn backing from North Slope mayors and communities, Alaska AFL-CIO, building trades, LIUNA, Alaska’s congressional delegation, and the President of the United States.

In the midst of their strong support, it has been 14 months since a federal court remanded the alternatives analysis to BLM, so it is reasonable for the agency to move forward and complete the permitting process. We believe the final SEIS should identify the preferred alternative; appropriately weight the purpose of energy production in the NPR-A; and recognize the public interest in supporting energy security and responsible resource development. The permitting process must be completed by the end of 2022 at very latest so the project’s proponent can make a final investment decision and hire Alaskans in time for the winter construction season. That decision will not be possible, and none of those jobs will be created, in the absence of a clean and timely Record of Decision (ROD).

We urge the Department to select a preferred alternative for the final SEIS that facilitates at least as much infrastructure and access to North Slope resources as Alternative E, and look forward to the Department’s swift re-approval of the Willow Master Development Plan. This is a pivotal moment for our Alaska and our country, where the timely approval of projects today can assure needed future supply and help us avoid the type of crisis affecting many of our foreign allies.

The economic development and energy security benefits that Willow will provide can be realized through a ROD that is completed in time for this year’s winter construction season to proceed. Alaskans are counting on you to make that happen.

Sincerely,

Lisa Murkowski,
United States Senator

Dan Sullivan,
United States Senator

Mary Sattler Peltola,
Representative for All Alaska

²Letter from Morrie Lemen, Executive Director, Inupiat Community of the Arctic Slope; Harry K. Brower, Jr., Mayor, North Slope Borough; and Rex A. Rock, Sr., President and CEO, Arctic Slope Regional Corporation, to the Honorable Deb Haaland, Secretary, U.S. Department of the Interior (July 21, 2022).

HECHO
(Hispanics Enjoying Camping, Hunting, and the Outdoors)

September 20, 2022

Hon. Alan Lowenthal, Chairman
 Hon. Pete Stauber, Ranking Member
 Subcommittee on Energy and Mineral Resources
 House Natural Resources Committee
 1324 Longworth House Office Building
 Washington, DC 20515

Dear Chairman, Ranking Member Stauber, and Members of the Subcommittee:

As an organization working to empower Hispanic leaders to engage their communities in the conservation of our public lands in Arizona, Colorado, Nevada, New Mexico, and Utah we write to request your assistance in ensuring that the Public Lands and Waters Climate Leadership Act of 2022 is passed out of committee. The Public Lands and Waters Climate Leadership Act of 2022 prohibits new federal fossil fuel leasing and permitting until the Department of Interior (DOI) and the U.S. Forest Service (USFS) demonstrate that life cycle emissions from additional oil, gas, and coal development are consistent with our nation's 2030, 2035, and 2050 climate change targets. The bill also requires DOI and USFS to develop, publish, implement, and regularly update a comprehensive strategy to guide the agencies' efforts to reduce GHG emissions and to keep the public informed of the progress. This is an essential piece of legislation in preventing the worst impacts of climate change from occurring.

The climate crisis is an existential threat to the American economy and national security, the health and well-being of all people, wildlife, our lands and oceans, and future generations. Our community members in northern New Mexico are still experiencing the impacts of the Hermit's Peak/Calf Canyon fire through flooding that is wreaking havoc on water reservoirs and structures. In a review of this largest wildfire in New Mexico's history, Forest Service Chief Randy Moore said that "[c]limate change is leading to conditions on the ground we have never encountered before." It is imperative to prevent the worst climate impacts from occurring. To do so, the U.S. must achieve our emissions reduction targets which are supported by top climate scientists, including:

- Reducing net U.S. GHG emissions by 50–52 percent from 2005 levels by 2030;
- Achieving 100 percent carbon-free U.S. electricity by 2035; and
- Achieving net-zero emissions across the entire U.S. economy by 2050.

The 2050 net-zero goal is based on multiple Intergovernmental Panel on Climate Change reports, which find that limiting global warming to 1.5 degree Celsius requires the world to reach net-zero carbon dioxide emissions by 2050 and net-zero emissions of all GHGs roughly a decade after that. Despite these aggressive, science-based targets, DOI and the USFS have not yet begun to develop a strategy to phase out oil, gas, and coal leasing and production on America's public lands and waters.

Together, Congress has achieved major policy victories and made historic investments in clean energy, conservation, and environmental justice communities, chiefly through the enactment of the Infrastructure Investment and Jobs Act and the Inflation Reduction Act, the most significant climate legislation in history. HECHO is proud to have supported and advocated for these pieces of legislation, but more needs to be done. The management of our public lands and waters is outdated and DOI and USFS have a responsibility to demonstrate whether fossil fuel development on U.S. public lands and waters is compromising the country's climate goals.

The Public Lands and Waters Climate Leadership Act will ensure U.S. public lands and oceans are part of the whole-of-government approach to solving the climate crisis and achieving our emissions reduction targets, not undermining these efforts as an unchecked source of fossil fuel pollution.

On behalf of HECHO, we thank you for your attention to this important issue.

Sincerely,

CAMILLA SIMON,
Executive Director

Submissions for the Record by Rep. Stauber

**ALASKA NATIVE ORGANIZATIONS
LETTERS OF SUPPORT FOR THE WILLOW PROJECT**

**NORTH SLOPE BOROUGH
Office of the Mayor**

April 15, 2021

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Comments of the North Slope Borough on the U.S. Department of the Interior's Public Forum on the Federal Oil and Gas Program

Dear Secretary Haaland:

The North Slope Borough (Borough) submits the following comments in response to the U.S. Department of the Interior's (Department) March 25, 2021 virtual forum regarding the federal oil and gas program.¹ I sincerely hope that the Department will recognize, in its Interim Report and in its future work with respect to this program, the complicated but critically important role that oil and gas has played in advancing the interests of the people of the North Slope. I invite you and your team to begin a collaborative and meaningful discussion with the Borough and our residents about the future of oil and gas on the North Slope of Alaska. I believe that it can be a productive discussion.

North Slope Borough

The Borough is the regional government for eight villages spread across northern Alaska. The Borough's jurisdiction stretches from the United States-Canada border across to the western border of Alaska, and its coastline extends across the Beaufort and Chukchi Seas. It is the largest municipality in the United States by size. The Borough's jurisdiction includes the Inupiat villages of Anaktuvuk Pass, Atkasuk, Kaktovik, Nuiqsut, Point Hope, Point Lay, Utqiagvik (formerly Barrow), and Wainwright, as well as the Prudhoe Bay oil field, most of the National Petroleum Reserve-Alaska, and much of the Arctic National Wildlife Refuge, including the coastal plain.

Approximately three-quarters of the Borough's nearly 10,000 permanent residents are Inupiat. The Inupiat and other indigenous peoples of the region have depended on the subsistence resources of the North Slope of Alaska's lands and waters for their physical health, cultural well-being, and survival for thousands of years. Over 98% of Inupiat households utilize subsistence foods, and the social fabric of our communities revolves around subsistence. The importance of this subsistence way of life to our communities goes beyond the need for food. Our unique Inupiat culture, our traditions, and our links to our ancestors and history are tied to our subsistence lifestyle, to our custom of sharing with others, and to celebrating our connection to the land and the ocean.

Oil and gas resources developed on the North Slope come from our backyard—a place that has sustained our people for generations. The Inupiat have strong cultural and subsistence ties to the areas where oil and gas development on the North Slope occurs. We benefit from oil and gas development but also have considerable risks. Thus, any form of development on this land demands careful and balanced stewardship. We consider ourselves to be the first and rightful stewards of these lands.

¹We understand that the Department is seeking public comments to inform its review of the federal oil and gas program as called for in Executive Order 14008, and that such information will help inform an interim report by the Department that "will include initial findings on the state of the federal conventional energy programs, as well as outline next steps and recommendations for the Department and Congress to improve stewardship of public lands and waters, create jobs, and build a just and equitable energy future." Such a report must include the voices of the people of Alaska's North Slope.

Historical Significance of Federal Involvement in Oil and Gas Development on the North Slope

Over the last 150 years, the North Slope of Alaska—land inhabited by the Iñupiat people for thousands of years—has been parceled out to serve the interests of government, industry, and conservation. The United States purchased Russia's property interests in Alaska in 1867. In 1923, the United States set aside 23 million acres of the North Slope—an area the size of Maine—as the Naval Petroleum Reserve No. 4. Today, that area is called the National Petroleum Reserve-Alaska, or NPR-A, and pro-industry and pro-conservation groups are locked in a never-ending fight to advance their competing interests in this land.

In 1960, the Department set aside land in northeastern Alaska, which in 1980 became the 19 million-acre Arctic National Wildlife Refuge, or ANWR. ANWR covers an area roughly the size of South Carolina. Whatever this Administration may think about proposals to develop oil and gas resources in ANWR, that area has long been claimed by the United States and outside groups for conservation without the consent or even meaningful consultation of the Kaktovikmuit—the Native people who actually reside within ANWR, or other North Slope residents.

Alaska became a state in 1959, and the federal government granted the new state an entitlement to 102 million acres of land. In 1968, oil was discovered at Prudhoe Bay, and the state selected the land at Prudhoe Bay over the objections of the Iñupiat people who had inhabited those lands.

In 1971, Congress passed the Alaska Native Claims Settlement Act (ANCSA). This Act allowed Alaska Natives to select and acquire 44 million acres of land around the state but were also preventing from selecting land at Prudhoe Bay because of the State's previously selection. Also, the federal government had already set aside the NPR-A and ANWR, even though these places had for thousands of years been home to the Iñupiat people of the North Slope.

Because the federal and state governments had already claimed Iñupiat land and resources, the Borough's first mayor and the founder of the Inuit Circumpolar Council, Eben Hopson, worked with other Iñupiat leaders to create the North Slope Borough, a home-rule municipality that gave our people the ability to tax oil and gas infrastructure and thereby benefit from the resources being developed in our backyard.

Tax revenues collected by the Borough have for almost 50 years enabled the Borough to provide basic services, which are frequently taken for granted in most other communities in the United States, to the eight villages on the North Slope. Oil and gas tax revenues support health clinics, schools, our tribal college (the only tribal college in Alaska), water and sewer infrastructure, search-and-rescue services, and other essential services in all of our villages.

In a speech he gave in 1976, Eben Hopson talked about the discovery by the federal government of natural gas near Utqiagvik, formerly Barrow. The federal government had created the Naval Petroleum Reserve in 1923 and, within the Reserve, the Navy established a small research facility near Point Barrow. Exploratory drilling led to the discovery of natural gas in 1949, and a gas field was developed near the community. Natural gas was used to heat federal buildings like the hospital, the Bureau of Indian Affairs school, and the Naval Arctic Research Laboratory. But the Navy did not allow the community of Barrow to use the gas to heat their homes.

In his speech, Eben Hopson spoke about the "long, frustrating, 12-year struggle to get permission to hook our homes in Barrow to gas mains that crisscrossed Barrow through our back yards." Although it sounds incredible today, the Navy refused to let the residents of the Native village use the natural gas that came from our own backyard to heat our homes. It took an act of Congress in 1963 to allow the Native people of Barrow to buy their own natural gas back from the federal government.

The point of telling this history is obvious: the North Slope oil and gas resources literally come from our backyard. The development of those resources has had an overall profound, positive impact on our communities for 50 years. We don't have urban sprawl or malls or factories, and we don't want them. But we do want to ensure that our people continue to derive benefit from our land's natural resources to sustain our communities and enable our participation in a modern economy. Revenue from oil and gas development has been invested and will continue to be invested in the immediate and long-term survival of our communities. It is fundamental to our economic survival; it may not always be that way, but it certainly is true today.

Importance of Oil and Gas Development to the Borough and Its Residents

Responsible oil and gas development is essential to the economic survival of the Borough and its residents. Oil and gas activities are the primary economic generator for our region, and North Slope oil and gas development is by far the most significant source of funding for the Borough's community services and infrastructure. The Borough's primary source of revenue is taxes levied on oil and gas infrastructure, such as processing equipment, pipelines, and other facilities. For example, in 2016, the Borough received approximately \$373 million in oil and gas property taxes, accounting for 97% of the \$386 million in total property taxes collected by the Borough that year. In 2017, oil and gas property taxes accounted for 95% of the Borough's \$392 million in total property tax receipts.

As noted above, these tax revenues enable the Borough to invest in public infrastructure and utilities (including reliable sewer, water, and heat) and to provide essential services to our eight communities, including education (e.g., Alaska's only tribal college), health (e.g., clinics in each village, hospitals, schools, and increased sanitation), and emergency services (e.g., aircraft and crew that conduct regular medevac and search and rescue operations throughout the North Slope). These revenues support our Department of Wildlife Management, through which we deploy significant biological and traditional expertise to gather information on important subsistence species and on the land and water that is used to protect our residents' cultural and subsistence resources and to balance our cultural and nutritional needs with development of oil and gas resources. In addition to providing these services, the Borough creates employment opportunities for local residents; the local government sector (primarily, the Borough government) is the largest employer of North Slope residents.

In addition to tax revenue, the Borough and its residents benefit from the generation of royalty revenue sharing available to fund the NPR-A Impact Grant Program, which administers grants from federal revenues from oil and gas activities within the NPR-A, which are used to offset development impacts or improve communities impacted by development. Such grants are available to North Slope municipalities, including both the Borough itself and its incorporated cities. These grants are of significant benefit to the local communities.

For example, over the past ten years alone, the Borough has received almost \$30 million in NPR-A Impact Grants, which it used to fund dozens of projects related to safety, local government, infrastructure, wildlife and fisheries management, environmental health, workforce development, subsistence, planning, and social and cultural programs. A few highlights include:

- \$8,707,798—Community Winter Access Trails: to design, construct, monitor, and maintain the North Slope Borough Community Winter Access Trails (e.g. packed snow trails) because there are no roads connecting most of our communities with the rest of the state or country. Our efforts include support for safe travel and an inspection program within the NPR-A villages, documentation of data needed to support lower cost connectivity for village residents to the state road system, and quantifying the potential benefits of establishing seasonal trails for all NPR-A communities.
- \$2,750,000—Naval Arctic Research Laboratory Road: to relocate a portion of Stevenson Road which provides access from the City of Utqiagvik to the Naval Arctic Research Laboratory area complexes, including Illisagvik College and subsistence sites beyond.
- \$1,187,500—Area-Wide Air Quality Study: to focus on several aspects of air quality and air quality monitoring by collecting baseline data in the NPR-A impacted communities.
- \$1,400,000—NPR-A Village Comprehensive Land Use Plans: to create and update comprehensive plans that serve as a guide to the local governments when they are making decision on budgets, ordinances, capital improvements, zoning, and subdivision matters related to the community.
- \$1,174,100—EMS Equipment Upgrades & Emergency Training Equipment: to support emergency medical services, fire protection, and search and rescue capabilities.
- \$682,000—Inupiat Language Revitalization: to revitalize, save, and sustain the Inupiatun dialect by building greater awareness of the status of North Slope AE6upiatun, conduct community gatherings in the NPR-A villages, develop after-school language program, quarterly seminars supporting Inupiatun fluency, and develop assessment tools to measure language learning and language loss.

- \$377,500—Student Outreach/Science Education for NPR-A Villages: to enhance the critical education of students in the North Slope NPR-A villages regarding vital subsistence resources and scientific and traditional knowledge studies conducted by the NSB Department of Wildlife Management as a means of building much needed capacity in the NPR-A villages.
- \$300,000—NSBPD Training & Personnel for NPR-A Impacted Communities: to provide police officers for the five NPR-A villages.
- \$300,000—Health Impact Assessment—Mental Health: to provide baseline data for future mental health impact-related studies of residents across the North Slope Borough that are within the NPR-A communities.
- \$250,000—Monitoring Teshekpuk Caribou Movements with Satellite Telemetry: to monitor the movement and seasonal distribution of the Teshekpuk caribou.

The benefits to the Borough and our residents from oil and gas development goes beyond direct financial support from tax revenue and Impact Grants. The Borough coordinates with local, state, tribal, and federal entities to inform decision-making regarding new oil and gas development, efforts to mitigate the impacts of development on Borough residents and resources, and efforts to ensure that development provides ancillary benefits in the form of infrastructure and other benefits for our residents.

Additionally, infrastructure investments associated with oil and gas development sometimes involve new roads and local facilities that provide tangible benefits to our residents. On the North Slope, access to subsistence areas and connectivity provided by roads is viewed by many residents as a significant benefit. For example, roads associated with industrial development near the Borough villages of Utqiagvik and Nuiqsut have improved the ability of our residents to pursue subsistence opportunities.

Exploration and development activities increase employment opportunities for the residents of Borough villages. Currently, economic opportunities in our communities are limited due to their isolated locations. Development on the North Slope brings jobs to the Borough's communities, including for Borough residents. More than one-third of jobs held by Borough residents are directly or indirectly supported by the oil and gas industry.

Finally, oil and gas development and exploration serve as economic multipliers on the North Slope. Oil and gas activities increase household income for local residents employed by industry or for whom employment is supported by tax revenues. In addition, industry often contracts with Alaska Native corporations, and local shareholders of these Native corporations benefit from employment opportunities, dividend income, and the myriad investments of the Native corporations in the social, cultural, and economic welfare of the communities.²

Impact of Executive Order 14008 on the Borough

There is no question that federal, tribal, state, and local governments all play a role in protecting public health. There is no question that curbing the impacts of climate change is an important piece of the federal government's public health responsibilities. However, actions that unreasonably prohibit, restrict, or delay oil and gas development on the North Slope will have a significant negative impact on the Borough's economy and our ability to generate tax revenue to provide critical services, including health and educational services, to our residents.

The potential loss of tax revenue and NPR-A Impact Grants would directly and significantly impair the Borough's ability to provide essential government functions, support and grow our economy, provide increased opportunities for our citizens, and provide for the health and well-being of our residents. Further, loss of economic activity on the North Slope means lost jobs and opportunities for our residents in an area of the country that already struggles with significant unemployment.

The Borough relies on the construction of new oil and gas infrastructure to support the continued generation of critical tax revenues for the Borough. As existing oil and gas production declines in the legacy Prudhoe Bay fields, new sources of revenue generated by new projects, such as ConocoPhillips' Willow Project, will allow

²For example, ConocoPhillips is utilizing local Alaska Native corporations to perform work related to the Willow Project in the NPR-A. Local corporation Nanuq Inc. (a wholly owned subsidiary of Kuukpik Corporation, Nuiqsut's local village corporation established pursuant to ANCSA), employs Nuiqsut residents and serves as the Willow Project's ice road construction contractor. In addition, staking and survey work for the ice road is performed by UMIAQ Design, LLC (a subsidiary of Ukpeagvik Inupiat Corporation, Utqiagvik's local ANCSA village corporation).

the Borough to maintain essential municipal services, including health and educational services, for our residents and communities.

The Borough participated as a cooperating agency with the federal government in the development of the Environmental Impact Statement for the Willow Master Development Plan.

Through numerous meetings and workshops, we assisted in the development of the alternatives, required operating procedures, and best management practices for mitigating impacts to renewable resources for the Willow Project. The Bureau of Land Management did an exceptional job throughout this process in its outreach to local entities. Furthermore, the Willow Project is a great example of responsible oil and gas development. It is land based development typical of the North Slope, which will be connected to existing infrastructure and the Trans-Alaska Pipeline System. For all the reasons noted above, The Willow Project will benefit the Borough and support our ability to maintain essential municipal services to our residents and communities. For these reasons, we have intervened in the legal challenges to the Willow Project from outside groups that do not understand or appreciate the mitigation measures and planning that went into this project, as well as its importance to North Slope's residents. We look forward to working with the Department of the Interior in this litigation.

Conclusion

The Borough welcomes the opportunity to submit comments to the Department on its Public Forum on the Federal Oil and Gas Program. We encourage the Department to regularly and meaningfully engage with the Borough as it moves forward in its evaluation of the federal oil and gas program and other activities and decisions that impact our communities and subsistence resources. The Department could benefit from the unique perspective of the Borough and our residents about our lands, waters and other resources.

Nearly three-quarters of Borough residents are Iñupiat. The Iñupiat have strong cultural and subsistence ties to these lands and have a vast knowledge about the area because we have depended on the subsistence resources of the North Slope's lands and waters for our physical health, cultural well-being and survival for thousands of years. We rely on responsible and balanced resource development in order to support economic and infrastructure development opportunities, and access to services and the provision of employment and subsistence benefits for our residents. The Department must consider the real-world impacts of its decisions and hear from the people who will be directly implicated by those decisions as it considers its responsibilities under Executive Order 14008. We call on the Department to actively engage with the people of the North Slope as it considers changes to programs and policies that effect the everyday lives of our residents.

Sincerely,

HARRY K. BROWER, JR.,
Mayor, North Slope Borough

August 1, 2022

Stephanie Rice
 Natural Resources Specialist
 BLM Alaska State Office

Re: Willow Master Development Project Draft Supplemental EIS Comment Period

Dear Ms. Rice,

I am writing to you today as an Inupiat, resident of the North Slope, the North Slope Borough (NSB) Assemblyman and President to the Assembly during the NSB Planning Commission hearing on the Re-Zone for the Willow Development Project in the National Petroleum Reserve-Alaska (NPR-A). I am urging the Bureau of Land Management (BLM) **to not extend the public comment period beyond 45-days** for the Willow Master Development Project (Willow MDP) Supplemental EIS as so many environmental organizations are requesting. In reviewing the Supplemental EIS (SEIS) I have found that the BLM has done an excellent job in identifying NEW and UPDATED information in the SEIS to address the three items that were remanded to the BLM through the U.S. District Court of Alaska. The BLM has also presented a new alternative, Alternative E, that encompasses the new and updated information presented to the agency since the prior EIS, most of the new data responds to the items in the remand but other items reflect local municipal decisions that were made by the North Slope Borough after the FINAL Willow MDP EIS was published.

Based on my experience as an Assemblyman and resident of the North Slope of Alaska, I can say that the Willow MDP has gone through an extraordinary amount of public process starting with the 1998 NPR-A Integrated Activity Plan-EIS and following 1999 Lease Sale and continuing through to the 2013 NPR-A Integrated Activity Plan-EIS (NPR-A IAP-EIS) approved under Secretary of the Interior Salazar through to the recent 2022 decision by Secretary of Interior Haaland to approve the 'No Action Alternative in the 2022 NPR-A IAP-EIS thereby restoring the outcomes of the 2013 NPR-A IAP-EIS. It is important to recognize that there are many people from the North Slope either as individuals, members of the communities, or elected officials who have worked hard with BLM to ensure that the North Slope is heard—therefore engagement since the 1998 NPR-A IAP-EIS is important to understand. Ms. Rice, you have been around our people long enough to recognize that we are a story-telling culture and as such we have long and fast memories. We have built protections into the various NPR-A Integrated Activity Plans to ensure our lands, subsistence, and culture are respected and represented in the documents—to us these are living documents that have grown more comprehensive overtime. We, residents of the North Slope of Alaska, remain committed to our involvement because these are our homelands—these are the lands that we depend on for our sustenance through subsistence. We have also found that development can be a benefit to our subsistence activities by providing us access for subsistence. As the BLM states in prior decisions these are countervailing impacts that benefit us.

Many of us who engaged in the 2013 NPR-A IAP-EIS are aware that the 2013 Record of Decision was one of many compromises between our people and communities, outside environmental groups, and industry. We applauded Secretary Salazar and our own NSB mayor, Mayor Itta, at the time because it represented a balanced approach toward leasing and adding many new stipulations and required operating procedures into oil and gas leases sold. The NSB played an enormous role in these negotiations and compromises. Since 1998, our region has been engaged in almost non-stop public engagement on NPR-A projects and plans and the area now called Willow has always been part of the analysis and process.

The BLM process is only one of the processes our people, local governments, and entities engage in. Through the North Slope Borough's Planning Department and Planning Commission, we have our own processes to evaluate projects, accept public input, and apply our own mitigations on both exploration and development projects within our region.

Fifty years ago this year, the North Slope Borough was formed and is currently the largest municipal government in the United States. Through the foresight of our past elders, we have been able to achieve many things but foremost of our accomplishments is the NSB's ability to move our communities from third-world to first-world conditions in just 50 years. Is everything perfect? Not necessarily, but through these changes our communities we have been able to increase the average life span of our Inupiat people by over 13 years. We do this through the revenue generated

from property taxes. Over 95% of our tax revenue is generated through oil and gas infrastructure. I understand climate is changing, we see it every day, we are at the forefront of climate change with a warming arctic, but our world has not yet weaned itself from fossil fuels and therefore the Willow Project is critical for our community's future. It allows us time to focus on diversifying our local economy for long-term sustainability.

Our collective engagement on the project was first through its exploration program and plans and subsequently in the Willow MDP after ConocoPhillips Alaska Inc (CPAI) submitted to your agency an application for development. The NSB Planning Department has a permitting role in the project and through them and the operator, CPAI our Assembly received regular updates on the project over time. These updates are meant to be informative as well as to allow our Assembly members to ask questions and raise concerns and issues we hear from our community residents. Our borough was formed to provide local government over our region, and I feel that decisions about development in our region should weigh the positives that it allows our people through providing a better quality of life, such as, clean water and sanitation, local healthcare, emergency services, low cost housing, and much more—these are things that the NSB provides to our communities, this doesn't come from the federal or state government. For people to object to our economy and ability to provide for our residents is offensive to me. We are asking that 0.1637% of the 23 million acres within the NPR-A be allowed for development to provide for these services for our next generations.

Under North Slope Borough Municipal Code §19.60.060 the NSB has the authority to rezone areas of the North Slope under Alaska Statutes AS 29.40.010 and 29.040(a). As a result, anytime a development occurs in an area not designated as resource development the NSB Planning Department engages in an exhaustive re-zone analysis to ensure that the lands meet the objectives and goals of the NSB Comprehensive Plan; that growth and development of the Borough is in accordance with the values of its residents; to identify and secure beneficial impacts of development; to identify and avoid, mitigate or prohibit negative impacts of development; and to ensure all future development is of the proper type, design and location and is served by a proper range of public services and facilities. This requires both public community meetings and meetings and outside engagement of consultancy to achieve and outcome that provides a robust analysis of the proposed project for the development for revision of the NSB's Master Plan for rezoning. As an Assemblyman for over 14 years, I have a fiduciary responsibility to understand and work with our administration to implement to the NSBMC to be the best of our collective abilities.

I state this because the Willow MDP is a project that required a rezone of the area under the NSB rezone process. Under §19.30.010 the Assembly shall review and act upon all applications for rezoning and amendments to this title. The Assembly's decision shall be final with respect to any rezone within the NSB boundaries. In May 2020 the NSB Planning Department held a pre-application meeting with CPAI to initiate the re-zone process of 37,654 acres of land to Resource Development District. The process of the NSB Planning Department is to develop a Master Plan for the project to ensure that the project meets the objectives and policies of the NSBMC §19.70.050—Coastal Management and Area-wide Policies to protect subsistence, cultural, compliance with state and federal regulations, and to minimize negative impacts to our region. This process included a public comment period and meetings with key stakeholders in Nuiqsut to get input.

Following the work of the Planning Department and through the separate meetings of the Planning Commission, on January 5, 2021, the Assembly hearing started and continued into January 6th and 7th. As President of the Assembly, it was critically important that the Assembly listen to all stakeholders within the North Slope, and I therefore lifted our normal three-minute limit for public comments, as provided for under §2.04.080(B)(2), feeling this imposed undo time constraints on our public speakers on a project of this nature. After three days of very extensive testimony on certain issues with the rezone from the community of Nuiqsut, the Assembly directed the Planning Department to meet with constituents from Nuiqsut and CPAI to address ways to mitigate the concerns from the community. On January 15th, the parties presented changes to the project to the Assembly. After a multi-day thorough vetting of interested parties, the Assembly received revised Ordinance 75-06-75 with changes to the Master Plan and additional stipulations. The revised negotiated Ordinance and Master Plan was approved through a majority vote by the Assembly.

It is important for BLM to take all the North Slope Borough's involvement and efforts into account when evaluating whether to extend the public comment period for the Willow MDP SES. All our involvement, public participation, working with the BLM as a Cooperating Agency on both the Willow MDP EIS and Willow MDP SEIS should be meaningful to the process. Our local input should carry weight over the influence of outside parties from both the environmental organization but also from the U.S. Congress. We are elected officials of our municipal government and as such we are required to address issues within our region and on our ancestral lands—we are the ones who know what works and doesn't work within our boundaries. When the North Slope Borough, the Inupiat Community of the Arctic Slope, the Native Village of Nuiqsut, and the City of Nuiqsut are on the cover of the Draft Willow MDP SEIS that says our region was engaged and involved in working with the BLM to address the issues directed by Judge Gleason in her Remand which caused the Supplemental EIS to be conducted.

Through our review of the Willow MDP SEIS and the new Alternative E, many of the items in the Alternative E, are aligned with NSB Ordinance 75-06-75 and accompanying Master Plan. As an example, the new Alternative E and our Master Plan are aligned in the removal of BT4 drill site and delaying approval of the BT5 drill site. These were issues that we heard about from Nuiqsut and through this alternative it appears that BLM has mitigated those concerns.

I want to reiterate to you that due to the above and the comprehensive nature of our involvement through our own municipal code and as a cooperating agency ***there is no need to increase the public comment period beyond the current 45-day period for the Draft Willow MDP and there is certainly no need to schedule meetings in Washington DC over our region.*** The Biden Administration has made several statements about increase and strengthening its bonds with indigenous peoples and to ignore our participation and involvement in NPR-A decisions over the last 24 years runs counter to this .

Sincerely,

JOHN HOPSON, JR.,
*North Slope Resident, NSB Assembly Member,
and Past Assembly President*

**IÑUPIAT COMMUNITY OF THE ARTIC SLOPE
NORTH SLOPE BOROUGH
ARCTIC SLOPE REGIONAL CORPORATION**

July 21, 2022

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 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, Atqasuk, 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 co-operating 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 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 Inūpiat 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.

¹Joshua 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.”).

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.

Sincerely,

Morrie Lemen, Executive Director,
Inupiat Community of the Arctic
Slope

Harry K. Brower, Jr., Mayor,
North Slope Borough

Rex A. Rock, Sr., President and CEO
Arctic Slope Regional Corporation

ALASKA FEDERATION OF NATIVES

February 23, 2022

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: AFN Continued Support for the Willow Project

Dear Secretary Haaland:

On behalf of the Co-Chairs and Board of Directors of the Alaska Federation of Natives (AFN), I write to share our long-standing support for the Alaska Willow Project in the National Petroleum Reserve Alaska (NPR-A).

The Willow project has undergone stringent environmental permitting and a vigorous community engagement process. It was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over two years and included multiple rounds of public comment and public meetings with Alaska Native stakeholders. AFN appreciates the outreach and communication between ConocoPhillips and the Alaska Native community and considers the process a model for other development initiatives.

AFN understands that the need for a proactive whole of government approach to deal with climate change; however fossil fuels will be with us for quite some time to come, and projects like Willow can help bridge the gap. As such, delaying Willow any further will only hinder Alaska's economic recovery. The Willow Project could jumpstart our economy with thousands of jobs and be a model in community and environmental stewardship for future opportunities.

Additionally, the international crisis in Ukraine highlights the Willow project's importance to our national security. The looming invasion of Ukraine by Russia is already stressing global energy markets. The Willow Project is a critical opportunity for the U.S. to expand domestic energy supplies and security while creating economic opportunities to help Alaska recover from the pandemic. As such, I strongly urge you to support the current record of decision and allow the Willow project to move forward as planned and previously approved.

Thank you for your consideration. If you have questions, please feel free to contact me directly.

Sincerely,

JULIE KITKA,
President

ARA—ANCSA Regional Association
ANVCA—Alaska Native Village Corporation Association

February 4, 2021

Hon. Deb Haaland, Secretary Nominee
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Nominee Haaland:

The ANCSA Regional Association (ARA) represents the 12 Regional Corporations created under the Alaska Native Claims Settlement Act (ANCSA) which was approved by Congress and signed into law by President Nixon in 1971. The Alaska Native Village Corporation Association (ANVCA) represents 177 village and urban corporations created by ANCSA. Together these organizations represent over 150,000 Alaska Native shareholders.

We write today to urge the Department of Interior not to delay the ConocoPhillips Alaska Willow Project given the exhaustive and thorough review process it has already undergone, and the urgent need for vetted, economic opportunities for safe development in Alaska.

ARA and ANVCA strongly support responsible resource development in Alaska and are concerned about reports that the DOI intends to, once again, review the EIS Record of Decision (ROD) for Willow, which could delay or defer the project's progress.

There is no basis for further review of the ROD, given the extensive record of public hearings, documented BLM efforts to address all issues raised through public comment, completion of an in-depth environmental analysis, and the over 270 stipulations and best management practices the project will be required to follow. The Willow EIS was performed under the rigorous process in place during the Obama Administration, and was not expedited or granted any special consideration. The EIS took more than two years to complete and the report itself totals more than 2,600 pages of in-depth analysis. Given the extensive nature of the process used to perform the Willow EIS, we request that the Department of Interior not delay the Willow project for further unnecessary analysis, or political rhetoric.

The State of Alaska has been in recession for over five years, well before the COVID pandemic hit, which then caused further negative impacts in every industry important to our state. The federal government should be looking at opportunities to help Alaska respond to these impacts rather than exacerbating them. Delaying a project like Willow, which has already passed a rigorous EIS process, will cause ripple effects throughout the Alaskan economy. This project will support over 2,000 construction jobs and hundreds of long-term jobs, while providing over \$2 billion in revenues to the State of Alaska and \$7.6 billion in federal royalties. For context, \$2 billion is roughly the size of the current budget deficit faced by our state. Revenues received by this project allows our rural communities to receive continued support to schools, health clinics and basic public services like water and sewer treatments.

The Willow Project has passed every environmental and community test put before it and would provide a much-needed economic boost to Alaska. Delaying it any further will only bring more harm to our state. It also harms the economy and budget of the North Slope Borough, the local government most closely impacted by the federal government's decision for review.

Best Regards,

Kim Reitmeier, Executive Director,
ARA

Hallie Bissett, Executive Director,
ANVCA

**CITY OF UTQIAGVIK
CITY OF WAINWRIGHT
CITY OF ATQASUK**

April 26, 2021

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Haaland:

We are writing you today, collectively, as three city municipal Mayors from the North Slope of Alaska representing the communities of Utqiagvik, Wainwright, and Atqasuk—all three located within the boundaries of the National Petroleum Reserve-Alaska or NPR-A. First, as indigenous Alaskan Native Inupiat communities of the region, we would like to congratulate you on your confirmation as the first indigenous woman to be selected for your position—we are truly honored and hopeful that through your position as Secretary of the Department of the Interior (DOI) will have a positive and profound impact on the Inupiat, and all residents, within our region. Your department plays a significant role in Alaska and we trust that we can develop a good relationship with the DOI as we move forward during your tenure as Secretary.

Our region, the North Slope of Alaska, covers approximately 90,000 square miles above the Arctic Circle and is larger than 39 other states. It stretches from Point Hope on the Chukchi Sea in the west to the Canadian Border on the east and encompasses lands north of the continental divide in the Brooks Range. These are our lands and region and are home to eight Inupiaq communities. To provide context, our coastline from Point Hope to Canada, spans a similar distance as the distance from Savannah, Georgia to Philadelphia, Pennsylvania—yet we have a single highway within our region. Conversely, if our coastline were overlain on the west coast, it would cover the distance between Mexico to Oregon. We provide these examples to show you the scale of our region and impress upon you that we do not have intra-region transportation infrastructure like roads and rail taken for granted elsewhere in our country. It has been home to us for more than ten thousand years and our continued inhabitation of the lands within the North Slope has been critical to our culture and survival as indigenous people. The North Slope is also home to the largest municipal government in the United States, the North Slope Borough (NSB), whose municipal powers cover a region greater than the size of Minnesota.

As Mayors we represent the Cities of Utqiagvik, a first-class city incorporated in 1959; Wainwright—a second-class city incorporated in 1962; and Atqasuk, a second-class city incorporated in 1982; all located within the NSB boundaries and hold our powers through the State of Alaska as First-Class and Second-Class Cities under the Home Rule Powers of the NSB.

The NPR-A is our backyard; it provides us with our subsistence resources and our economic sustainability. The eight communities across the North Slope are dependent on the infrastructure the NSB provides for life, health, and safety. The costs of this infrastructure are high and the source of the NSB's ability to provide for our basic needs comes from its taxing authority on oil industry on the North Slope. Since the development of oil in our region we have seen the life expectancy of our people increase by 13 years, on average. This increase in our life span has come through first-world amenities like clean water, sanitation, health clinics, and other essential services. We cannot turn back the clock despite what outside groups would like to see.

We agree that our climate is changing; we are at the forefront of some of these changes and see them daily. Our culture is not one of being victims to circumstances—we are adaptable—and we are realists. We understand that the world is changing, and we want to see changes occur with respect to how we address the changes BUT we believe local indigenous leaders and traditional knowledge needs to make and inform the decisions so as not become victims to sweeping policy changes that will have major impacts on our survivability. The policies through various Executive Orders and Secretarial Orders coming from the Biden Administration can have a greater impact on our communities than changes to our environment will have in the long-term by significantly reducing our local economy, without allowing time or resources to integrate new technologies and diversify.

Our region supports oil development. It was not always this way, and in fact, we fought against development after its initial discovery at Prudhoe Bay. The discovery of hydrocarbons at Prudhoe Bay was the main driver that led to the passage of the 1971 Alaska Native Claims Settlement Act (ANCSA). While ANCSA is a true improvement on the Indian Relocation and Reservation programs utilized elsewhere in America, our forefathers fought against it; the North Slope region was the only region in the State that rejected ANCSA because it took too much and gave too little. Yet after ANCSA was passed, our early leaders, successfully fought for the right to have a significant role and voice in oil and gas development on their traditional land and “have worked hard to balance the health of the environment and culture with the survival of our people and communities.” (Quote from Mayor Brower from Voice press release on EO.) In 1972, the NSB was formed, as a home-rule government to have the ability to exercise planning and zoning, to implement property tax, and to administer schools for its eight communities. In 2020, the cost to the NSB to maintain infrastructure, schools, manage wildlife, and administer its school system cost approximately \$400 MM. The money to pay for these services—in fact, over 95% of the borough funding—comes to the NSB in the form of property tax on oil and gas infrastructure within the borough. This same revenue stream that has modernized the North Slope is passed along and provides benefits to other regions and communities in turn through the revenue-sharing framework set up in ANCSA.

To have policies that would interfere with that revenue source without offering to use alternative sources of economic sustainability would be a sham and a taking—and completely at odds with the Biden Administrations alleged dedication to consultation and equality. We have been ‘playing’ by the federal rulebook since the discovery of oil on the North Slope. In fact, through the NSB Planning and Wildlife Management Departments, we use our traditional knowledge to identify changes in the environment for federal agencies to incorporate into their decision documents. We understand the National Environmental Protection Act (NEPA) and are experts in the process through our borough, tribes, ANCSA Corporations and through the public process. We are sophisticated and we actively participate in many forms throughout NEPA process.

Our City Councils have felt the need, due to the negative impacts, ambiguity, and contradictions in the various President Biden Executive Orders (EO), to pass individual resolutions supporting NPR-A leasing and developments and more particularly projects like the Willow Development (see attached resolutions). These resolutions were passed unanimously and reflect the concerns of our residents regarding our long-term economic sustainability as a region. We have watched EO’s, and Secretarial Orders (SO) get issued that have a significant impact on our region. These EO’s and SO’s significantly undermine our participation in the processes, and we are appalled that your agency, Madam Secretary, is focused more on the environment than on our people. This has long been our experience with the environmental non-governmental organizations (eNGO’s) who have worked hard to erase us from our own homeland.

In fact, your recently issued SO-3352, could cancel our contributions as a region to the 2020 NPR-A Integrated Activity Plan-Environmental Impact Statement (IAP-EIS). This would be a breach of our long-standing relationship with the Bureau of Land Management (BLM) who we have worked with through multiple IAP-EIS’s since the 1999 NPR-A IAP-EIS, over the course of several administrations and have developed a trust in their ability to listen to us as significant stakeholders in the region. While you and your department are raising questions about the process and science of the BLM, we can tell you, having participated in NEPA with the BLM for over 20 years, we did not see any changes, short-cuts, or poor science performed by the BLM in the 2020 NPR-A IAP-EIS and to imply there was undercuts our experience and undercuts your agency. The only thing from our perspective that has changes over time is the number of embedded policy personnel in the DOI that have fought us, as indigenous people, for many years. Executive Order 13175, recently refreshed by President Biden, requires consultation with Indigenous People, the City of Wainwright has >97% Alaskan Native Iñupiat population, the City of Atkasuk has >92% Alaskan Native Iñupiat, and the City of Utqiagvik has >52% Alaskan Native Iñupiat and the NSB represents >78% of the Alaskan Native Iñupiat across the region.

We are very familiar with DOI consultation processes for both tribal and ANCSA entities because we participate in both. The DOI established its ANCSA consultation policy in August 2012 under Secretary Salazar to recognize the differences between tribes and ANCSA corporations in Alaska where we have a different relationship with the land. ANCSA severed our tribal relationship with the land and Congress developed a mechanism to provide lands to the newly formed ANCSA corporations for economic development purposes as payment for the lands. Over time

this created friction between the tribes and the corporations because the federal government's trust responsibilities to tribes no longer extended to the ANCSA corporations. To be clear, tribal members are also shareholders of the ANCSA corporations and both are residents of our cities. Secretary Salazar recognized that, in Alaska, consultation was occurring with the tribes but the tribal entities themselves did not own the land and that decisions were being made on ANCSA lands without their input. We recognize that there are significant differences between tribal consultation and ANCSA consultation policies which is why we used both on the North Slope to assure ourselves that we are being heard throughout the NEPA process and are not being drowned out by the eNGO's—we are diligent in ensuring our concerns are acknowledged and addressed. Both consultation policies require that consultation begins early and is meaningful, that ANCSA consultation will help to ensure that future Federal action is achievable, comprehensive, long-lasting, and reflective of ANCSA Corporation input. This means that consultation must be a deliberative process by the agency. While we are delighted that President Biden re-emphasized EO 13175 we have not felt that the agency, BLM, has neglected its duty for continued and meaningful consultation, in fact, we feel just the opposite.

While we represent all the residents of our region, it is important to point out that a large percentage of our residents are Native Alaskan Inupiat and therefore are also tribal members and are shareholders of ANCSA Corporations. It was a request by the NSB that caused the BLM to initiate the 2020 NPR-A IAP-EIS to address community transportation corridors and other corridors across the NPR-A. The NSB also participated as a Cooperating Agency to review the science and ensure that the needs of the Inupiat were being addressed through mitigation measures.

Under the 2013, NPR-A IAP-EIS based on evidence presented by North Slope leaders, Secretary Salazar directed the formation of the NPR-A Working Group (NPR-A WG). The formation of the NPR-A WG necessitated by the fact that the local voice, the indigenous voice, was being drowned out by the eNGO's in our region. The NPR-A WG is comprised of elected leaders on the North Slope, including the NSB, tribes, cities and ANCSA corporations, and its purpose is to act as an advisory body to the BLM. The objective of the NPR-A WG is to provide a forum for meaningful and regular input regarding the implementation of oil and gas leasing, land use conflicts, scientific studies, special area boundaries, and infrastructure projects supporting onshore and offshore oil and gas development such as production facilities and pipelines. We were elated to have a special private forum to engage with the agency, and we, as a region, were able to establish a strong relationship with BLM through this forum.

As city mayors, we are members of the NPR-A Working Group and Mayor Hopson of the City of Wainwright acts as Co-Chair of the forum. Recently we have realized the frustrating reality once again, have challenged the BLM and outside organizations began participating in the NPR-A WG meetings claiming it falls under the Federal Advisory Committee Act (FACA), which was not the original purpose or structure of the NPR-A WG. We need this closed forum to exist to allow our voices to be heard and considered and to speak openly and directly to the BLM not to be drowned out by the outside influences and eNGO's who feel like they know better how to manage the lands and waters we depend on than we do as the original indigenous peoples of the region.

Through our multiple entities and facilities, we actively participate in the NEPA process, sometimes at significant expense through time, resources, travel, and consultants. It is not easy for us to participate in evening public meetings—for free—after working a full day, yet participate we do, confident in the knowledge that we are the experts of our lands and resources. The reason that we are expending so much effort to describe our participation in consultation, public hearings, and meetings with the BLM is that they listen to our concerns and work through alternatives, stipulations, and mitigation measures that are meaningful—so when a Record of Decision is issued, we feel that it is our Record of Decision. To undermine this with no engagement is to undermine us as a region and us as the indigenous Alaska Native Inupiat. These IAP-EIS's are important to our region and borough for long-term economic sustainability. We need these projects.

Our level of participation was the same throughout the Willow Master Development Plan (Willow) as it was for the Greater Moose's Tooth GMT1 and GMT2 Developments. Willow is a very important new project in the region that can sustain our communities for years into the future and continues to evolve our regional self-determination through the NSB. Our region, unlike many in the State of Alaska, is not run from government transfer funds either from the State or the federal government; we rely on the NSB to provide services. As mentioned before, it takes approximately \$400 MM per year to continue to support infrastructure within the

eight communities of the North Slope. We have entered the first world and want to stay there—yet at this time there are no alternatives for us other than continued development of our oil resources.

Throughout the course of the NEPA process, BLM conducted frequent outreach to our communities. Because the NSB has statutory authority for planning, zoning, and permitting within its jurisdiction, the NSB Planning Department and Wildlife Management Departments; each separately reviewed the Willow project for compliance with its municipal code and incorporated additional mitigations on the Willow to address local concerns with respect to impacts to subsistence. During the Scoping Process for Willow the Master Development Plan received comments from the North Slope constituents requesting significant changes to the project. In addition, the project proponent, ConocoPhillips, held over 100 meetings with local NPR-A communities to listen directly to our concerns. As a result, BLM and the NSB worked with the applicant, to incorporate changes into a Supplemental Willow Master Development Plan EIS and Record of Decision. This implies that the system is working. It proves to our people that they do have a voice to make changes to the major project. It also proves that the BLM is active through consultation. And lastly, it proves that the project proponent values our input and listened to our concerns. Isn't this the way its supposed to work Madame Secretary? The outcome and revised Willow project may not be what some of the new DOI appointments would have liked however it followed a process that our local stakeholders participated in and support.

According to the BLM, Willow can provide the NSB ~\$1.2 bn in property tax revenue over the 30-year life of the project. On top of that, approximately \$2.3 bn will be made available through the NPR-A Impact Grant Fund Program which administers grants from the State portion of the federal royalties to offset develop impacts or improve communities impacted by development. These grant funds are critical to the small city governments that we represent by providing for local self-determination and critical additional infrastructure to improve the quality of life in our communities. It has taken over 40 years for industry development on federal land in NPR-A to begin (i.e., GMT1, GMT2 and now Willow) and just when the projections show a significant increase in grant revenue, for new infrastructure, maintaining operations, and supporting our residents, the future is now at risk due to policies of this administration. Projects like Willow are important in that they meet the requirements of EO 13985 which speaks to addressing racial inequality and providing jobs to underserved communities.

We are aware that several ENGO's have filed lawsuits against the project asking for environmental justice however where is the indigenous justice should we advocate for a project that can significantly benefit us? We agree that climate is changing because we are at the forefront of those changes in the Arctic. We also know that non-renewable resources are not the future, however we require time to find alternatives to sustain our economy. Two of our organizations in our region, the North Slope Borough, and the Voice of the Arctic Inupiat (a non-profit comprised of tribes, municipal governments, ANCSA corporation, and educational institutions) have recently joined the Clean Hydrogen Coalition to look at alternatives in 'blue energy' on our way to green energy. Converting enormous volumes of natural gas stranded on the North Slope to hydrogen and sequestering the carbon may provide us with a steppingstone toward our next economy. We are not blind to change—one of the critical values of the Inupiat culture is adaptation to change—we could not have survived in the Arctic for over ten thousand years without adapting to its changes.

While your department, Madam Secretary, seems to be making decisions under the guise of EO 13990 and finding deficiencies in decisions made prior to its issuance we are finding in our review, several inconsistencies and an ambiguity embedded in the plethora of EO's and SO's and from our perspective they are not being used to help us but instead to further hinder local Inupiat self-determination. We are asking you, Madam Secretary, to respect our participation and to not throw all our hard work away and start anew. That would be an affront to those of us who were actively consulted with by the BLM through the entire NEPA process on all projects within our region. You cannot have an EO requiring indigenous consultation and a second EO that completely ignores that consultation. This administration has called for transparency and yet we have not seen any transparency in and of the EO's or in your SO's. In fact, it seems to be the opposite, as Alaskan Native Inupiat, we should have been invited for consultation with your department on each SO that has been issued so far—yet we have not. That speaks for itself.

We are asking you and your agencies not to undercut us as a people and to honor the work that we have done on the 2020 NPR-A IAP-EIS and the Willow Master Development Project. We know these are not projects that the environmental organizations are supportive of, but this was our land before it was the federal

government, and you have people and inside your agency that have filed many lawsuits against decisions that have a significant effect on the well-being of the indigenous Iñupiat of the North Slope region.

Thank you for your time and attention to our concerns. We look forward to future meetings and engagement both with you, Madam Secretary, and your department to better introduce ourselves and to provide additional information on the North Slope of Alaska.

We hope that we can find times to meet face-to-face once COVID-19 restrictions are lifted. Again, congratulations on your confirmation as Secretary of the Department of the Interior.

Sincerely,

Mayor Fannie Suvlu,
City of Utqiagvik, Alaska

Mayor John Hopson, Jr.
City of Wainwright, Alaska

Mayor Doug Whiteman
City of Atkasuk, Alaska

**NATIVE VILLAGE OF BARROW
IÑUPIAT TRADITIONAL GOVERNMENT**

March 4, 2022

Ms. Stephanie Rice, Project Manager
Bureau of Land Management
Anchorage, AK

Re: Willow Project SEIS Scoping Comments

Dear Ms. Rice,

I hope the day finds you well. The Native Village of Barrow (NVB) submits these scoping comments on the Supplemental Environmental Impact Statement NEPA process for the Willow Development proposed by ConocoPhillips Alaska in the National Petroleum Reserve-Alaska (NPR-A). NVB is a federally recognized tribe, located in Utqiagvik, Alaska and our tribal members live within the boundaries of the NPR-A.

We understand that BLM is preparing a Supplemental Environmental Impact Statement for the Willow Development to address deficiencies identified in the August 21, 2021 U.S. District Court of Alaska decision. The Native Village of Barrow urges BLM to focus only on the issues identified in the court decision and complete this supplemental NEPA process as quickly as possible, so that the project can begin construction during the next winter season. The project has already undergone over 140 days of public comment, over 12 public hearings, and an extensive review and an approval process by the North Slope Borough.

Our tribal members are also residents of the North Slope Borough (NSB) which provides key services for its communities such as education, public health, public utilities and infrastructure (clean water, solid waste, roads, etc.) and safety (fire, police, search and rescue). The costs of this infrastructure are high and the NSB's ability to provide for basic needs comes from its taxing authority over the oil industry on the North Slope. According to the BLM, Willow can provide the NSB with approximately \$1.2 bn in property tax revenue over the 30-year life of the project, which will be essential to providing for our tribal members and communities.

ConocoPhillips has engaged with North Slope residents for over 50 years and they are a responsible operator with a history of collaborating with our communities and working with us to protect our subsistence resources and lifestyle while contributing to our long-term local economic sustainability. They have made changes to the project and incorporated significant mitigations to protect the subsistence resources and lifestyle of our people which we support.

We urge BLM to listen to the people of the North Slope and complete a focused Supplemental EIS in a timely manner so that the project can move forward.

Sincerely,

MARY JANE LANG,
Executive Director

**LABOR ORGANIZATIONS
LETTERS OF SUPPORT FOR THE WILLOW PROJECT**

**LIUNA
(Laborers International Union of North America)**

July 27, 2022

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Ms. Stephanie Rice, Project Lead—Alaska State Office
Bureau of Land Management (BLM)
222 West Seventh Avenue—Mailstop 13
Anchorage, Alaska 99513

Re: Opposing Extension of 45-Day Comment Period for Willow SEIS

Dear Secretary Haaland and Project Lead Rice:

The Laborers' International Union of North America (LIUNA) is a diverse union representing nearly half a million members, most of whom work in the construction industry. LIUNA construction members work on a vast array of both privately and publicly funded infrastructure projects. Some examples include highways, roads, bridges, and tunnels; energy generation and distribution systems, natural gas pipelines, wind farms and solar panel fields, water and clean air works, environmental remediation, and buildings of all types. All of this, however, is put in jeopardy as our nation's critical infrastructure continues to be put under constant restraint brought on by costly, burdensome, and often unnecessary delays. I am writing to request that you do not extend the current 45-day comment period for the Supplemental Draft Environmental Impact Statement (SEIS) for Alaska's Willow project, and allow the process to continue to move forward.

Our members move from to job to job, project to project, gaining skills and experience that build construction careers and job prosperity. There is not an area of the construction sector that our members do not work in. This is especially true with respect to our nation's vast energy infrastructure sector. In fact, energy infrastructure, oil and natural gas in particular, is the largest privately funded job creating sector for LIUNA construction workers. The oil and natural gas industry has provided tens of thousands of jobs, resulting in millions of work hours for our members. These are quality union jobs, with family supporting wages and benefits. The same is true for the Willow project, and the jobs the project will generate.

Construction of the Willow project includes ice roads, pipelines and infield flowlines, gravel roads, pads and airstrips, and bridges. Given the nature of the work, construction can only be done during winter months. For that reason, the timing of Willow's construction is critical to its completion.

It is important to note that the current 45-day comment period is one of several comment periods that have transpired over the course of the proposed project. In reality, stakeholders have had multiple chances to submit comments, with a combined total of over 200 comment days and 25 public meetings. Therefore, the request to extend the current 45-day comment period by project opponents appears to merely be a tactical maneuver to exhaust more private capital by causing needless delays, as it would force the project to forgo the 2023 winter construction season, with the ultimate goal of upending the project altogether.

Permitting delays have become the norm within the construction industry. This only results in hindered job growth and forgone economic benefits. It is something that our members are all too familiar with, as we bear the brunt of these calculated assaults. For a LIUNA member, every day a project is delayed, is another day without a paycheck. It is another day without healthcare and pension contributions. The Willow project has had sufficient public engagement throughout its approval process and accordingly, the 45-day comment period for the Willow SEIS is adequate. We urge the Department to not extend the comment period time.

With kind regards, I am

Sincerely yours,

TERRY O'SULLIVAN,
General President

LIUNA
(Laborers International Union of North America)

August 26, 2022

Ms. Stephanie Rice, Project Lead (Alaska State Office)
Bureau of Land Management
222 West Seventh Avenue #13
Anchorage, Alaska 99513

Re: Willow Master Development Plan for the SEIS

Dear Ms. Rice:

On behalf of the 500,000 members of the Laborers' International Union of North America (LIUNA), I submit the following comments in response to the Supplemental Draft Environmental Impact Statement (SEIS) for the Willow Master Development Plan (MDP). LIUNA applauds the Bureau of Land Management for completing this SEIS, as it is an important and necessary step for Willow MDP to move closer to the project's construction phase and put LIUNA members to work. LIUNA supports the Willow MDP because of what it means for our nation's energy independence, local and state economies, and, most importantly, what it means for the hard-working LIUNA members in Alaska.

LIUNA members work throughout North America, predominantly within the construction industry. From highways and bridges, to tunnels and skyscrapers, our members work every day, building America. One sector, in particular, that has provided substantial workhours for our members is our nation's energy industry. Specifically, our oil and natural gas infrastructure. The oil and natural gas industry has employed thousands of laborers, which has led to tens of millions of construction workhours for LIUNA members.

Because construction jobs are inherently temporary by nature, LIUNA members must move from job to job, banding together project after project to create construction careers. As noted in the SEIS, Willow MDP can employ over 1,000 construction workers yearly for the roughly 7 years it will take to construct. This will result in millions of work hours for LIUNA members. These are good union jobs with family-supporting wages and benefits.

The work required for the construction of Willow MDP is work that our members are already trained to do. Infrastructure such as gravel and ice roadways, bridges, several hundred miles of pipelines, and the construction of airstrips and mine sites. Union apprenticeship training programs provide our workers with the best, high-skilled training within the construction industry. Combined with decades of experience, our workforce is second to none. This helps ensure that Willow MDP will be built correctly, on time, on budget, and with the least environmental impact. Developing Willow MDP is essential for our nation's national security and global competitiveness within the energy industry. Producing domestic energy supports American jobs while reducing the need to import from foreign countries.

ConocoPhillips completed its first Environmental Impact Statement (EIS) in 2020. Alternative B was the desired decision. There was, however, strong pushback due to environmental and habitat concerns. That concern led a federal judge to ultimately void the project's necessary permits in 2021, which triggered ConocoPhillips to conduct a second EIS. The 2022 SEIS added a new alternative, Alternative E, which addresses these issues. Alternative E downsizes the number of drill pads from five to three. In addition, it reduces the total area needed for surface infrastructure, thereby decreasing the amount of gravel, freshwater, and wetlands necessary for the project. Alternative E also relocates Bear Tooth drill site 5 (BT5), addressing potential environmental impacts with respect to wildlife.

On behalf of our members in Alaska and across North America, I thank the Bureau of Land Management for the opportunity to comment on this important project and for their hard work on this SEIS. LIUNA supports the Willow MDP and asks that BLM approve the Supplemental EIS and Record of Decision (ROD). Time is imperative, not only for the project itself, as its construction must be performed in the winter months, but also for LIUNA members who are waiting and, hoping, to go to work constructing Willow MDP.

With kind regards, I am

Fraternally yours,

TERRY O'SULLIVAN,
General President

NABTU
(North America's Building Trades Unions)

August 3, 2022

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Ms. Stephanie Rice, Project Lead
Alaska State Office
Bureau of Land Management (BLM)
222 West Seventh Avenue—Mailstop 13
Anchorage, Alaska 99513

Dear Secretary Haaland and Project Lead Rice:

On behalf of North America's Building Trades Unions (NABTU), its fourteen affiliated national and international unions, and the over 3 million construction industry employees we represent, I write to express our strong support for the Willow Project in Alaska and to state our opposition to any extension to the comment period for the recently released draft supplemental environmental impact statement (DSEIS).

After five public comment periods, 25 public meetings and hundreds of days for public comment, we request that the Bureau of Land Management (BLM) deny any request to further extend the comment period for the DSEIS. By approving such an extension all that would be gained is further delay in providing thousands of middleclass sustaining jobs to our members, and communities in Alaska. These requests for delay are not intended to yield substantially new information, as such has already been offered in the years since this project's announcement. They are instead intended to delay the project another winter construction period or worse delay the project to where it is no longer economically viable to proceed.

With the winter construction period rapidly approaching an extension of the comment period in any manner means our members, the working men and women of the construction industry, will be effectively blocked from receiving the good wages, benefits, and career experience offered by Willow for another calendar year.

Thank you for your consideration of this letter and your continued thoughtful approach to the Willow Project which will directly benefit our members in Alaska.

Sincerely,

SEAN MCGARVEY,
President

International Union of Operating Engineers
Affiliated with the American Federation of Labor and
Congress of Industrial Organizations

May 4, 2020

Bureau of Land Management Alaska State Office
c/o Racheal Jones, Project Manager
222 W 7th Avenue #13
Anchorage, AK 99513

Re: Support for Preferred Alternative B and Module Transfer Option 3,
Supplemental to the Draft Environmental Impact Statement for the Willow
Master Development Plan

The International Union of Operating Engineers respectfully submits the following comments in support of the Preferred Alternative B and Module Transfer Option 3 in the Supplemental to the Draft Environmental Impact Statement for the Willow Master Development Plan (MDP).

The International Union of Operating Engineers (IUOE) is one of North America's leading construction unions, representing over 400,000 hardworking men and women in the United States and Canada. Most members of the IUOE work in the construction sector, operating and maintaining heavy equipment. Thousands of IUOE members possess specialized training and years of practical experience building the nation's energy infrastructure that powers our country, including such notable projects as the Hoover Dam, the Trans-Alaska Pipeline, and countless power plants and pipelines.

The proposed \$5-\$6 billion Willow Project, a stand-alone development in the Bear Tooth Unit in the National Petroleum Reserve-Alaska (NPR-A), reliably and responsibly delivers American energy and job opportunities. The Project would provide significant employment opportunities to members of the Operating Engineers and other skilled trades and will bring critical revenue and jobs to Alaska and the nation, helping us recover from the devastating economic impacts of the COVID-19 pandemic. The Willow Project could create more than 2,000 construction jobs, plus 300 permanent jobs and generate more than \$10 billion in federal, state and North Slope Borough revenue. Overall, the project will exceed 7 million manhours, with construction expected to last over five years.

BLM's current public comment period should not be paused or extended because projects like Willow are critical to Alaska's economic recovery. The State of Alaska, Department of Natural Resources, provided a letter to BLM on April 3, 2020 which says: "This project will bring critical revenue and jobs to the State and the nation during an essential time." Alaska relies heavily on revenue from North Slope oil production, which has, generally speaking, seen a steady decline in production since its peak in 1988. The Project would help offset declines in production from North Slope oil fields—BLM estimates peak production of 130,000 barrels of oil per day and approximately yield 590 million barrels of oil over the Project's 30-year life.

Production from Willow would serve to help maintain the integrity of the Trans-Alaskan Pipeline System (TAPS), a critical link to America's energy distribution. Given the vast resources believed to be available in the NPR-A, future production could reverse the decline in TAPS, allowing it to remain viable for decades. Prohibiting development and production at Willow would set a dangerous precedent for future development in NPR-A, severely compromising the long-term energy and economic security of Alaska and the nation.

In response to stakeholder concerns and public comments on the Willow Master Development Plan Draft IES (DEIS) released in August 2019, ConocoPhillips submitted an updated project proposal that includes significant changes. The new proposal includes a third module transfer option, construction of a freshwater reservoir, and up to three boat ramps for subsistence use. The Module Option 3 would allow for delivery of the heavier module first to Oliktok Dock, then using existing gravel roads and land-based ice roads for transporting modules to the site of the Willow Central Facility. This makes a temporary gravel island no longer necessary.

The Willow MDP is consistent with the BLM's issued Integrated Activity Plan (IAP) for the NPR-A and complies with all of its obligations under the National Environmental Policy Act. The proposed Project minimizes environmental impacts and maintains high standards for safety and emergency response.

ConocoPhillips employs rigorous standards to protect the environment and subsistence resources. They have an excellent track record and long history of operating responsibly and working with stakeholders on the North Slope and in the Arctic. Alternative B reflects feedback that ConocoPhillips received from North Slope stakeholders and demonstrates its willingness to work with communities to minimize the impact of the project. Alternative B would also reduce environmental impacts compared to other alternatives by using less gravel fill, fresh water, and aircraft flights, while improving year-round access for local residents.

Extensive mitigation and engineering design features are incorporated into the Willow project. For instance, pipelines will be elevated to at least 7 feet and separated from roads to allow for caribou movements. Extended reach drilling technology has decreased the size of drill site pads by 15–20 percent, dramatically reducing the footprint in the North Slope. Spacing considerations in road and pipeline construction facilitates caribou movement minimizing disturbance to vulnerable wildlife. The DEIS references over 270 mitigation efforts and concludes, in section 3.19, that the cumulative effects of the project will not have a significant impact on the natural and human environment.

Since the construction of the Alpine facility in the North Slope, subsistence harvests of all key resources in Nuiqsut have remained strong. Caribou harvest have exceeded the average over the past few years since the construction of the CDS drill site, Greater Mooses Tooth 1 (GMT1), and Greater Mooses Tooth 2 (GMT2). Nuiqsut hunters are increasingly using roads to hunt year-round. Harvest numbers are increasing around infrastructure, which is a good indicator that caribou are not avoiding the infrastructure area.

The Willow Project will not have a significant impact on the environment, and it will maintain high standards for safety. This project will also put many Operating Engineers to work, along with others in the skilled trades. These jobs pay family-sustaining wages and offer strong health and pension benefits. Furthermore, construction of this project will provide much needed revenue to Alaska and the North Slope community.

The IUOE strongly encourages the Bureau of Land Management to approve the Preferred Alternative B and Module Transfer Option 3, Supplemental to the Draft Environmental Impact Statement for the Willow Master Development Plan.

Thank you for your consideration.

Sincerely,

JAMES T. CALLAHAN,
General President

ALASKA AFL-CIO

March 8, 2021

Hon. Deb Haaland, Secretary
Department of the Interior
1849 C Street, NW
Washington, DC 20240

The Honorable Secretary Haaland:

First, congratulations on your historic nomination and thank you for your willingness to serve and to grapple with this challenging policy area that affects every American.

We know that the challenge of balancing the future and the past is especially present in your department. There is no doubt that we must confront our changing environment, but we also must be mindful to transition in a way that is fair to workers, stakeholders and to the environment. It is with the thoughts of an intentional transition that we urge the Department of Interior to allow the Willow Project in the National Petroleum Reserve-Alaska (NPR-A) to proceed with the currently issued Environmental Impact Statement (EIS) Record of Decision (ROD). We are dismayed about reports that the Department intends to review current Environmental Impact Statements and RODs with the potential to review the EIS ROD for the Willow Project, causing harmful delay for a project that has incorporated the best mitigation practices available.

The Willow Project was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan (IAP) under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over 2 years. There were multiple rounds of public comment and public meetings; numerous meetings between the agencies and ConocoPhillips; over 100 public meetings involving Alaska Native stakeholders; and multiple significant revisions to the project to respond to suggestions and concerns from the Alaska Native community. The project is subject to over 270 mitigation measures and best practices from the 2013 Integrated Activity Plan. In addition, the Willow Project involves many proactive mitigations by ConocoPhillips. Specifically, the Willow Project has focused on lowering emissions and powering drilling rigs electrically once facilities are installed as well as increasing energy efficiency over traditional installations on the North Slope. During the North Slope Borough Rezoning Process, there were additional mitigations incorporated in the project. These include using foam insulation in roads to reduce road height and gravel quantities. The airport footprint was reduced along with adding restrictions for traffic and airport plans. There is also an extended and expanded oil spill mitigation agreement. In addition to the in-depth mitigation measures of the Willow project, hallmarks of the project planning have been community involvement, stewardship, and respect for subsistence and caribou.

This project has met all regulatory requirements in addition to working with local residents to further reduce impacts, and many are relying on the benefits it brings. The Department should not create last minute unnecessary delays and obstacles, but should allow the Willow Project to move forward as permitted and planned.

The economic benefits will be immense, and Alaska has never needed these gains more than now. Alaska's economy was first hit with a crash in oil prices followed by the ravages of the pandemic. By any measure, Alaska workers and their families are hurting. Our state budget is reaching an unprecedented crisis, and unemployment levels reflect the ongoing impacts of the pandemic on our jobs and local businesses. These challenging conditions are hitting Alaskans while they are already on economically precarious footing, and the Willow Project has the opportunity to both jumpstart our economy with jobs and be a model in community and environmental stewardship. To highlight a few of the many economic benefits of the Willow Project, the project would generate over 2,000 construction jobs and hundreds of long-term jobs. Consistent with the Administration's goals to increase middle-class union jobs, 75% of anticipated total North Slope installation work hours would be union labor. Again, the Willow Project gives us the opportunity for the Administration to work with unions to help set records with labor-management apprenticeship hours, workplace safety, and stewardship. In addition to an influx of much-needed jobs, according to BLM estimates, the Willow Project will generate \$2.3 billion in revenue

for the State of Alaska; \$7.6 billion in federal royalties, income taxes and gravel sales; and \$1.2 billion in revenues for the North Slope Borough.

The need for fossil fuels will be with us for quite some time to come. Alaska has proven itself to be a safe place to produce, has a track record of middle-class wages that support a family, and this responsible development has provided funding to our state government and the services needed by our citizens. Willow is a project that can help us bridge the gap and together we can build a just transition for our planet and our workforce. I urge you to support the current Record of Decision and allow the Willow project to move forward as planned and previously approved.

Sincerely,

JOELLE HALL,
Executive President

ALASKA PETROLEUM JOINT CRAFTS COUNCIL

February 6, 2021

Hon. Deb Haaland, Secretary Nominee
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Nominee Haaland:

As labor organizations representing workers in the oil and gas industry in Alaska, representing 19,800 workers, we urge the Department of Interior to allow the Willow Project in the National Petroleum Reserve-Alaska (NPR-A) to proceed with the currently issued Environmental Impact Statement (EIS) Record of Decision (ROD). We are disappointed about reports that the Department intends to review current Environmental Impact Statements and RODs with the potential to review the EIS ROD for the Willow Project, causing harmful delay for a project that has incorporated the best mitigation practices available.

The Alaska Petroleum Joint Crafts Council (APJCC) represents the Alaska workers who maintain critical energy infrastructure of national importance from the North Slope to the Valdez Marine Terminal. Through our exceptional training programs and adapting with improving technology, we have achieved exceptional safety and environmental records while skillfully executing significant projects under challenging conditions. We appreciate President Biden's plan to "Build Back Better" and incorporate clean energy into our country's energy plan. At the same time, the transition must include family-supporting jobs and maintain environmentally responsible projects like the Willow project to ensure the economic health of Alaska and our communities.

The Willow Project was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan (IAP) under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over 2 years. There were multiple rounds of public comment and public meetings; numerous meetings between the agencies and ConocoPhillips; over 100 public meetings involving Alaska Native stakeholders; and multiple significant revisions to the project to respond to suggestions and concerns from the Alaska Native community. The project is subject to over 270 mitigation measures and best practices from the 2013 Integrated Activity Plan. In addition, the Willow Project involves many proactive mitigations by ConocoPhillips. Specifically, the Willow Project has focused on lowering emissions and powering drilling rigs electrically once facilities are installed as well as increasing energy efficiency over traditional installations on the North Slope. During the North Slope Borough Rezoning Process, there were additional mitigations incorporated in the project. These include using foam insulation in roads to reduce road height and gravel quantities. The airport footprint was reduced along with adding restrictions for traffic and airport plans. There is also an extended and expanded oil spill mitigation agreement. In addition to the in-depth mitigation measures of the Willow project, hallmarks of the project planning have been community involvement, stewardship, and respect for subsistence and caribou.

This project has met all regulatory requirements in addition to working with local residents to further reduce impacts, and many are relying on the benefits it brings. The Department should not create last minute unnecessary delays and obstacles, but should allow the Willow Project to move forward as permitted and planned. The economic benefits will be immense, and Alaska has never needed these gains more than now. Alaska's economy was first hit with a crash in oil prices followed by the ravages of the pandemic. By any measure, Alaska workers and their families are hurting. Our state budget is reaching an unprecedented crisis, and unemployment levels reflect the ongoing impacts of the pandemic on our jobs and local businesses. These challenging conditions are hitting Alaskans while they are already on economically precarious footing, and the Willow Project has the opportunity to both jumpstart our economy with jobs and be a model in community and environmental stewardship. To highlight a few of the many economic benefits of the Willow Project, the project would generate over 2,000 construction jobs and hundreds of long-term jobs. Consistent with the Administration's goals to increase middle-class union jobs, 75% of anticipated total North Slope installation work hours would be union labor.

Again, the Willow Project gives us the opportunity for the Administration to work with unions to help set records with labor-management apprenticeship hours, workplace safety, and stewardship. In addition to an influx of much-needed jobs, according to BLM estimates, the Willow Project will generate \$2.3 billion in revenue for the State of Alaska; \$7.6 billion in federal royalties, income taxes and gravel sales; and \$1.2 billion in revenues for the North Slope Borough.

By implementing the best mitigation measures and incorporating deep engagement with stakeholders, the Willow Project can be a model to show what we accomplish when we bring together workers, responsible industry partners, environmental partners, and local communities. For the future of Alaska's jobs and our economy, I urge you to support the current Record of Decision and allow the Willow project to move forward as planned and previously approved.

Sincerely,

A.J. "JOEY" MERRICK II,
President

**United Association of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of the United States and Canada**

August 3, 2022

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Haaland:

On behalf of the more than 359,000 hardworking members of the United Association of Union Plumbers and Pipefitters (UA), I write in strong support of the Willow Master Development Plan (Willow Project) and urge you to swiftly complete the thorough public comment process. The Willow Project has undergone extensive reviews and stands ready to build.

It is long past time we create good-paying union jobs and invest in the North Slope communities that will benefit directly from this project in the National Petroleum Reserve-Alaska.

As you know, the review process for the Willow Project has now spanned three presidencies. This exhaustive review process has included public comment periods, environmental reviews conducted by the federal government, State of Alaska, and communities on the North Slope, and a 30-day scoping period. We are confident in the merits of the Willow Project, especially after such an exhaustive review, and believe that time is of the essence. Swift completion of this process will put our members to work—the best trained and most highly skilled craftspeople in the industry—building the critical infrastructure necessary to meeting our ambitious energy goals. Simply put, the Willow Project will help deliver reliable energy to consumers and provide billions of dollars in economic investment in these communities.

Thank you once again for your commitment to a rigorous and timely review process for not only the Willow Project, but all projects under your purview. We look forward to continuing our work with you, with the Department of the Interior, with the Biden Administration, and with our industry partners to create family-sustaining jobs, deliver reliable and affordable energy, and reach our shared climate goals.

Please do not hesitate to reach out to me or my staff with any questions on this project. The entire United Association stands ready to get to work as soon as this review process is complete.

Sincerely yours,

MARK MCMANUS,
General President

THE ALLIANCE
The Alaska Support Industry Alliance
Linking Alaska's Resources to Alaska's People

July 19, 2022

Stephanie Rice
Willow SEIS Comments
222 W. 7th Avenue Stop #13
Anchorage, Alaska 99513

Dear Ms. Rice,

On behalf of 500 Alliance members and their 35,000 Alaskan employees, I am writing to ask that the BLM stick to the 45-day comment period for the Willow SEIS.

This is not the Alliance's complete comment on the new SEIS, however, given the importance of timing to get hundreds of Alliance members to work on this project this year, we are submitting this comment to encourage the BLM not to extend the comment period and let people get back to work.

This project has undergone rigorous review for more than 5 years and has provided multiple opportunities over an extensive period of time for public comments and participation. The stakeholder engagement on this project has been extensive, involving the communities who are most directly impacted by the project to express their thoughts, concerns, and ideas about the project.

Please keep the comment period to 45 days and allow this critical economic engine to move forward.

Thank you for your consideration—

REBECCA LOGAN,
CEO

**ALASKA DISTRICT COUNCIL OF LABORERS
Laborers' International Union of North America**

March 1, 2022

Stephanie Rice
BLM Project Manager
222 W. 7th Avenue, Stop #13
Anchorage, AK 99513

Re: Support for Willow Project & Efficient Completion of 2022 SEIS

Dear Ms. Rice,

The Alaska District Council of Laborers offers its strong support for the Willow Project and encourages the BLM to complete the 2022 Supplemental Environmental Impact Statement (SEIS) in a timely manner to enable construction to move forward during the 2022–2023 winter season. Given the extensive incorporation of prior public comment and scientific studies, the 2022 SEIS should only address the limited issues identified by the Alaska District Court. The Alaska District Council of Laborers represents 5,500 Alaskans working in construction, the oil and gas industry, the public sector, tourism, and health care. Laborers work in the oil and gas industry from the North Slope to the Valdez Marine Terminal.

The Willow Project has gone through a rigorous environmental review process, incorporating extensive public comment and collaboration with multiple local, state, and federal agencies. The SEIS should only address the discrete issues identified by the Alaska District Court since other aspects of BLM's previous Willow Master Development Plan EIS were upheld and therefore do not require additional analysis.

The Laborers urge BLM to complete the discrete 2022 SEIS and Record of Decision in a timely manner to avoid additional delays in the many public benefits of the Willow Project. Increasing domestic energy production reinvigorates the economy and our local communities. Not only will the Willow Project generate Alaska jobs, it will substantially increase revenue for state and local governments. BLM estimates show that the Willow Project is expected to generate \$2.1 billion in state revenue from production, property, and income taxes as well as \$1.2 billion in property tax revenue for the North Slope Borough. In addition, the project could increase the Trans-Alaska Pipeline System throughput by around 20%, thereby enhancing the viability of this critical infrastructure.

Based on the significant economic benefits of the Willow Project and the narrowly tailored directive of the Alaska District Court, we urge BLM to move forward with an appropriately limited-scope 2022 SEIS. Thank you for the opportunity to comment.

Sincerely,

A.J. "JOEY" MERRICK II,
Business Manager, Secretary-Treasurer

SOUTHEAST STEVEDORING CORPORATION

April 12, 2021

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Haaland:

Southeast Stevedoring Corporation has been involved in responsible resource development in Alaska for over 69 years and we are writing to express our serious concerns that the Department of Interior intends to review the currently issued Environmental Impact Statement (EIS) and approved Record of Decision (ROD) for the Willow Project in the National Petroleum Reserve-Alaska (NPR-A). This would cause a very costly delay in this project.

In 2013, the Bureau of Land Management (BLM), under the Obama administration, issued a Record of Decision for an updated Integrated Activity Plan (IAP) for the NPR-A and the Willow development plan is consistent with that approved IAP.

The EIS process that led up to the Willow ROD took over two years, thousands of pages of scientific study and many thousand hours of public time and comments were invested into this decision. Based on this thorough public review, and in-depth environmental study, there is no rationale for another review of the ROD analysis for the Willow Project. The BLM efforts over the last 2+ years address the issues raised though the public comment process, and the hundreds of stipulations and best management practices the project will be required to follow.

Additionally, U.S. District Court has denied in full preliminary injunction motions filed by outside environmental advocacy organizations in two separate cases challenging the Record of Decision. The local people in the North Slope Borough provided a declaration with overwhelming support to allow the Willow Project to proceed. The people of Alaska need this project to continue.

Alaska's economy has been devastated by the COVID-19 pandemic and this project will provide over 2,000 construction jobs and hundreds of long-term jobs that are desperately needed. It will also bring in significant revenue to federal, state, and local governments which is critical in Alaska's efforts to recover from the pandemic. The BLM estimates the project will generate over \$1.2 billion in property tax to the North Slope Borough, \$2.3 billion in revenue to the State of Alaska and \$7.6 Billion to the Federal Government over the life of the project. We all need these resources and this revenue.

While there is a strong focus and desire to move toward greener energy sources that process will take time and the State of Alaska and all of America still needs to develop our own natural resources to meet the needs of our Country. The demand for these natural resources will not decrease and for us to continually stop projects like this that can be responsibly developed in our Country where we have strict regulations is only exporting potential environmental concerns to other countries who are not going to protect the environment as well as we do. The Department of Interior should be a leading Agency to promote a fully approved project like this and not delay it for further so we can responsibly use our own natural resources.

We ask for your support for the current ROD and allow the Willow project to proceed as planned and approved.

Sincerely,

LES CRONK,
Vice President

GENERAL STEAMSHIP AGENCIES, INC.

April 12, 2021

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Haaland:

As an acknowledged industry leader in providing ship agency services in North America for over 100 years and working closely with the oil and gas industry, General Steamship Agencies, Inc. (GSA) urges the Department of Interior to allow the Willow Project in the National Petroleum Reserve-Alaska (NPR-A) to proceed with the currently issued Environmental Impact Statement (EIS) Record of Decision (ROD). We are disappointed about reports that the Department intends to review the current EIS and ROD. This review of the Willow Project will cause harmful delays for a project that has incorporated the best mitigation practices available.

GSA and her waterfront partners provide skilled jobs developing, transporting and exporting Alaska's oil and gas resources in an environmentally responsible way. With the waterfront's excellent safety and environmental record, we rely on such skillfully executed projects to ensure the maximum reasonable protection for personnel and the environment. The current political transition must include family-supporting jobs and maintain environmentally responsible projects like the Willow Project to ensure the economic health of Alaska and our nation.

The Willow Project was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan (IAP) under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over 2 years. There were multiple rounds of public comment and public meetings, numerous meetings between the agencies and ConocoPhillips; over 100 public meetings involving Alaska Native stakeholders; and multiple significant revisions to the project to respond to suggestions and concerns from the Alaska Native community.

The project is subject to over 270 mitigation measures and best practices from the 2013 Integrated Activity Plan. In addition, the Willow Project involves many proactive mitigations by ConocoPhillips. Specifically, the Willow Project has focused on lowering emissions and powering drilling rigs electrically once facilities are installed as well as increasing energy efficiency over traditional installations on the North Slope. During the North Slope Borough Rezoning Process, there were additional mitigations incorporated in the project. These include using foam insulation in roads to reduce road height and gravel quantities. The airport footprint was reduced along with adding restrictions for traffic and airport plans. There is also an extended and expanded oil spill mitigation agreement. In addition to the in-depth mitigation measures of the Willow Project, hallmarks of the project planning have been community involvement, stewardship, and respect for subsistence and caribou.

By implementing the best mitigation measures and incorporating deep engagement with stakeholders, the Willow Project can be a model to show what we can accomplish when we bring together workers, responsible industry partners, environmental partners, and local communities. For the future of Alaska's jobs and our economy, I urge you to support the current Record of Decision and allow the Willow Project to move forward as planned and previously approved.

Sincerely,

SCOTT M. JONES,
President

ALASKA PORT SERVICES, INC.

April 7, 2021

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Haaland:

As a Maritime Services company who has worked closely the oil and gas industry for over 50 years Alaska Port Services (APS) urges the Department of Interior to allow the Willow Project in the National Petroleum Reserve-Alaska (NPR-A) to proceed with the currently issued Environmental Impact Statement (EIS) Record of Decision (ROD). We are concerned about reports that the Department intends to review the current EIS and ROD. This review of the Willow Project will cause harmful delays for a project that has incorporated the best mitigation practices available.

APS and her waterfront partners provide skilled jobs developing, transporting, and exporting Alaska's oil and gas resources in an environmentally responsible way. With the waterfront's excellent safety and environmental record, we rely on such skillfully executed projects to ensure the maximum reasonable protection for personnel and the environment. The current political transition must include family-supporting jobs and maintain environmentally responsible endeavors like the Willow Project to ensure the economic health of Alaska and our nation.

The Willow Project was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan (IAP) under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over 2 years. There were multiple rounds of public comment and public meetings, numerous meetings between the agencies and ConocoPhillips; over 100 public meetings involving Alaska Native stakeholders; and multiple significant revisions to the project to respond to suggestions and concerns from the Alaska Native community.

The project is subject to over 270 mitigation measures and best practices from the 2013 Integrated Activity Plan. In addition, the Willow Project involves many proactive mitigations by ConocoPhillips. Specifically, the Willow Project has focused on lowering emissions and powering drilling rigs electrically once facilities are installed as well as increasing energy efficiency over traditional installations on the North Slope. During the North Slope Borough Rezoning Process, there were additional mitigations incorporated in the project. These include using foam insulation in roads to reduce road height and gravel quantities. The airport footprint was reduced along with adding restrictions for traffic and airport plans. There is also an extended and expanded oil spill mitigation agreement. In addition to the in-depth mitigation measures of the Willow project, hallmarks of the project planning have been community involvement, stewardship, and respect for subsistence and caribou.

By implementing the best mitigation measures and incorporating deep engagement with stakeholders, the Willow Project can be a model to show what we can accomplish when we bring together workers, responsible industry partners, environmental partners, and local communities. For the future of Alaska's jobs and our economy, I urge you to support the current Record of Decision and allow the Willow project to move forward as planned and previously approved.

Very Respectfully,

ANDREW J. MEW

ALASKA MARITIME AGENCIES

April 7, 2021

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Haaland:

Founded in 1956, Alaska Maritime Agencies provides ship husbandry services to both foreign and domestic tanker vessel activity here in Alaska, which is heavily supported by the throughput of the oil via the Trans-Alaska Pipeline System (TAPS) from the Alaskan North Slope (ANS) region. We believe the current Environmental Impact Statement (EIS) Record of Decision (ROD) for the Willow Project is more than sufficient, and any further review would cause more unnecessary and costly delays.

The tanker vessel activity resulting from the TAPS production not only helps support our company but provides jobs for a variety of vendors we utilize. These include marine pilots, tug services, line handlers, tank surveyors, terminal workers, provisioning, and crewing services just to name a few. The tanker vessel activity in Prince William Sound (PWS), and subsequent destination of Cook Inlet (CI), has an excellent safety and environmental record while providing the above occupations with a stable source of income.

We strongly believe the Willow Project is essential to maintain a healthy throughput of oil through our Trans-Alaska Pipeline System. The project stands to add up to 100,000 barrels of oil per day, the transport of which provides secure employment for companies like ours. Also, the \$2.3 billion to State of Alaska revenue from production, property, and income taxes, plus \$7.6 billion in federal royalty, income tax, and gravel sales should be a huge boost to both the state and federal coffers.

In addition to the strong revenue forecasts noted above, Conoco Phillips has taken a very responsible and comprehensive approach to involving a variety of stakeholders among the North Slope Villages when developing both their spill mitigation and property enhancement plans. These plans are crafted to respect and protect the local Indigenous quality and style of life.

Combining these best mitigation practices along with the strong economic benefits to both state and federal revenues, we highly suggest the Willow Project continues as previously planned an approved.

Very Respectfully,

LUKE HASENBANK,
President

WESTERN OCEAN SERVICES

April 7, 2021

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Haaland:

As a Maritime Services company who has worked closely the oil and gas industry for over 50 years Western Ocean Services (WOS) urges the Department of Interior to allow the Willow Project in the National Petroleum Reserve-Alaska (NPR-A) to proceed with the currently issued Environmental Impact Statement (EIS) Record of Decision (ROD). We are concerned about reports that the Department intends to review the current EIS and ROD. This review of the Willow Project will cause harmful delays for a project that has incorporated the best mitigation practices available.

WOS and her waterfront partners provide skilled jobs developing, transporting, and exporting Alaska's oil and gas resources in an environmentally responsible way. With the waterfront's excellent safety and environmental record, we rely on such skillfully executed projects to ensure the maximum reasonable protection for personnel and the environment. The current political transition must include family-supporting jobs and maintain environmentally responsible endeavors like the Willow Project to ensure the economic health of Alaska and our nation.

The Willow Project was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan (IAP) under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over 2 years. There were multiple rounds of public comment and public meetings, numerous meetings between the agencies and ConocoPhillips; over 100 public meetings involving Alaska Native stakeholders; and multiple significant revisions to the project to respond to suggestions and concerns from the Alaska Native community.

The project is subject to over 270 mitigation measures and best practices from the 2013 Integrated Activity Plan. In addition, the Willow Project involves many proactive mitigations by ConocoPhillips. Specifically, the Willow Project has focused on lowering emissions and powering drilling rigs electrically once facilities are installed as well as increasing energy efficiency over traditional installations on the North Slope. During the North Slope Borough Rezoning Process, there were additional mitigations incorporated in the project. These include using foam insulation in roads to reduce road height and gravel quantities. The airport footprint was reduced along with adding restrictions for traffic and airport plans. There is also an extended and expanded oil spill mitigation agreement. In addition to the in-depth mitigation measures of the Willow project, hallmarks of the project planning have been community involvement, stewardship, and respect for subsistence and caribou.

By implementing the best mitigation measures and incorporating deep engagement with stakeholders, the Willow Project can be a model to show what we can accomplish when we bring together workers, responsible industry partners, environmental partners, and local communities. For the future of Alaska's jobs and our economy, I urge you to support the current Record of Decision and allow the Willow project to move forward as planned and previously approved.

Very Respectfully,

ANDREW J. MEW

PORT ACCOUNTING AND LOGISTIC SERVICES

April 7, 2021

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Haaland:

As a Maritime Services company who has worked closely the oil and gas industry for over 50 years Port Accounting and Logistic Services (PALS) urges the Department of Interior to allow the Willow Project in the National Petroleum Reserve-Alaska (NPR-A) to proceed with the currently issued Environmental Impact Statement (EIS) Record of Decision (ROD). We are concerned about reports that the Department intends to review the current EIS and ROD. This review of the Willow Project will cause harmful delays for a project that has incorporated the best mitigation practices available.

PALS and her waterfront partners provide skilled jobs related to developing, transporting, and exporting Alaska's oil and gas resources in an environmentally responsible way. With the waterfront's excellent safety and environmental record, all parties have skillfully executed projects to ensure the maximum reasonable protection for personnel and the environment. The current political transition must include family-supporting jobs and maintain environmentally responsible endeavors like the Willow Project to ensure the economic health of Alaska and our nation.

The Willow Project was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan (IAP) under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over 2 years. There were multiple rounds of public comment and public meetings, numerous meetings between the agencies and ConocoPhillips; over 100 public meetings involving Alaska Native stakeholders; and multiple significant revisions to the project to respond to suggestions and concerns from the Alaska Native community.

The project is subject to over 270 mitigation measures and best practices from the 2013 Integrated Activity Plan. In addition, the Willow Project involves many proactive mitigations by ConocoPhillips. Specifically, the Willow Project has focused on lowering emissions and powering drilling rigs electrically once facilities are installed as well as increasing energy efficiency over traditional installations on the North Slope. During the North Slope Borough Rezoning Process, there were additional mitigations incorporated in the project. These include using foam insulation in roads to reduce road height and gravel quantities. The airport footprint was reduced along with adding restrictions for traffic and airport plans. There is also an extended and expanded oil spill mitigation agreement. In addition to the in-depth mitigation measures of the Willow project, hallmarks of the project planning have been community involvement, stewardship, and respect for subsistence and caribou.

By implementing the best mitigation measures and incorporating deep engagement with stakeholders, the Willow Project can be a model to show what we can accomplish when we bring together workers, responsible industry partners, environmental partners, and local communities. For the future of Alaska's jobs and our economy, I urge you to support the current Record of Decision and allow the Willow project to move forward as planned and previously approved.

Very Respectfully,

ANDREW J. MEW

NORTH STAR EQUIPMENT SERVICES

March 29, 2021

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Urgent Support for Willow Project in Alaska's NPR-A

Dear Secretary Haaland:

As a construction company in the oil and gas industry for over 70 years North Star Equipment Services (NSES) urges the Department of Interior to allow the Willow Project in the National Petroleum Reserve-Alaska (NPR-A) to proceed with the currently issued Environmental Impact Statement (EIS) Record of Decision (ROD). We are disappointed about reports that the Department intends to review the current EIS and ROD. This review of the Willow Project will cause harmful delays for a project that has incorporated the best mitigation practices available.

NSES provides many good paying jobs developing Alaska's oil and gas resources in an environmentally responsible way. With our excellent safety and environmental record, we have skillfully executed projects to make sure our workers go home unaffected and the environment unharmed. The current political transition must include family-supporting jobs and maintain environmentally responsible projects like the Willow project to ensure the economic health of Alaska and our Country.

The Willow Project was planned based on the requirements of the 2013 NPR-A Integrated Activity Plan (IAP) under the Obama-Biden Administration and Secretary Salazar with the highest standards for environmental stewardship. The permitting and environmental review process encompassed a period of well over 2 years. There were multiple rounds of public comment and public meetings, numerous meetings between the agencies and ConocoPhillips; over 100 public meetings involving Alaska Native stakeholders; and multiple significant revisions to the project to respond to suggestions and concerns from the Alaska Native community.

The project is subject to over 270 mitigation measures and best practices from the 2013 Integrated Activity Plan. In addition, the Willow Project involves many proactive mitigations by ConocoPhillips. Specifically, the Willow Project has focused on lowering emissions and powering drilling rigs electrically once facilities are installed as well as increasing energy efficiency over traditional installations on the North Slope. During the North Slope Borough Rezoning Process, there were additional mitigations incorporated in the project. These include using foam insulation in roads to reduce road height and gravel quantities. The airport footprint was reduced along with adding restrictions for traffic and airport plans. There is also an extended and expanded oil spill mitigation agreement. In addition to the in-depth mitigation measures of the Willow project, hallmarks of the project planning have been community involvement, stewardship, and respect for subsistence and caribou.

By implementing the best mitigation measures and incorporating deep engagement with stakeholders, the Willow Project can be a model to show what we can accomplish when we bring together workers, responsible industry partners, environmental partners, and local communities. For the future of Alaska's jobs and our economy, I urge you to support the current Record of Decision and allow the Willow project to move forward as planned and previously approved.

Sincerely,

JEFF BENTZ,
President

**ALASKA DELEGATION
LETTERS OF SUPPORT FOR THE WILLOW PROJECT**

**UNITED STATES SENATE
Washington, DC 20510**

March 8, 2022

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Haaland:

We write to reiterate our strong support for the Willow Master Development Plan (Willow), and to urge the Department of the Interior to expeditiously complete a Supplemental Environmental Impact Statement (EIS) that leads to federal re-approval of this critical project.

The Bureau of Land Management's (BLM) review process for Willow has consisted of a rigorous multi-year environmental analysis with coordination across four federal agencies, the State of Alaska, affected communities on the North Slope, Alaska Native Tribes, and the general public. The prior Record of Decision and Final EIS also facilitated robust public participation, including more than a dozen in-person meetings and a total of nearly five months of public comment periods.

The results of the process were clear: Willow is an environmentally conscious project that abides by the strictest environmental considerations in the world and has widespread support across Alaska from Alaska Natives, building trades and organized labor, and the public.

Today, Willow is supported by the Alaska Federation of Natives, the Inupiat Community of the Arctic Slope, and the North Slope Borough (NSB), among many others. It has drawn such extensive support because its operator, ConocoPhillips, has an excellent record of responsible development in our state, and because it will be a key source of job creation, government revenues, and energy security—all of which are needed in these turbulent times.

Willow is estimated to support hundreds of new, permanent, and well-paying jobs, many of which will be union jobs—a remarkable number for any project in Alaska. Many of its jobs will be filled by those who live in the North Slope Borough, while others will help Alaskans who remain unemployed or underemployed in the wake of the pandemic. This is particularly important for an industry that lost an estimated 30 percent of its jobs between 2019 and 2021 due to the pandemic.

By BLM's own estimates, Willow is projected to generate \$2.1 billion for the State of Alaska and \$1.2 billion for the NSB at oil prices dramatically lower than what we face today. Higher prices will generate more revenues for governments at all levels. The NSB will use its share of those funds to support valuable community water and sewer infrastructure; educational services, including Alaska's only tribal college; and coastal and climate resiliency projects.

The war in Ukraine further underscores the urgency and need for Willow. Oil prices were already high, but have risen even further since the start of Russia's unprovoked atrocities. Countries around the world, especially our own, must shift away from any dependence on Russian energy. The Willow Project and its estimated 160,000 barrels of daily supply can play a major role in making sure that happens.

Willow also meets the stated goals for the administration's environmental justice initiatives. Approximately three-quarters of the Borough's nearly 10,000 permanent residents are Inupiat, with over 98 percent of Inupiat households living a subsistence lifestyle. Willow will be an example of responsible resource development that meets all local and federal laws while providing benefits to underserved and minority communities, while successfully balancing the needs of regional subsistence users through strong mitigation measures.

We firmly believe BLM should complete a Supplemental EIS and Record of Decision for Willow in time to allow for construction to begin during the 2022–2023 winter season. This is possible within the legal and administrative processes and would demonstrate seriousness about rising energy prices and the need for greater energy security. There is no better time and no better way to reassure our allies that the United States will help stabilize markets, prevent shortages, and lower prices.

Willow is a major project, located in our National Petroleum Reserve, which was specifically designated for energy development. The delays it has already faced are deeply unfortunate, and it now awaits approval at a key moment. In light of inflation, rising gas prices, and a dramatic shift in international geopolitics, we urge you to recognize the immense benefits this project will bring and to act promptly to approve it.

Sincerely,

Lisa Murkowski,
United States Senator

Dan Sullivan,
United States Senator

Don Young,
Congressman for All Alaska

CONGRESS OF THE UNITED STATES
House of Representatives

February 23, 2022

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Haaland:

I am writing in response to the letter you recently received from House Natural Resources Committee Chairman Raul Grijalva about the Willow project in my state, Alaska. I firmly oppose his request that you “suspend” or “freeze” the Willow permitting process. Willow should get fair consideration on its merits under the National Environmental Policy Act and other applicable law. I thank you for the Administration’s earlier support and defense of the Willow project Record of Decision in court.

Willow is not a typical oil and gas development or the product of any single federal administration. Willow has been designed under laws uniquely applicable to Alaska, including the Naval Petroleum Reserve Production Act of 1976, the Alaska National Interest Lands Act of 1980, and the local land use and zoning requirements of the North Slope Borough. At the heart of each of these processes is the goal of using public lands to best serve the broad public interest. There are very few projects that serve the public interest better than Willow.

The processes leading to approval of Willow began in 1999, during the Clinton Administration, when the first Willow-area oil and gas leases were sold by BLM. After years of careful exploration efforts, the area is finally ready for development and production under a plan that includes up to five drill sites connected to existing development on the eastern edge of the massive National Petroleum Reserve-Alaska (NPR-A). The project design complies with the NPR-A Integrated Activity Plan (IAP) developed by the Obama-Biden Administration in 2013. The 2013 IAP adopted the most environmentally protective alternative considered at the time and had the support of many of the environmental advocacy groups that are now opposing Willow. Although a new IAP was adopted in 2020, BLM has recently announced a plan to revert to the 2013 IAP. The IAPs primarily address future leasing decisions and reverting to the 2013 IAP would pose no obstacle to the Willow project.

Our great country has the most stringent environmental regulations for oil and gas development anywhere, and nowhere is that truer than in Alaska. Willow protects the land, wildlife and subsistence activities that are unique to the region. Contrary to suggestions otherwise, Willow complies with all applicable requirements of the Teshekpuk Lake Special Area and the Colville River Special Area. The project has design features such as elevated pipelines that are proven to provide for caribou passage. The project has mitigation measures such as parking areas and boat launches to ensure improved access for hunting, fishing, and other subsistence activities. The project is subject to conditions of approval imposed by the North Slope Borough local government, which applies strict zoning criteria to ensure development does not adversely impact subsistence. In January 2021, the Borough Assembly—which includes representatives from all NPR-A communities and their predominantly Inupiat residents—approved rezoning of lands specifically to allow Willow construction to proceed.

As directed by existing federal law, 50 percent of the federal royalties from Willow production will be available to fund a grant program administered by the State of Alaska for the benefit of affected communities. This program is already in effect, but the current funding is small compared to what communities are rightfully expecting when Willow comes online. Under BLM’s estimate, this program will make \$2.6 billion available over the 30-year life of the project to communities impacted by development. These grant funds will be available to NPR-A villages—historically, grants have been provided to Utqiagvik (Barrow), Atkasuk, Nuiqsut, Anaktuvuk Pass, and Wainwright—to serve public safety, public health, climate change resiliency, education, and other important public uses.

Willow is a balanced development plan that was refined during an extensive public process, complies with the law, and serves the broad public interest. Willow should not be a mythical climate change symbol as advocated by people far removed from Alaska who contend that moving Willow forward is incompatible with addressing climate change challenges. That contention is wrong. Outside groups

attempting to advance their agendas at the expense of the majority of North Slope Alaska Native stakeholders who support the Willow project is offensive to me and to them, as noted in the attached January 26, 2022, letter from the Inupiat Community of the Arctic Slope, the North Slope Borough, and the Arctic Slope Regional Corporation to Chairman Grijalva.

Production from Willow would constitute a tiny fraction of national and international greenhouse gas emissions. If Willow were to be blocked, those emissions would occur anyway or even be exceeded from production generated in places like Russia or elsewhere, who have worse environmental records and standards, and whose outputs would still be traded on the international market. The reality is that oil and gas production is necessary, now and in the future, even as a transition to lower-emission energy sources occurs over time. I am not aware of any source of oil and gas production that the U.S. government should prefer to Willow. The project makes use of existing infrastructure like the Trans-Alaska Pipeline system; provides public revenue streams to federal, state and local governments; will fund an existing mitigation program that makes grants available to local communities; protects subsistence resource and access for subsistence activities; and has broad support in Alaska and the North Slope region. Thus, the project fulfills core principles of environmental justice and should rise to the top of any list of realistic energy development projects worthy of approval.

I urge you to reject calls to stall approval of the Willow project. I further urge you to direct staff in the Department of the Interior and the BLM to complete a supplemental environmental impact statement and new Record of Decision in a timely fashion to address the narrow issues identified in the Federal District Court's ruling and bring the benefits of the Willow project to life. A reminder that Willow has extensive support from the North Slope Inupiat people:

- The Inupiat Community of the Arctic Slope
- The Voice of the Arctic Inupiat
- The North Slope Borough
- The ANCSA Regional Association
- Arctic Slope Regional Corporation
- The Alaska Native Village Corporation Association
- The Cities of Utqiagvik, Wainwright and Atkasuk

I would welcome the opportunity to discuss Willow with you at any time, and further to facilitate your meeting with the groups above to hear from them directly.

Sincerely,

DON YOUNG,
Congressman for All Alaska

UNITED STATES SENATE

July 15, 2022

Hon. Deb Haaland, Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Haaland:

We write to reiterate our strong support for the Willow Master Development Plan (Willow) in the National Petroleum Reserve-Alaska (NPR-A), and to urge the U.S. Department of the Interior to complete, without delay, a thorough public comment process for the July 2022 draft supplemental environmental impact statement (SEIS) for this critical project.

The SEIS published on July 15 is limited to one new project alternative, which includes fewer drill sites and reduced surface impacts. At the end of this 45-day comment period, the project will have undergone 215 days of public comment with 25 public meetings, on top of a 30-day scoping period this past February. This clearly represents a comprehensive and rigorous public comment process.

We therefore firmly believe that a 45-day comment period will allow all stakeholders and the general public more than enough time to review the SEIS and

provide meaningful comment. Timely completion of this process is critical to the project's ability to undertake any level of development activities during the rapidly-approaching 2022–2023 winter season—the shortest construction season in the world due to Alaska's world class environmental standards, which incorporate standards, including ice roads and pads, which virtually eliminate any surface disturbance. It would also demonstrate the urgency required to address the seriousness of rising energy costs, the need for greater energy security, and the Administration's stated goals for its environmental justice initiatives.

As we previously noted in our March 8, 2022 letter, the review process for Willow has already consisted of multi-year environmental analyses by the Bureau of Land Management (BLM) across multiple federal agencies, the State of Alaska, and affected communities on the North Slope. The results have shown that Willow abides by the strictest environmental considerations in the world and has widespread support across Alaska and committed support from the President of the United States. The Alaska District Council of Laborers, for example, has pointed out, “not only will the Willow Project generate Alaska jobs, it will substantially increase revenue for state and local governments.”¹

Alaska Natives are also especially supportive of this project, as it would contribute to their economic well-being and prosperity for years to come. For example, Julie Kitka, President of the Alaska Federation of Natives, wrote to you in a letter that Willow “could jumpstart our economy with thousands of jobs and be a model in community and environmental stewardship for years to come.”² Hallie Bissett and Kim Reitmeier, Executive Directors, respectively, of the Alaska Native Village Corporation Association and ANCSA Regional Association, have urged you not delay Willow “given the exhaustive and thorough review process it has already undergone, and the urgent need for vetted, economic opportunities for safe development in Alaska.”³ The cities of Utqiagvik, Wainwright, and Atkasuk, located on the North Slope, have even passed resolutions in support of oil and gas development projects, like Willow, within the NPR-A, and explicitly asked you “not to undercut us as a people and to honor the work” they have done with your agencies throughout the development of Willow.⁴

Again, given BLM's previous evaluations of Willow, a 45-day public comment period is a sufficient time frame for any interested party to wholly evaluate the SEIS. Willow has already faced multiple delays, and now again awaits approval at a pivotal moment. Given the current pace of inflation, high gas prices, and international geopolitics, we urge you to recognize the immense benefits this project will bring and act promptly to approve it.

Sincerely,

Lisa Murkowski,
United States Senator

Dan Sullivan,
United States Senator

¹ Letter from A.J. “Joey” Merrick II, Secretary-Treasurer, Alaska District Council of Laborers, to Stephanie Rice, Project Manager, Bureau of Land Management (Mar. 1, 2022).

² Letter from Julie Kitka, President, Alaska Federation of Natives, to the Honorable Debra Haaland, Secretary, U.S. Department of the Interior (Feb. 23, 2022).

³ Letter from Hallie Bissett, Executive Director, Alaska Native Village Corporation Association, and Kim Reitmeier, Executive Director, ANCSA Regional Association, to the Honorable Debra Haaland, Secretary, U.S. Department of the Interior (Feb. 4, 2021).

⁴ Letter from Fannie Svlu, Mayor, City of Utqiagvik, Alaska, John Hopson, Jr., Mayor, City of Wainwright, Alaska, and Doug Whiteman, Mayor, City of Atkasuk, Alaska, to the Honorable Debra Haaland, Secretary, U.S. Department of the Interior (Apr. 26, 2021).

**ALASKA STATE GOVERNMENT
LETTERS OF SUPPORT FOR THE WILLOW PROJECT**

**THE STATE OF ALASKA
Department of Natural Resources
OFFICE OF THE COMMISSIONER**

July 22, 2022

Tommy Beaudreau, Deputy Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Re: Willow Master Development Plan Public Comment Period

Dear Deputy Secretary Beaudreau:

I write to call your attention to the attached letter provided by the Department of Natural Resources' Office of Project Management and Permitting in their role as a cooperating agency on the development of the Willow Master Development Plan Supplemental Environmental Impact Statement (SEIS). For all the reasons described in the letter, it is critical that the Bureau of Land Management (BLM) proceed through the process for the SEIS without granting requests for delays and extensions based on fundamental misrepresentations about the project or the scope and thoroughness of the reviews conducted to date.

We make this request on behalf of discrete public interests. First, this project has been under review since 2016, with multiple public comment periods (many already extended), dozens of public meetings, and thousands and thousands of personnel hours devoted to the development, review, and public discussion of the information now distilled in the SEIS. The Alaskans that have participated in this process from the beginning deserve resolution. Second, the Alaskans that are poised to benefit from the project continue to suffer from delays. Workers on the verge of starting the project were paused over the Christmas holiday in 2020 and enjoined from doing so in early 2021, and continue to await resolution. The communities of the North Slope that would receive property taxes and National Petroleum Reserve-Alaska (NPR-A) impact mitigation grants continue to have promised returns from development pushed further into the future. Collectively, these communities continue to express support for the prompt finalization of the SEIS, and we actively join them in doing so. Third, it is increasingly apparent how important domestic energy production is to the American people. The international turmoil that has characterized this year to date repeatedly shows how critical control of energy supplies is to security at home and positive influence abroad.

We look forward to participating in the upcoming public meetings, submitting substantive comments on the Draft SEIS within the 45-day comment period, and actively continuing to work as a cooperating agency as the robust public process continues.

Sincerely,

AKIS GIALOPSOS,
Acting Commissioner

THE STATE OF ALASKA
Department of Natural Resources
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

July 22, 2022

Bureau of Land Management—Alaska State Office
222 West Seventh Avenue, Number 13
Anchorage, Alaska, 99513

Re: Willow Master Development Plan—draft Supplemental Environmental Impact Statement 45-day public comment period

Dear State Director Cohn and BLM Project/EIS lead Rice:

The State of Alaska, as a cooperating agency, is reviewing the Draft Supplemental Environmental Impact Statement (SEIS) for the Willow Master Development Plan (Willow), which is currently out for a 45-day public review. As we review the draft SEIS, we want to reiterate the importance of the Willow project and the timely completion of the federal environmental review process, which is of critical interest to the State, the Nation, and North Slope stakeholders. The State of Alaska strongly encourages BLM to confirm this 45-day public review period is appropriate and proceed through the process without any delay. Complete comments from the State of Alaska in response to the SEIS are forthcoming under separate cover.

We firmly believe that a 45-day comment period will allow all stakeholders ample time to review the updated information included in this SEIS. The Willow project has gone through numerous reviews and public notices focused on these same conceptual items. To date the Bureau of Land Management (BLM) has conducted two scoping periods (including one in March 2022, which was not required by federal law), produced three draft EIS's (two supplemental drafts), one final EIS, and one Record of Decision (ROD), which was the subject of judicial review. Throughout the environmental review process BLM has afforded the cooperating agencies and the public multiple opportunities to review and comment on the proposed activities and analysis of potential effects. Naturally, this process becomes more focused as it proceeds, and the material in the SEIS now under review is the culmination of years of process and nearly 200 days of public comment to date. It is also important to note that this will not be the last opportunity to for public submissions on this material—the Final SEIS will be reviewed by cooperating agencies before it is published, and the public will have yet another opportunity to submit views and input on the project before BLM publishes the ROD.

Additionally, during the development of this most recent draft SEIS, BLM has held numerous meetings and workshops for a variety of stakeholders to receive input, walk stakeholders through the analysis, and answer questions—to ensure that stakeholders would be well prepared to submit comments on the material in the SEIS. BLM will also conduct five public hearings over the next month to ensure that the stakeholders have multiple opportunities to learn about the draft SEIS analysis, ask questions, and submit comments. In addition to the multiple reviews, additional scoping period, and other stakeholder participation opportunities that have been provided for the SEIS—in addition to the years of process leading to the SEIS—it is important to note that there is limited new information to be considered and reviewed within this draft SEIS. Only one new alternative was identified, alternative E, which ultimately reduced the number of proposed pads, wells, and overall footprint of the project. With such a reduced footprint, information in this alternative has effectively already been seen and reviewed by North Slope stakeholders and the public.

Bringing projects like Willow online is one of the single most effective actions BLM can take to support North Slope communities and promote an autonomous and self-sustaining future that provides “environmental justice” benefits for local communities and reduces “environmental justice” impacts as assessed by BLM. In fact, not allowing the Willow project to efficiently move forward would be the biggest “environmental justice” impact of all. Delaying or stopping the first major production in NPR-A would deprive NPR-A communities of a long-promised partnership in the benefits of resource production. The Willow development is the answer to mitigating a host of “environmental justice” impacts to NPR-A communities, but without the production royalties from projects like Willow and future NPR-A developments this program will not be able to generate revenue and fund necessary

mitigation projects as promised by the federal government. Further delays on this project are not in the public interest and will continue to have significant negative impacts on to the State of Alaska, North Slope Borough, NPR-A communities, and other North Slope stakeholders.

For these reasons, the State of Alaska affirms our support of BLM's published 45-day review period for the SEIS and our commitment as a cooperating agency to assist in the review process. BLM has provided ample opportunities for review and input from all interested stakeholders, including the State of Alaska, and any extension to the comment period is not warranted.

Sincerely,

JEFF BRUNO,
Project Coordinator

ALASKA STATE LEGISLATURE

May 4, 2020

Willow DEIS Comments
 BLM Alaska State Office
 22 W 7th Ave. #13
 Anchorage, AK 99513

To whom it may concern:

We are writing in support of the Draft Environmental Impact Statement for ConocoPhillips' Willow oil and gas prospect. This project is absolutely critical for Alaska from both an economic and social perspective.

In recent decades, our oil and gas industry and support contractors have developed increasingly sophisticated and effective means of exploring for and producing oil and gas with minimal surface footprint. As a result, we are able to produce more oil with less impact on local wildlife such as caribou, eiders, and other species on the North Slope. Oil and gas exploration and production can now increase local income and job opportunities—with associated positive social impacts—without significant negative impacts to subsistence activities.

Alaska depends on the oil and gas industry, not just for jobs, but also for income. Our state depends on oil-related revenue to finance schools, public safety, transportation, and more. Along with earnings from the Permanent Fund, oil is the lifeblood of our state budget. For this reason, the Willow prospect is extremely important for the state's economic future.

In conclusion, we support the Willow prospect and look forward to the positive impact this important development will have on local communities and throughout Alaska.

Thank you for your consideration.

Sincerely,

Rep. Kelly Merrick
 District 14

Senator Shelley Hughes
 District F

Rep. Bart LeBon
 District 1

Senator Peter Micciche
 District O

Rep. Mike Prax
 District 3

Senator Josh Revak
 District M

Rep. Colleen Sullivan-Leonard
 District 7

Rep. George Rauscher
 District 9

Rep. Cathy Tilton
 District 12

Rep. Sara Rasmussen
 District 22

Rep. Chuck Kopp
 District 24

Rep. Mel Gillis
 District 25

Rep. Lance Pruitt
 District 27

ALASKA STATE LEGISLATURE

August 12, 2022

Steve Cohn, Director
 U.S. Bureau of Land Management-Alaska
 222 W. 7th Avenue, Stop #13
 Anchorage, AK 99513

Re: Support for the Willow Project, the Draft SEIS, and Responsible Oil and Gas Development

Dear Director Cohn:

We write today in support of the Willow Project, the draft supplemental environmental impact statement (SEIS), as well as the responsible development of Alaska's oil and gas resources.

Alaska's oil and gas production is held to the highest environmental standards, with extensive protections for local communities and workforces. A barrel of oil produced in Alaska and shipped through the Trans-Alaska Pipeline System (TAPS) is among the most environmentally and socially responsible in the world.

With that said, the Willow Project is anticipated to generate between \$1.3 billion and \$5.2 billion in unrestricted general fund (UGF) revenue for Alaska, 2,000 construction jobs, and 300 permanent positions. These benefits, along with shared federal royalties and property taxes for North Slope communities, make the development of this project a priority for Alaskan lawmakers.

It is worth noting that revenue from oil and gas production currently comprises 46 percent of Alaska's UGF revenue. Thus, healthy throughput in TAPS equates to healthy state services and a higher quality of life for our residents.

The Willow Project will also promote national energy independence by increasing our supply of competitive, domestic oil. The project is anticipated to produce up to 180,000 barrels per day and will keep a key piece of U.S. infrastructure, TAPS, economically viable with a 20 percent increase in throughput.

The Willow NEPA environmental impact statement (EIS) process began in 2018. It has included 5 public comment periods spanning 215 days and 25 public meetings, and the new draft SEIS has been extensively modified with additional surface protections.

We respectfully request that you consider SEIS Alternative E as a path forward for the project, and support the utilization of this available, abundant, and responsibly developed resource for the benefit of Alaskans and the Nation.

Sincerely,

Rep. Louise Stutes
 Speaker, Alaska House of
 Representatives

Rep. Chris Tuck
 House Majority Leader

Rep. Kelly Merrick
 Co-Chair, House Finance Committee

Rep. Matt Claman
 House Majority Whip

Rep. Dan Ortiz
 Vice-Chair, House Finance
 Committee

Rep. Sara Rasmussen

Rep. Grier Hopkins

Rep. Steve Thompson

Rep. Andy Josephson

Rep. Bart LeBon

Rep. Calvin Schrage

Rep. Mike Prax

ALASKA STATE SENATE
32nd Legislature

August 26, 2022

Steve Cohn, Director
Alaska State Office
Bureau of Land Management
222 W. 7th Avenue, Stop #13
Anchorage, AK 99513

Re: Support for the Willow Project, Alternative E & Timely Completion of SEIS

Dear Director Cohn:

We urge the Bureau of Land Management (BLM) to adopt the Draft Supplemental Environmental Impact Statement (SEIS) for the Willow Project to allow construction to move forward during the 2022–23 winter season to prevent any additional delays. The Draft SEIS included a new project alternative, Alternative E, which represents a good path forward for this project so critical to Alaska.

The Willow Project has undergone an extensive environmental review process that has lasted nearly five years. The Alaska District Court required just three narrow issues in the previous final EIS to be updated, which are addressed in this draft SEIS. Alternative E includes fewer drill sites and reduced surface impacts and does not require a prolonged review period. The 45-day comment period is more than sufficient for public engagement on the Draft SEIS. In addition to adopting a Final SEIS in a timely fashion, the BLM should refrain from extending the 45-day comment period for the Draft SEIS.

Alaskans across the state stand to benefit from the Willow project. The construction and installation phase of the project will require an estimated nine million manhours of labor, equating to 2,000 construction jobs. Willow operations will create 300 permanent jobs. Most of the construction and operations work will be done by Alaskans. As the U.S. appears to be entering a recession, Willow presents a unique opportunity to support Alaska's economy and workforce.

In addition to the job opportunities the project will generate for Alaskans, there will be significant fiscal benefits. Based on the BLM Draft SEIS analysis of two oil price scenarios, Willow could produce between \$1.3 and \$5.2 billion in State of Alaska revenue from production, property and income taxes over the life of the project. This equates to additional State revenue that averages between \$40 and \$170 million each year, depending on price. Members of the Senate have long advocated that Alaska can achieve fiscal stability through safely and responsibly producing the natural resources on our public lands. The Willow project will also provide benefits to all Alaskans by supporting public services like programs to help the disadvantaged succeed, good schools and safe communities.

Alaskans are not the only beneficiaries of the Willow Project going forward. Our nation's energy security is reaching a new low and warrants strong consideration. The production of oil and gas in Alaska is second to none when it comes to compliance with stringent safety and environmental regulations. We support laws and regulations governing production and transportation of all petroleum products and hold high expectations for those operating within our great state. Alaskans take great pride in the fact that our pristine state is being protected for generations to come.

Given the substantial economic benefits to local communities, the State of Alaska, and the nation, as well as the narrow directive from the federal district court, we ask that BLM adopt the Willow Draft SEIS, Alternative E, in a timely manner. We feel there has been sufficient public engagement to move forward without further delay based on the five public comment periods, the series of public meetings, and the extensive scientific and agency reviews.

Thank you for the opportunity to comment on this critical project for Alaska's future.

Sincerely,

Peter A. Micciche
Senate District O, Senate President

Lyman Hoffman
Senate District S

Tom Begich
Senate District J, Minority Leader

Roger Holland
Senate District N

Click Bishop
Senate District C

Shelley Hughes
Senate District F, Majority Leader

Mia Costello
Senate District K

Scott Kawasaki
Senate District A

Elvi Gray-Jackson
Senate District I

Robert Myers
Senate District B

Lora Reinbold
Senate District G

Gary Stevens
Senate District P

Josh Revak
Senate District M

Natasha von Imhof
Senate District L

Mike Shower
Senate District E

Bill Wielechowski
Senate District H

Bert Stedman
Senate District R

David Wilson
Senate District D

MEMBERS OF THE ALASKA STATE LEGISLATURE

August 20, 2022

Steve Cohn, Director
U.S. Bureau of Land Management-Alaska
222 W. 7th Avenue, Stop #13
Anchorage, AK 99513

Re: Support for the Willow Project Draft SEIS Alternative E

Dear Director Cohn:

We write today to provide comment on the Willow Project draft Supplemental Environmental Impact Statement (SEIS) and convey our support for Alternative E.

Alaskans rely upon oil and gas production, as well as other natural resources, to sustain our lives. It is of the utmost importance that our resources be developed with the highest environmental standards to safeguard our great State for future generations. We are proud of the fact that oil production on the North Slope and transportation through the Trans-Alaska Pipeline System (TAPS) 800-miles to the terminus in Valdez is consistently accomplished in an environmentally sound manner. We have every reason to believe that Alternative E will continue this record of great stewardship.

During the many years of the Willow Project EIS process much public scrutiny has concluded with SEIS Alternative E that modified the EIS to include additional environmental protections. Several other alternatives have been extensively considered and have been determined to be cost prohibitive or have been determined by our courts to be flawed. The process has been engaged in faithfully by all participants and can be trusted to provide adequate environmental protections during the development of the natural resources.

It is this development that we would like to impress upon you as vitally important to us and the many Alaskans we represent. The Willow Project is anticipated to

generate billions of dollars in state revenue, thousands of construction jobs, and hundreds of permanent positions bringing much needed economic activity to many diverse communities throughout Alaska. These economic benefits, along with federal royalties and local property taxes for remote communities on the North Slope, make the Willow Project a priority for Alaska lawmakers.

The Willow Project will also promote national energy independence by increasing our supply of domestic oil by approximately 180,000 barrels per day. With world-wide demand for oil projected to continue to increase for decades, the Willow Project is critically important to maintaining stable economic conditions as the world transitions to other renewable energy sources.

It is with great hope for the future economic security of Alaskans and the Nation, and the protection of our great State, that we respectfully request that you approve the SEIS Alternative E and a path forward for the Willow Project.

Sincerely,

Rep. Rauscher
District 9

Rep. Carpenter
District 29

Rep. Tilton
District 12

Rep. Gillham
District 30

Rep. McKay
District 24

Rep. Kaufman
District 28

Rep. McCabe
District 8

Rep. Shaw
District 26

Rep. Cronk
District 6

Rep. LeBon
District 1

Rep. Johnson
District 11

Rep. Thompson
District 2

Rep. McCarty
District 13

Rep. Rasmussen
District 22

Rep. Vance
District 31

Rep. Nelson
District 15

**TRADE ASSOCIATIONS
LETTERS OF SUPPORT FOR THE WILLOW PROJECT
RESOURCE DEVELOPMENT COUNCIL**

July 27, 2022

Steve Cohn, State Director
Bureau of Land Management, Alaska
222 W. 7th Avenue, Stop #13
Anchorage, AK 99513

Re: Comments on the Willow Master Development Plan (MDP) Draft Supplemental Environmental Impact Statement (DSEIS); NEPA #DOI-BLM-AK-0000-2018-0004-EIS

Dear State Director Cohn:

The Resource Development Council for Alaska, Inc. (RDC) submits the following comments to the Bureau of Land Management's (BLM) above-referenced document. RDC is a statewide trade association comprised of individuals and companies from Alaska's fishing, tourism forestry, mining, and oil and gas industries. RDC's membership includes Alaska Native corporations, private companies, nonprofit entities, local communities, organized labor, and industry support firms. For 47 years, RDC has advocated for a strong, diversified private sector in Alaska and to expand the state's economic base through the responsible development of our natural resources. The Willow Project is such an example.

RDC encourages the BLM to move forward in finalizing the DSEIS without any further delay or extensions. After many years of rigorous environmental review and analysis, including complying with additional court-ordered review, the DSEIS presents a reasonable alternative that responds to the court's concerns and was developed in coordination with cooperating agencies and stakeholders. The current comment period is adequate time to review limited, new information.

Extensive Analysis and Public Input; Court Concerns are Addressed

Since 2017, RDC has submitted several comments letters and testified in support of the Willow Project. RDC continues to support the project in this current phase of review. The extensive effort and scientific analysis BLM and other cooperating agencies provided culminated in a FEIS and ROD in 2020 approving the Project. BLM's extensive analysis was in cooperation with multiple state, federal, and local cooperating agencies, with extensive stakeholder engagement public hearings, scoping meetings, and consultations. This includes now approximately 215 days of days of public comment (including this current comment period), two public scoping periods, and thirteen in person public meetings held in Anchorage, Fairbanks, Nuiqsut, Utqiagvik, Atkasuk, and Anaktuvuk Pass. (It is important to emphasize this does not count the extensive and numerous efforts the BLM staff engaged in to find new ways to continue to engage the public and progress permitting when the pandemic hit in 2020, including holding virtual meetings to allow public engagement virtually by phone, virtual conferencing, and local radio broadcasts. By some counts, these additional meetings bring the number of public meetings closer to 25.) RDC applauds the extensive efforts of BLM to engage in a thorough, multi-year analysis of the project based in science and supported by the research; however, it is time to bring that process to a close and let the project proceed to development.

This current phase of review, the DSEIS, is the result of a remand decision in August 2021, by the U.S. District Court for Alaska. That remand order, which was not contested by the Project Proponent, identified specific categories of deficiencies that required additional analysis. In response, this past spring, BLM opened a public scoping period to assess the scope of the additional court-ordered review. RDC submitted comments encouraging BLM to focus solely on the narrow issues identified by the court remand decision. Importantly, multiple other aspects of the 2020 Willow MDP FEIS were unaffected by the court's remand decision. The unaffected parts of the previous environmental review for the Willow Project do not need to be revisited.

Upon initial review of the DSEIS, RDC applauds BLM for maintaining a narrow focus to the court issues and commonsense approach to this years-long, extensive environmental review of the Willow MDP. The DSEIS makes it easy to identify the new analysis and the new "Alternative E: Three-Pad Alternative (Fourth Pad

Deferred)” (“Alternative E”) developed in direct response to the court order. The current comment period is more than adequate to review the limited new information and comment. Further delay will only add to additional, unnecessary costs and cause potential loss of another valuable construction season.

Alternative E reduces the scope, and consequently, the footprint and impact of the project. In several ways, this addresses many concerns most often expressed by Project opponents. First, it reduces and realigns the number of drilling sites (from 5 down to 4, but only 3 would be approved as currently proposed in the DSEIS). Alternative E further reduces the amount of roads, both gravel and ice, needed for the Project, which also reduces freshwater usage; reduces the amount of infield pipelines; realigns the Project to avoid yellow-billed loon buffer zones; and reduces the length of airstrips needed. Most of these reductions take place in or near the Teshekpuk Lake Special Area (TLSA); again, an area of most concern to opponents. Additionally, in its updated analysis of greenhouse gas (GHG) emissions as part of the Climate and Climate Change analysis and in response to the court’s remand order, the DSEIS concludes Alternative E has the lowest overall GHG impacts than any other previously considered action alternative based on current U.S. standards for modeling GHG impacts. The DSEIS adequately addresses both the direct and indirect as well as cumulative GHG impacts of the Project. Further review concludes cumulative impacts on coastal subsistence communities is expected to be low. Overall, proposed Alternative E reduces the footprint and surface infrastructure of the project within TLSA presenting a reasonable path forward supported by BLM’s environmental analysis. The DSEIS directly addresses the court’s concerns.

The Willow Project Brings Economic and Energy Independence for All

RDC understands that Alternative E was developed by BLM together with cooperating agencies and stakeholders as a compromise to address the court’s concerns. Key stakeholders for this project include Alaska Native individuals, communities, and entities of Alaska’s North Slope region. The project falls within the North Slope Borough (NSB), whose territory includes the NPR-A. Key villages within the NSB include Nuiqsut, Utqiagvik, Point Lay and Wainwright. Other key Alaska Native entities include the Inupiat Community of the Arctic Slope (ICAS), the Arctic Slope Regional Corporation (ASRC), the Alaska Native regional corporation for the North Slope established pursuant to the Alaska Native Claims Settlement Act of 1971 (ANCSA). Representing more than 10,000 Alaskans and Alaska Native individuals, these stakeholders overwhelmingly support the Willow Project. RDC encourages BLM to give all due respect to the cultural and economic arguments, including subsistence concerns, set forth in a joint letter by ICAS, ASRC, and the NSB dated July 21, 2022, and that was recently submitted to the public record for this Project.

The Willow Project is in the National Petroleum Reserve-A (NPR-A), a 23-million acre reserve specifically set aside by Congress in 1923 for its petroleum value to ensure American energy independence. The NPR-A is larger than the state of Maine and the Willow Project represents just a small fraction of that area. With Alternative E, that fraction becomes even smaller. The Willow Project will provide key economic investment at all levels of government, as well as the private sector. The Willow Project is estimated to contain as much as 600 million barrels of oil and peak daily production could exceed 180,000 barrels per day over a thirty-year period. This production would substantially boost throughput in the Trans-Alaska Pipeline System (TAPS), running at times one-fourth of its capacity, and will extend the life of TAPS for decades to come. It is estimated the Project will provide nearly \$9 billion in economic benefits through federal, state, and local government royalties and revenues from production, as well as property and income taxes. More than 2,000 construction jobs will be created, including 300 long-term jobs in Alaska. Clearly, Willow production will help fulfill the primary purpose of the NPR-A, which is to develop American energy resources. It is paramount that BLM provide access to prospects in this region with the highest potential as Congress intended.

In closing, after several years of rigorous environmental review, extensive regulatory assessment, court review, and supplemental analysis, it is time to permit this project. The science-backed data supports the conclusion that the Willow Project is an environmentally and socially responsible resource development project. With its smaller footprint, this Project will also play a critical role in the clean energy transition. RDC encourages BLM adopt Alternative E and permit the Project without further delay.

Sincerely,

LEILA KIMBRELL,
Executive Director

ALASKA OIL & GAS ASSOCIATION (AOGA)

July 21, 2022

Ms. Stephanie Rice, BLM Project Manager
Bureau of Land Management
222 W. 7th Avenue, Stop #13
Anchorage, AK 99513

To Whom It May Concern:

The Alaska Oil & Gas Association (AOGA) is a professional trade association whose fourteen member companies account for most of the oil and gas exploration, development, production, transportation, and refining activities in Alaska. As Alaskans, we advocate for the long-term viability of the industry in our state.

On July 8, 2022, the Bureau of Land Management (BLM) issued a Supplemental Environmental Impact Statement (SEIS) for the Willow project with comments due August 29, 2022. Normally, AOGA's comments are submitted at the end of the comment period, but this time, it is important for our voice to be heard earlier in the process.

AOGA has been involved in every step of the regulatory process for this project from the very beginning. After the Willow exploration wells were drilled in 2016, and the discovery was announced in 2017, ConocoPhillips requested the BLM start the environmental review and permitting of this project in May 2018, over 50 months ago. The scoping process for this project started in August 2018 and BLM published the first draft EIS in 2019. After revising the project following stakeholder input, BLM issued a supplement to that draft EIS in 2020.

Following the final EIS and Record of Decision (ROD) in 2020, BLM's decision was challenged in court by environmental organizations, with most of them based outside the state of Alaska. The court vacated the ROD in August 2021 based on a limited number of issues. As BLM conducted another environmental analysis to develop this current SEIS, they opened an informal scoping period earlier this year, which opened the fourth round of public comment for this project. This scoping process was not required, but it added another opportunity for the public to express opinions about Willow, and the response from Alaskan communities, organizations, and governments were overwhelmingly very supportive. It is not common to see such diverse support for an Alaskan project, from residents of the North Star Borough, and the Inupiat Community of the Arctic Slope, to organizations like the Alaska Federation of Natives, Alaska Petroleum Joint Crafts Council (labor unions), Alaska Chamber of Commerce (business), and Associated General Contractors.

To address the concerns raised by the court, BLM developed their own Alternative (Alternative E) which further minimize impacts while allowing needed development to proceed. AOGA supports this alternative as it is a creative solution that reduces the surface impact in the area, especially in the Teshekpuk Lake region.

World dynamics have intensified the need for more energy production, especially from America. The additional jobs would also be a boost to Alaska's economy as oil and gas jobs have yet to recover to pre-pandemic levels, and the project will provide significant revenues to the local, state, and federal government.

Before the SEIS was even issued two weeks ago, there were calls to extend the current public comment period. The public had not even seen the report, and some were clamoring for additional time. This is now the fifth public comment period for a project that drilled its first exploration well over six years ago.

Willow is likely one of the most studied and analyzed projects in the country, with extensive opportunity for public engagement. This draft SEIS was rigorously and punctiliously developed by BLM after the court remanded it to them almost 12 months ago. If an extension was granted, it would delay the agency's ability to make a final decision until late in 2022 or early 2023, which means Alaskans would lose out on the jobs and revenues created by a construction season in 2023.

AOGA strongly encourages the BLM to adopt Alternative E and issue a final EIS and ROD in a timely manner and urges the BLM to not extend the current comment period.

Sincerely,

KARA MORIARTY,
President/CEO

**ALASKA OIL & GAS ASSOCIATION • ALASKA CHAMBER
ALASKA MINERS ASSOCIATION • ALASKA TRUCKING ASSOCIATION
ALASKA POLICY FORUM
ASSOCIATED GENERAL CONTRACTORS OF ALASKA
COUNCIL OF ALASKA PRODUCERS • KEEP ALASKA COMPETITIVE
THE ALLIANCE • RESOURCE DEVELOPMENT COUNCIL**

February 2, 2021

Hon. Deb Haaland, Secretary Nominee
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Nominee Haaland:

As the leading business organizations in the state of Alaska representing over 1,500 companies with approximately 100,000 employees, we are concerned about reports following President Biden's Executive Orders in his first week of office that the Department of Interior intends to review currently issued Environmental Impact Statement (EIS) Record of Decisions (ROD) across the country, including the potential to review the ROD for the Willow Project in the National Petroleum Reserve-Alaska (NPR-A).

The Willow project was designed to meet requirements of the 2013 NPR-A Integrated Activity Plan (IAP), issued by the Obama-Biden Administration, and signed by Secretary Salazar, with stringent requirements for environmental protection. In fact, there are currently roughly 270 mitigation measures and best practices already in place for NPR-A development through the 2013 IAP, which the Willow Project was designed to comply with.

After the Willow Project discovery, the Bureau of Land Management (BLM) was requested to begin the EIS process in May 2018, and the Notice of Intent from DOI was issued in August 2018. The entire EIS process took over two years to complete, with the Record of Decision issued on October 26, 2020. Yesterday, U.S. District Court Judge Sharon Gleason denied in full preliminary injunction motions filed by environmental advocacy organizations in two separate cases challenging the Record of Decision. It is interesting to note that Mayor Harry Brower of the North Slope Borough provided a declaration in support to allow the Willow Project to proceed.

The current EIS ROD for Willow was not an expedited process. Over the course of 26 months, more than 100 public meetings with North Slope stakeholders were held, over 140 days of public comment, with in-person, virtual public meetings, and local radio broadcasts. The final EIS document is over 2,600 pages of detailed analysis.

Based on this thorough public review, and in-depth environmental review, we do not understand the rationale for this potential review of the ROD analysis for Willow. The BLM efforts over the last 2+ years address the issues raised through the public comment process, and the hundreds of stipulations and best management practices the project will be required to follow.

It is our respectful request that the Department of Interior not delay the Willow Project, and not require any additional analysis given the extensive and exhaustive nature of the process used to perform the approved Willow EIS.

The Willow project is very important to the state of Alaska. Alaska's economy has been devastated by the COVID-19 pandemic and there are very few projects, if any in our state, that have the potential to bring over 2,000 construction jobs, with roughly 75% of the installation manhours union labor, and hundreds of long-term jobs. Oil and gas drives over 20% of the Alaskan economy. Many of the companies and their employees represented by the organizations signing this letter depend on the direct, indirect, and induced jobs the oil industry provides, and will suffer economic harm if the Willow project is deferred or canceled. The project is also slated to bring in significant revenue to federal, state, and local governments which is critical in Alaska's efforts to recover from the pandemic.

Importantly, the Willow Project will also benefit the entire indigenous population of the North Slope region. The BLM estimates the project will generate over \$1.2

billion in property tax to the North Slope Borough alone over the life of the project, and \$2.6 billion for the NPR-A Impact Mitigation Grant Program, under which North Slope communities have the highest priority for use of the funds. These revenues benefit all the communities in the region, supporting schools, emergency response, health clinics, drinking water, wastewater, roads, utilities, and solid waste.

We urge your support for the current ROD and allow the Willow project to proceed as planned and approved.

Respectfully,

Kara Moriarty, President/CEO,
Alaska Oil & Gas Association

Kati Capozzi, President & CEO,
Alaska Chamber

Deantha Skibinski, Exec. Director,
Alaska Miners Association

Joe Michel, Executive Director,
Alaska Trucking Association

Bethany Marcum, Executive Director,
Alaska Policy Forum

Alicia Siira, Executive Director,
Associated General Contractors of
Alaska

Karen Matthias, Executive Director,
Council of Alaska Producers

Elizabeth Stevens,
Keep Alaska Competitive

Rebecca Logan, President and CEO,
Alaska Support Industry Alliance

Marleanna Hall, Executive Director,
Resource Development Council for
Alaska, Inc.

GLOBAL ENERGY INSTITUTE
U.S. Chamber of Commerce

August 29, 2022

Steve Cohn, State Director
Bureau of Land Management, Alaska
222 W. 7th Avenue, Stop #13
Anchorage, AK 99513

Re: Bureau of Land Management; Willow Master Development Plan (MDP) Draft Supplemental Environmental Impact Statement (DSEIS); NEPA #DOI-BLM-AK-0000-2018-0004-EIS (July 8, 2022)

Dear State Director Cohn:

The U.S. Chamber of Commerce (“Chamber”) appreciates the opportunity to comment on the Willow Master Development Plan (MDP) Draft Supplemental Environmental Impact Statement (DSEIS) proposed on July 8, 2022.

The Chamber represents members in every sector of the economy who all depend on affordable and reliable energy sources. ConocoPhillips’ proposed Willow project, and development of the National Petroleum Reserve-Alaska (NPR-A) generally, represent a crucial addition to U.S. energy security, providing significant additional domestic energy under some of the strictest environmental standards in the world. As such, the Chamber supports the Bureau of Land Management’s (BLM) proposed Supplemental EIS for the Willow project and encourages it to adopt Alternative E without delay.

Energy Security

Development of the Willow project represents a critical opportunity to increase U.S. energy security by adding an additional source of domestic oil production. BLM estimates, Willow will produce an estimated 180,000 barrels of oil per day at its peak. Moreover, throughput for the Trans-Alaska Pipeline System (TAPS) has been declining for over a decade, increasing the risk that it will fall below the required

amount necessary to continue operating and supplying oil to the rest of the U.S., especially West Coast refineries. The estimated production rate from Willow will increase the current TAPS throughput by 20% and ensure its long-term viability.

Additionally, Russia's illegal and unprovoked invasion of Ukraine has diminished the energy security of the U.S. and our allies. Europe and Asia are preparing for a winter heating season with far less Russian energy imports, driving up prices to unprecedented levels and threatening physical supplies of energy commodities. This situation highlights the importance of increased and reliable production of oil and natural gas from the United States as a geopolitical foil to Russia's use of energy exports in an attempt to undermine global support for Ukraine and its defense. As one of the largest exporters of petroleum in the world, the United States' ability to facilitate global diversification from Russian energy will be enhanced by the Willow project.

ECONOMIC & ENVIRONMENTAL BENEFITS

BLM's DSEIS estimates development of the Willow project could generate between \$8 and \$17 billion in new revenue for the federal government, the State of Alaska, and communities in and adjacent to NPR-A. BLM further estimates Willow will provide between \$1.3 and \$5.2 billion in State of Alaska revenue from production, property, and income taxes and over \$1.2 billion in North Slope Borough (NSB) revenue from property taxes. Additionally, Willow is expected to create as many as 2,000 jobs during construction.

Global oil markets are expected to remain tight for the foreseeable future, and global oil demand is projected to remain strong in the long term. Oil supply from Willow will provide some of the most technologically advanced and environmentally and socially responsible barrels produced in the world, providing a net reduction in greenhouse gasses as it displaces overseas imports with higher greenhouse gas intensity. The International Energy Administration estimates that the methane intensity of oil and gas production in Russia is 30 percent higher than in the United States. Emissions in Iran are 85% higher for each unit of energy produced, and Venezuela is off the charts at 652% higher.¹

TIMELINESS

The Willow project has undergone nearly five years of rigorous regulatory review and environmental analysis, including extensive scientific analysis. The Draft Supplemental Environmental Impact Statement provides a new Alternative (Alt E) developed by BLM and cooperating agencies in consultation with stakeholders in response to the decision in August 2021, by the U.S. District Court for Alaska, remanding BLM's previous DEIS to BLM. Alt E represents a good path forward for the Willow project and significantly reduces surface impacts.

The Chamber supports BLM's effort to narrowly focus the DSEIS on the issues raised by the remand decision. The DSEIS's development of a new "Alternative E: Three-Pad Alternative (Fourth Pad Deferred)" ("Alternative E") directly and adequately addresses the court order. The draft supplemental EIS is extensive and thorough at over 400 pages long.² There has been extensive public involvement, including more than five public comment periods, 215 days of public comment, a public scoping period, and 25 public meetings.

Accordingly, the Chamber encourages BLM to finalize the Willow Project without further delay to avoid additional increases to development costs and potentially cause the project to miss loss of another construction season.

Thank you for considering our comments.

Sincerely,

CHRISTOPHER GUTH,
Senior Vice President

¹ Greater U.S. Energy Production Is Needed to Reduce Reliance on Authoritarian Regimes, Global Energy Institute, Dan Byers, April 5, 2022, <https://www.globalenergyinstitute.org/greater-us-energy-production-needed-reduce-reliance-authoritarian-regimes>.

² Willow Master Development Plan, Draft Supplemental Environmental Impact Statement, Bureau of Land Management, July 2022, https://eplanning.blm.gov/public_projects/109410/200258032/20063228/250069410/Vol%201_Willow%20Draft%20Supplemental%20EIS_July%202022.pdf.

NATIONAL ASSOCIATION OF MANUFACTURERS

August 29, 2022

Ms. Stephanie Rice
BLM Project Manager
Bureau of Land Management
222 W. 7th Avenue, Stop #13
Anchorage, AK 99513

Re: Willow Master Development Plan (MDP) Draft Supplemental Environmental Impact Statement (DSEIS); NEPA No. DOI-BLM-AK-0000-2018-0004-EIS

As the nation's largest manufacturing association, the National Association of Manufacturers represents nearly 14,000 small, medium and large manufacturers in every industrial sector and in all 50 states. Manufacturers in America are committed to the communities in which they live and serve, and are dedicated to protecting the health, safety and vibrancy of those communities. Through constant innovation, investment and dedication, manufacturers in the U.S. have become leaders in environmental stewardship and sustainability, while continuing to be the engine that drives the nation's economic growth and prosperity. Today's domestic manufacturing sector is a clean and efficient operation that is technology driven and dedicated to the planet and its people.

Manufacturers and their families are facing record-high energy prices, but it could be far worse if not for domestic energy production. We are working hard to be part of the solution and have urged President Biden and his Administration to take actions to increase domestic energy production to ease some of the strains on the economy and improve the competitiveness of manufacturing in America. Yet we continue to see opportunities missed as projects are canceled and delayed because the Administration fails to follow through on supporting domestic energy production.

Access to reliable, affordable energy is essential for manufacturers to compete in the global marketplace. The NAM supports a diverse approach to powering manufacturing operations, including the responsible development and use of all energy sources, including fossil fuels. There are abundant and reliable oil and natural gas resources in America, and global demand for these resources has continued to increase. For manufacturers, U.S. domestic oil and natural gas supply is a critical component of our energy security. In today's global economy, U.S. manufacturers must be assured of an adequate supply of competitively priced and reliable oil and natural gas industrial and commercial use.

For these reasons the NAM supports ConocoPhillips' Willow project in Alaska. The project will produce up to 180,000 barrels of oil per day and create 2,000 jobs and an additional 300 operating jobs. The U.S. must continue to bolster domestic energy production and the Willow project presents an environmentally-sound and economically-smart opportunity to do just that. Manufacturers will benefit from domestic energy projects like the Willow project.

This summer BLM issued a Supplemental Environmental Impact Statement for the Willow project in Alaska that builds upon the initial EIS. At the end of this comment period, the Willow project will have undergone 215 days of public comment and 25 public meetings. The NAM urges BLM move quickly to approve this project so that development can begin ahead of the 2022-2023 winter season. Given the extensive environmental reviews the Willow project has already received, the NAM urges BLM to expeditiously evaluate the SEIS within the current comment period and approve this project to support domestic energy security.

The NAM appreciates this opportunity to voice support for the Willow project and implores BLM to promptly approve it. This is a critical opportunity to increase domestic energy production, enhance U.S. energy security and drive down energy prices.

Sincerely,

RACHEL JONES,
Vice President
Energy & Resources Policy

AMERICAN PETROLEUM INSTITUTE

August 29, 2022

Ms. Stephanie Rice, Project Manager
 Bureau of Land Management, Alaska State Office
 222 W. 7th Avenue, Stop #13
 Anchorage, AK 99513

Re: Willow Master Development Plan Draft Supplemental Environmental Impact Statement (“SEIS”), Comments due August 29, 2022

Dear Ms. Rice:

We are pleased to participate in the 45-day public comment period for the Willow Master Development Plan (“Willow Project”) Draft SEIS, and we submit written comments for your consideration. We appreciate the Bureau of Land Management’s (“BLM”) commitment to meaningful public engagement including extensive opportunities for the public to provide input on the critical energy infrastructure development proposed in the National Petroleum Reserve in Alaska (“NPR-A”).

The American Petroleum Institute (“API”) represents all segments of America’s oil and natural gas industry which supports more than 11 million US jobs and is backed by a growing grassroots movement of millions of Americans. Our approximately 600 members produce, process, and distribute the majority of the nation’s energy, and participate in API Energy Excellence®, which is accelerating environmental and safety progress by fostering new technologies and transparent reporting. API was formed in 1919 as a standards-setting organization and has developed more than 800 standards to enhance operational and environmental safety, efficiency, and sustainability.

With energy costs high for American consumers and European allies looking to the US for access to an affordable and stable energy supply, we urge the BLM to provide regulatory certainty with timely approvals in federal environmental reviews for energy infrastructure projects. Clear, robust, and timely completion of federal reviews for energy infrastructure is vital for ensuring that American producers meet rising demand at home and abroad and continue to provide reliable energy.

Allowing safe and responsible energy infrastructure projects such as the fully-vetted Willow Project to proceed without any further delay, is critical to securing much needed Alaskan energy development and for ensuring overall US energy security.

We provide the following overall comments for your consideration:

- ***Energy Infrastructure Projects are essential for domestic energy security and for meeting global energy demands.*** Overall, responsible, safe, and efficient development and maintenance of vital energy infrastructure projects such as the Willow Project will serve the national interest by providing secure domestic energy supplies for the nation and our wider interests, strengthen our national security, all while being the engines for increased revenues and job creation for US and local Alaskan economies.
- ***Energy Infrastructure Projects contribute to more jobs and increased tax revenues.*** Energy Infrastructure projects provide enormous benefits to the local economies and here, the Willow Project is expected to create as many as 2,000 jobs during construction and an estimated 300 permanent jobs.¹ Another key benefit is that development projects such as this result in significant tax and royalty revenues for local, state, and federal governments providing much needed economic stimulus.² In fact, any delayed timing of a final decision would not serve any public benefit and could hamper access to vital economic opportunities given Alaska’s short and limited seasons for construction.

¹Project description available at: <https://static.conocophillips.com/files/resources/22copa013-willow-fact-sheet-r7-19-12.pdf>.

²See for e.g. Draft SEIS, Table 3.15.5 (Summary of State, Federal, and Borough Revenues from the Project).

- ***Timely completion and approvals of fully-vetted federal reviews for energy infrastructure projects is crucial for regulatory certainty.*** Energy projects are subject to rigorous federal environmental reviews, and in this case, the Willow Project has undergone comprehensive review process lasting more than four years, with extensive opportunities for public comment.

The BLM scoping process for Willow Project began in 2018 followed by the issuance of a draft EIS the following year. With public input and a SEIS issued, the BLM issued a Final SEIS and a ROD. Following litigation and a court decision that found fault with two discrete areas of the SEIS, BLM conducted an extensive and rigorous review with numerous opportunities for public input. This culminated in the issuance of the Draft SEIS with more opportunities for public input including a 45-day window for written comments as well as opportunities to participate in six public meetings. This extensive review has also included meaningful input from many federal, state, and local governments as well as local communities. The Willow Project located within the NPR-A is consistent with 2022 NPR-A Integrated Plan. Clearly, it is time now to complete the federal review process and to allow the project to proceed expediently.

Any unreasonable delays in key infrastructure projects create regulatory uncertainty and add further obstacles for developing critical investment in American oil and natural gas and associated infrastructure, which provide nearly 70% of our country's energy needs. Such delays would likely have a chilling effect on vital energy projects and long-term investment decisions at a time when harnessing American energy is critical to national security. Overall, this would hamper our ability to address domestic and global energy needs, as well as undoubtedly add further costs to the already-burdened American consumers.

- ***Safe and responsible development of energy resources within the NRA-A including the Willow Project has widespread support amongst the affected communities, including Alaska Natives.***³ As noted by Senators Murkowski and Sullivan, "Alaska Natives are also especially supportive of this project, as it would contribute to their economic well-being and prosperity for years to come."⁴ The Senators support this statement with specific references to comment letters from wide-ranging community members including leaders of the Alaska Federation of Natives, Alaska Native Village Corporation Association, and ANCSA Regional Association, as well as the North Slope communities of Utqiagvik, Wainwright, and Atkasuk.⁵

Also, as recently noted by the Inupiat Community of the Arctic Slope ("ICAS"), North Slope Borough, and the Arctic Slope Regional Corporation ("ASRC") in a comment letter filed with the BLM, "[a]ll 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 that, "loss of economic activity on the North Slope means lost jobs and lost opportunities for people in a region where economic opportunity is generally low, and the cost of living is extremely high."⁶

³See for e.g. "Alaskans voice strong support for Willow Project." Available at: <https://www.murkowski.senate.gov/press/release/alaskans-voice-strong-support-for-willow-project>.

⁴Letter from Senators Lisa Murkowski and Dan Sullivan to U.S. Department of Interior Secretary Debra Haaland, July 15, 2022. Available at: [https://www.murkowski.senate.gov/imo/media/doc/7.15.22%20-%20Alaska%20Delegation%20Letter%20to%20Secretary%20Haaland%20re.%20Willow%20SEIS%20\(003\).pdf](https://www.murkowski.senate.gov/imo/media/doc/7.15.22%20-%20Alaska%20Delegation%20Letter%20to%20Secretary%20Haaland%20re.%20Willow%20SEIS%20(003).pdf).

⁵Id.

⁶Comment letter filed with the BLM by ICAS, North Slope Borough, and ASRC, July 21, 2022. Available at: https://eplanning.blm.gov/public_projects/109410/200258032/20064382/250070564/ICAS_NSB_ASRC_Willow_Ltr_Sec_Haaland_07_21_2022.pdf.

We appreciate the opportunity to comment on this matter. Overall, we ask the BLM to remain committed to facilitating federal environmental reviews and permitting in a timely manner, and to move forward with the Willow Project without any further delay, especially given the tremendous public benefits expected from the project. Approval of key infrastructure energy projects such as Willow Project is critical for the safe and clean development of the nation's vast energy sources and in the long-term, will serve to strengthen US economic and energy security.

Thank you for your time.

Sincerely,

AMY EMMERT,
Senior Policy Advisor

