

WILLOW DRAFT EIS: TALKING POINTS

These talking points will help you speak out about why you oppose the Willow project and what you want BLM to do. Start out by expressing your opposition and concern:

- I am opposed to Willow because _____.
- I am concerned about impacts to _____.
 - *Examples:* caribou, fish, water, my way of life, my community, marine mammals, air quality, public health, climate change...
- I am concerned about these impacts because _____.
- This area is important to me because _____.

MAIN POINTS

- BLM piled on project proposal documents and comment periods all at once—including those for Willow, the Ambler road, and the AKLNG gas line--making it impossible for people to weigh in on multiple proposals that interrelate, accumulate impacts, and will dramatically affect the entire Arctic region.
- BLM has made it hard for those most affected to participate in the public process.
- The proposed Willow project is massive--and so are its impacts to food access, human health, wildlife, waterways, lands, and climate.
- Willow will have huge impacts on special areas in the National Petroleum Reserve-Alaska and beyond, including the Teshekpuk Lake Special Area.
- BLM's draft EIS for Willow provides no meaningful alternatives to the ConocoPhillips proposal, defying legal requirements. BLM does not adequately acknowledge the health impacts that Nuiqsut residents and stakeholders have voiced concerns about.
- The value of the NPRA's subsurface oil and gas resources fluctuates with the price of oil (which today remains low) and an evolving global context in which nations must inevitably transition away from nonrenewable energy sources in favor of sustainable energy options.
- Nearly 60,000 caribou calve in the Teshekpuk Lake area that will be directly affected by the Willow project. The Teshekpuk Herd feeds five villages on the North Slope and the Willow project endangers Iñupiaq Peoples' food security.

EXTENDED POINTS--KEY CONCERNS ABOUT THE PROCESS & PROJECT:

- **BLM is piling on projects and making it impossible for Alaskans to weigh in on all the proposals that will dramatically impact the Arctic.**
 - BLM has a legal obligation to provide for public comment.
 - This obligation requires providing adequate time to read and respond to the BLM and proposed project documents.
 - BLM simultaneously opened comment periods on Willow and the proposed Ambler road, at the same time that the Federal Energy Regulatory Commission (FERC) was seeking comments on the DEIS for the AKLNG project.
 - In addition, BLM released the Arctic Refuge Coastal Plain Leasing Final EIS in mid-September; a Record of Decision is expected in October and a call for nominations for a lease sale following soon thereafter. BLM also plans to release a draft revised management plan (IAP/EIS) for the NPR-A in late October, before the close of the Willow DEIS comment period.

- o Overlapping public comment periods on several massive infrastructure projects in the Arctic undermines public participation, as people cannot adequately read and respond to numerous environmental documents simultaneously and within the brief allotted time periods.
- o We need time to not just read and respond to the draft EIS for Willow, but also to multiple projects that interact and accumulate impacts to the Arctic—(including to public health, sacred lands, food access, special areas, wildlife, the climate crisis, and more)
- **BLM is not providing adequate or meaningful participation for the people and communities most affected by the project because it has scheduled a short comment period during whaling and other food harvest seasons.**
 - o People who live in these communities rely on these harvest seasons for food and their way of life.
 - o BLM has not properly reached out to stakeholders outside of these communities who have family ties to the places affected by this project.
 - o Communities directly affected by the Willow Project cannot attend the large number of meetings being held by BLM.
 - o Environmental groups, the Native Village of Nuiqsut, and the North Slope Borough requested BLM extend the comment period by 62 days, 60 days, and 45 days, respectively, to ensure meaningful participation by local communities and others, since the comment period overlaps important whaling and other harvest seasons. The request letter submitted by NVN stated, “BLM is well aware of the timing and importance of whaling to our community; therefore, we are surprised the agency is planning to limit its brief comment period to a time when many of our members will be unable to review the EIS or attend the single public meeting in our community to discuss the proposal.” Despite this, BLM provided only two additional weeks, far short of what was requested and needed for the public to weigh in on this massive project.
- **BLM has not adequately addressed health impacts about which Nuiqsut residents and other stakeholders have voiced serious concern.**
 - o Nuiqsut, surrounded by oil and gas development, is already experiencing negative effects of the current development on residents’ health and wellbeing. There are reports showing implications to reproductive health, cancer, asthma, loss of taste and smell, cognitive issues in growing children, and a slew of other health impacts that have not been addressed or acknowledged by BLM. These reports need to be prioritized by BLM when assessing impacts
 - o Nuiqsut residents [have voiced major concerns about air quality](#) because of the surrounding oil fields and projects. These projects need to slow down and the safety of human health should be fully addressed before any other projects are started.
 - o Many community members of Nuiqsut have said the [2012 Repsol blowout](#) negatively affected their health. Since then, there have been no protocols put into place to prevent health impacts in cases of emergencies within the oil and gas fields.
 - o Community members have spoken at BLM meetings in objection to any other extractive projects around Nuiqsut and within the NPR-A until there is a conclusive third party health agency to address toxics released by industrial projects.

- o Community members have voiced major concerns for health impacts to BLM for prior projects that have not been properly addressed. Before starting another project, BLM needs to have meaningful conversations and take actions to protect community members.
- o BLM did not provide a separate Health Impact Assessment, despite requests from the Native Village of Nuiqsut (NVN) and others to conduct such an assessment.
- **The proposed Willow project will have significant impacts on the entire region and in the National Petroleum Reserve–Alaska (NPR-A) — particularly on the Teshekpuk Lake Special Area.**
 - o Teshekpuk Lake is one of the most productive wetland complexes in the Arctic and an important calving ground for the Teshekpuk Lake Caribou Herd, an important food and cultural foundation for communities on the North Slope.
 - o The Teshekpuk Caribou Herd is a crucial food resource for five North Slope villages. Approximately 95 percent of the caribou harvested by the communities of Utqiagvik (formerly Barrow) and Atkasuk and 85 percent of the caribou harvested by Nuiqsut come from this herd. The Willow project puts Iñupiaq peoples’ food security in danger.
 - o The polar bear is another hunted species, although climate change and other exacerbating pressures, including increased development, may put this time-honored tradition at risk.
 - o Teshekpuk Lake is a spiritual place for Inupiaq people. Inupiaq peoples are the caretakers for the lake and have stood in solidarity since the incorporation of the NPR-A to protect Teshekpuk Lake.
 - o Teshekpuk Lake is the largest lake in Alaska’s Arctic and the largest thermokarst lake in the world. The Teshekpuk Lake wetlands complex provides staggering bird and wildlife value: more than 78,000 molting geese of several species, approximately 600,000 shorebirds, high densities of loons and eiders, denning polar bears, and tens of thousands of caribou forming the Teshekpuk Caribou Herd.
 - o The Secretary of the Interior designated Teshekpuk Lake as a Special Area in 1977 and has repeatedly voted for this area to remain protected. Congress expressly recognized this area as one having significant subsistence, recreational, fish and wildlife, and historical and scenic values, for which BLM is obligated to provide maximum protections. The 2013 Integrated Activity Plan for the NPR-A expanded the Special Area and protections because of its high conservation and subsistence values.
- **The value of the NPR-A’s subsurface oil and gas resources fluctuates with the price of oil (which today remains low) and an evolving global context in which nations must inevitably transition away from nonrenewable energy sources in favor of sustainable energy options.**
 - o Maintaining Arctic areas that are entirely free from development will provide wildlife with much-needed space to remain resilient or even adapt to climate change and cumulative impacts.
- **This proposed project is massive and so are its impacts.**
 - o The master development plan for this project includes a new central processing facility within the NPR-A, up to five drill pads with up to fifty wells on each pad, an

extensive road system, an airstrip, pipelines, a gravel mine, and a gravel island in Harrison Bay.

- o In the Greater Moose's Tooth 1 EIS, BLM determined a single drill pad would significantly impact the people of Nuiqsut, who use these lands to harvest food and enact their traditions, culture, and way of life, yet they are considering 5 drill pads and up to 250 wells with the project.
 - o The proposed gravel Module Transport Island in Harrison Bay would have significant impacts on whaling in the community of Nuiqsut. The community has raised concerns over this island, yet BLM has refused to consider another option that may be less damaging to Nuiqsut.
 - o BLM's analysis of marine mammal impacts from the construction and use of a gravel island in Harrison Bay is inadequate. Impacts are only analyzed for species present during the winter (polar bears, ice seals), even though Harrison Bay is important to bowhead whales during the open water season. Barge and vessel traffic effects on bowhead whale use of this area and impacts to access for whale harvests must be considered.
 - o BLM assumes pile driving work will occur through shore fast ice, which will eliminate underwater noise. BLM fails to consider what may happen in the absence of insufficient ice formation due to climate change.
 - o Conoco's proposal further involves building seven bridges within the project area, yet any one bridge has the potential to significantly affect wetlands, fish passage, and water flow.
 - o The proposed project includes seawater and diesel fuel pipelines UNDER the Colville River. The potential for spills and diesel fuel and seawater incursion into the Colville is too great a risk to take. No safety measure can guarantee that this will never occur.
- **BLM's draft EIS unlawfully fails to consider real alternatives to the ConocoPhillips proposal.**
 - o The National Environmental Policy Act requires the BLM to consider alternatives to those proposed by industry. The draft EIS does not.
 - o All the alternatives in the draft EIS involve an offshore gravel island; a new airport west of Nuiqsut; a gravel mine inside the Colville River Special Area; and infrastructure inside of the Teshekpuk Lake Special Area.
 - o The draft EIS states that the No Action Alternative cannot be selected as it does not meet ConocoPhillips' proposed project's purpose and need. This implies that the proposal is a done deal.
 - o BLM should not conflate its purpose and need to be ConocoPhillips' purpose and need. BLM must consider the option of selecting the No Action alternative should they find that it best protects surface resources and prevents unnecessary and undue degradation of lands within the NPR-A.
 - o BLM is letting ConocoPhillips drive the process, abdicating its responsibility to the law and the public's interest.
 - **BLM has not fully considered the cumulative impacts of further development in the western Arctic.**

- o Greater Moose's Tooth 1 and 2 have just been completed, and more studies are needed before BLM and other permitting agencies can understand the extent of impacts from those projects on the area.
- o The Willow proposal's central processing facility, pads, roads, and gravel islands and their river crossings will negatively impact vegetation, permafrost conditions, waterways, and wildlife (both onshore and marine mammals).
- o The area in particular and Arctic at large are already suffering the stress of climate change, and the Willow proposal fails to address how it will add to or address those impacts.
- o BLM failed to include all RFFAs (reasonably foreseeable future actions) in analyzing cumulative impacts. For example, the Special Alaska Lease Sale Areas, or SALSA, includes several blocks in state waters of Harrison Bay that are being offered for lease in fall 2019, yet they were not included in the RFFAs, despite adjacency to the proposed gravel island.

Information collected by: Northern Center, Native Movement, Trustees for Alaska, and Audubon Society.