

## National Petroleum Reserve - Alaska Integrated Activity Plan (IAP) Draft EIS Talking Points

**Comment period closes January 21, 2020 at 10pm Alaska time**

These talking points will help you express your concerns with the BLM's draft revised IAP and what you want BLM to do. Speak to what's important to you, and born out of your own values and experiences. Use your own words. Examples:

- I am opposed to BLM's revision process for the IAP because \_\_\_\_\_.
- I am concerned about impacts to \_\_\_\_\_ because \_\_\_\_\_.
- The proposed alternatives BLM is considering do not go far enough to protect \_\_\_\_\_.
  - *Examples:* caribou, fish, water, my way of life, my community, marine mammals, air quality, public health, climate change...
- This area is important to me because \_\_\_\_\_.
- I feel like BLM is burying us with so many project proposals and changes that I do not have time to look at and understand the consequences of everything.

### Talking Points & Issues of Concern

These are some of the concerns that we have after reading this document that should be helpful in framing your comments or testimony.

- The purpose and need for the revised IAP is industry driven and based on the false narrative of Secretarial Order 3352 to "effectuate the lawful review and development of a revised IAP for the NPR-A *that strikes an appropriate balance* of promoting development while protecting surface resources." (emphasis added)
  - The BLM's record of decision for the 2013 IAP states that the current plan "balances the secretary's responsibilities to provide for oil and gas leasing and to protect and conserve the important surface resources and uses of the Reserve."
  - The desire to exploit oil reserves discovered in 2015 and 2017 in the Nanushuk formation that underlies the Teshekpuk Lake Special Area is the true impetus for this rewrite. Seeking to open more areas to leasing is not "an appropriate balance"; it is tipping the scales in favor of industry.
- The alternatives BLM offers are false, limited choices dictated by the industry. All of the alternatives drive to more oil and gas, and none do enough to protect the Reserve's important resources.
  - Alternatives C and D would open 75% and 81% of the NPR-A to leasing, respectively, with both dramatically altering the Teshekpuk Lake and Utukok River Uplands Special Areas. Alternative D would make the *entire* Teshekpuk Lake Special Area available for leasing.
  - The Naval Petroleum Reserves Production Act of 1976 (the law that governs management of the NPR-A) requires oil exploration in areas with "significant subsistence, recreational, fish and wildlife, or historical or scenic value" be conducted in a way that provides "maximum protection." It specifically identifies

the Teshekpuk Lake and Utukok River areas for this protection. Alternative D clearly violates this.

- Alternative B is purportedly a more conservation alternative than the No Action Alternative, Alternative A (2013 IAP status quo), with slightly less land available for development and more land closed to new infrastructure. However...
  - Eliminating some of the southern boundary of the Teshekpuk Lake Special Area removes protections for areas used by the Teshekpuk Lake Caribou herd during fall and winter.
  - A large portion of the area added in Alt B as closed to fluid mineral leasing in the southeast Teshekpuk Lake Special Area is *already leased*.
  - A substantial portion of the area added in Alt B as closed to fluid mineral leasing in the southwest Teshekpuk Lake Special Area was just sold in the December 11, 2019 lease sale.
  - A vast majority of the area set aside under Alt B as Lease deferral around Nuiqsut (no leasing for at least 10 years) is already leased.
  - And, as stated in the Draft IAP, “If an alternative would close an area to leasing that is already leased the existing leases could continue to be developed or renewed; however, if the leases were to expire, the tracts would not be available for re-lease.” This effectively deems the protections of Alt B useless for areas under consideration that are already leased.
  - This Alternative also allows for 2 north-south pipeline corridors through the Teshekpuk Lake Special Area to transport oil and gas from offshore leases to TAPS through areas otherwise closed to new infrastructure. Yet locations of such corridors will be decided at a later date and subsequent NEPA analysis, not in this current document. Allowing impactful infrastructure before allowing for adequate assessment of impacts is irresponsible.
- BLM failed to consider a full range of reasonable alternatives by not analyzing a truly environmentally protective alternative that adequately addresses and accounts for impacts of and contributions to climate change.
  - Even under the existing IAP, there are unacceptable impacts to our climate, animals, water, land, and people, due to the rapid increase of oil activities in the Reserve. BLM should consider a more protective alternative.
  - Alaska has warmed at a rate more than twice that of the rest of the US over the past 60 years. This is already causing, and will continue to cause, sea-level rise, sea-ice loss, coastal erosion, ocean warming and acidification, changes in river dynamics, and permafrost thaw.
  - Expanding oil and gas production in the Reserve contradicts scientific and international consensus that we must act immediately to address climate change and rapidly transition away from fossil fuel use. The DEIS fails to consider any alternative that would halt or significantly limit leasing, and ultimately, production.
  - If we are to avoid climate catastrophe, new fossil fuel production and infrastructure must be halted, and most existing production must be phased out.

A 2015 study determined that “all Arctic [oil and gas] resources should be classified as unburnable,” because “development of [oil and gas] resources in the Arctic . . . [is] incommensurate with efforts to limit average global warming to 2 °C.” [C. McGlade & P. Ekins, The geographical distribution of fossil fuels unused when limiting global warming to 2°C, 517 NATURE 187, 187, 190 (2015)].

- BLM has not fully considered the cumulative impacts of further development in the western Arctic, or how to address those impacts.
  - GMT1 and GMT2 have just been completed, and more studies are needed before BLM and other permitting agencies can understand the extent the impacts of development are having on this area. ConocoPhillips is also moving forward with the massive new Willow project, which would include 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, potentially, a temporary gravel island in Harrison Bay.
  - In GMT1, BLM determined a single drill pad would significantly impact Nuiqsut’s subsistence uses. Development has only expanded since that finding in 2014.
  - ConocoPhillips continues to push west in the NPR-A at a time when the Administration is considering opening new areas of the Arctic to oil and gas, making it difficult for the public to determine how these processes are working in tandem.
  - BLM recently completed the comment period on the draft Master Development Plan and EIS for the Willow Project. Significant questions were raised regarding impacts that could profoundly affect subsistence, human health, and other values in the Teshekpuk Lake Special Area. Impacts from this massive project must be fully vetted and addressed before revising the management plan for the NPR-A.
  
- All action alternatives propose opening additional areas in the Teshekpuk Lake Special Area to oil and gas leasing and industrial activity, and all eliminate the Colville River Special Area. BLM should instead strengthen protections for these special areas, not undermine or erase them from the map.
  - Teshekpuk Lake Special Area is one of the most productive wetland complexes in the Arctic and an important calving ground for the Teshekpuk Lake Caribou Herd. It is also an important food resource for communities on the North Slope.
  - The Colville River Special Area provides important nesting habitat for numerous raptors, including peregrine falcons, rough-legged hawks, and gyrfalcons, and is also an important traditional use area for the community of Nuiqsut.
  - These areas were set aside because of their importance to wildlife. BLM’s rush to open these important areas to oil and gas activities cuts against its obligation to provide maximum protections for key areas in the Reserve. BLM should protect these areas — not open them up to further industrial activity.
  
- In the midst of a climate crisis, the Arctic faces plenty of threats without this attempt to open additional areas to oil and gas. This is not the time to throw out science-based land management to allow for more oil development in sensitive areas.

- The NPR-A is home to the Western Arctic and Teshekpuk Caribou Herds, which are key subsistence resources to numerous communities in the Reserve and across northwest Alaska. Areas like Teshekpuk Lake and the Utukok River Uplands Special Area provide important habitat for these herds and other species. BLM should not open additional areas to development.
- BLM is rushing this process and not providing adequate time for meaningful participation by the people and communities most affected by the project, particularly since the comment period overlapped the holiday season.
  - A coalition of Environmental and Indigenous groups submitted a letter requesting BLM extend the comment period by 60 days to ensure meaningful participation by local communities and others. The letter respectfully requested a reply by December 13<sup>th</sup>. BLM failed to reply by that date and, two weeks later, indicated they will not extend the comment period.
  - Others, including the Native Village of Nuiqsut, North Slope Borough, and the Western Arctic Caribou Herd Working Group made similar requests.
  - A management plan of this breadth and scope requires careful, thoughtful consideration and sufficient time for community engagement. BLM failed to honor numerous well-justified requests for a longer comment period.
- The Indigenous Peoples who live in the Western Arctic, and whose families have lived in and moved through this region for thousands of years, rely on its animals, lands and waterways for their food, health, culture, and way of life. Any disruption that jeopardizes the ecosystem's health puts all of its inhabitants at risk.
  - BLM's analysis determined that past, present, and reasonably foreseeable future activities, combined with infrastructure development and oil and gas activities would increase impacts on abundance and availability of subsistence resources and user access, and lead to increased competition, costs and time, and cultural impacts. Areas available for subsistence use would decrease over time with increasing infrastructure and human activity in traditional use areas. Nuiqsut and Utqiagvik would be most impacted.
  - Reduced harvests and access to traditional lands and foods will impact food security and community and cultural wellbeing.
  - Climate change will exacerbate these impacts, a finding also noted by BLM.