



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
Alaska State Office
222 West Seventh Avenue, #13
Anchorage, Alaska 99513-7504
www.blm.gov/alaska

In Reply Refer To:
6841 (AK-930)

SENT VIA EMAIL

Mr. Greg Balogh
ESA Branch Chief, NOAA Fisheries
222 West 7th Ave
Anchorage, Alaska 99513

Subject: Revised Willow Master Development Plan

Dear Mr. Balogh:

The Bureau of Land Management (BLM) is providing an update to the Endangered Species Act (ESA) Section 7 consultation for the Willow Master Development Plan (Willow Project). The Willow Project Record of Decision (October 2020) was remanded back to BLM by the U.S. District Court Alaska (Court) to address Court identified deficiencies with the previously produced Environmental Impact Statement (EIS). In response to the Court's decision, BLM is completing a Supplemental EIS to address the identified deficiencies. In development of the Draft Supplemental EIS (July 2022), BLM has developed a new alternative that has been identified as the Project's preferred alternative (Alternative E and Option 3).

Changes in the revised Project are primarily focused on the terrestrial environment, with a focus on the Teshekpuk Lake Special Area. The revised Project will construct one less drill site (eliminating the previous drill site Bear Tooth 4), relocate one drill site (Bear Tooth 5) and eliminate the previously proposed constructed freshwater reservoir. In the marine environment, the only Project change is the relocation of the sealift barge lightering area, which has been relocated slightly to the south to avoid recently designated ringed seal critical habitat. There are no changes to the planned lightering operations or the size of the screeding area. A full description of the preferred alternative can be found in the Willow Master Development Plan Supplemental EIS (Alternative E and Option 3).¹

Due to the new alternative, the BLM is submitting the enclosed updated Biological Assessment (BA) for the Willow Master Development Plan project (the Project), as proposed by

¹ <https://eplanning.blm.gov/eplanning-ui/project/109410/510>

ConocoPhillips Alaska, Inc. In addition to the new Project alternative, the revised BA addresses the recently designated critical habitats for bearded seals, ringed seals, and humpback whales. These critical habitat designations were not in place during BLM's previous consultation with the National Marine Fisheries Service (NMFS). BLM previously submitted a BA on May 8, 2020, and NMFS issued its letter of concurrence on July 15, 2020.

Despite the changes to both the Project preferred alternative and additional evaluation for recently designated critical habitat, the BLM has made no changes to the impact determination for listed species for this project. With this revised submission, BLM requests NMFS concurrence that the proposed activities will "likely affect, but not likely to adversely affect" humpback whales, ringed seals, and bearded seals and will have no adverse modification on critical habitat for these species.

Please contact Carrie Cecil, Willow Master Development Plan Project Lead at (907) 205-7801 or ccecil@blm.gov with any questions or additional information requests.

Sincerely,

Kevin J. Pendergast
Deputy State Director, Resources
BLM Alaska

cc: Shelly Jones, njones@blm.gov
Bonnie Easley-Appleyard, bonnie.easley-appleyard@noaa.gov

Attachments: Updated Biological Assessment