

From: [Cecil, Carrie H](#)
To: [Ott, Kaithryn](#); [Conn, Sarah SC](#)
Cc: [Perham, Craig J](#); [Pendergast, Kevin J](#); [Gieryc, Michael S](#); [Routhier, Michael P](#)
Subject: Willow MDP Supplemental EIS Section 7: Request for Input
Date: Tuesday, January 10, 2023 3:31:01 PM
Attachments: [20230110_Memo_WillowMDP_GHGemissions_ESASection7.pdf](#)
[2022-08-29 -- CBD Willow SDEIS Comments.pdf](#)

Hello Kaiti and Sarah,

During the public comment period for the Willow Master Development Plan (MDP) Draft Supplemental EIS, the BLM received a comment letter (see attached) from the Center Biological Diversity (CBD) concerning the BLM's obligation under Section 7 of the Endangered Species Act to consult with the United States Fish and Wildlife Service prior to authorizing major construction projects to ensure that federally authorized actions are not likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of their critical habitat.

In this letter, CBD argues:

“Oil and gas activity under Willow, if conducted, may affect hundreds of threatened and endangered species and their critical habitats due to the resulting increase in carbon emissions. BLM must therefore consult under the ESA prior to permitting oil and gas activity in the area.” (pg. 22).

In accordance with its obligations under Section 7, the BLM prepared a Biological Assessment (BA) to evaluate the potential effects of the Willow MDP project on listed and proposed species and their critical habitat. In this BA, the BLM defined the action area for the Willow MDP to include all areas directly or indirectly affected by the Proposed Action up to the point where there are no measurable effects from project activities that are reasonably certain to occur. In the course of its evaluation, the BLM found that the Proposed Project “may affect” four threatened species within the action area (i.e., polar bear, northern sea otter, spectacled eider, and Steller's eider). The BLM transmitted this BA to you on August 31, 2022, thereby initiating formal consultation.

In consideration of CBD's comment, the BLM has further evaluated whether the impacts from GHG emissions, such as reductions in sea ice extent, would change our analysis conclusion and alter the approval of the Willow MDP by: (1) identifying if the GHG emissions that would result from the proposed action would cause effects to ESA-listed species or their designated critical habitat in locations beyond the Action Area as currently described; (2) identifying any additional effects within the Action Area to listed species, such as polar bears and ice seals, or to their designated critical habitat, such that an expansion of the ESA BA's effects analysis could be warranted; and/or (3) identifying effects to any additional listed species or designated critical habitat not currently included in the ongoing formal consultations.

The BLM's evaluation and findings are summarized in the attached Memorandum to the File. In review of this Memorandum, the BLM respectfully requests your input on the appropriateness of the scope of our ESA Section 7 Consultation in respect to GHG emissions

from the Willow MDP project.

Please let me or Craig Perham know if you have any questions, comments, or concerns.

Regards,
Carrie Cecil

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