

From: FOIA, BLM_AK <BLM_AK_FOIA@blm.gov>

Sent: Tuesday, September 19, 2023 11:08 AM

To: Jeff Ruch <jruch@peer.org>

Subject: Re: [EXTERNAL] RE: FOIA-Request DOI-BLM-2023-004543 - Interim Response

Good Morning Mr. Ruch,

Thank you for your status inquiry to DOI-BLM-2023-004543. We are currently working on your request and after a thorough search of records our subject matter experts have provided the following preliminary responses to your bullet points (responses are in bold):

1. Any analysis of climate change-induced threats to TAPS operation, including, but not limited to, permafrost thaw, substrate subsidence, frost heaves, river scouring/channel changes, channel icing, glacial outbursts, flood events, slope instability, etc., and potential impacts on pipeline integrity;

BLM Alaska has several thousand records related to the keywords you provided, however, none of these keywords occur in relation to the "analysis" of climate change-induced threats to the TAPS operation.

2. Any assessment of increased or altered maintenance costs or pressures upon TAPS due to climate change;

APSC does not release maintenance costs to the government. BLM Alaska is not aware of any assessments concerning climate change.

3. Any report concerning climate change-induced damage incurred on and/or added repair or maintenance costs for TAPS facilities;

APSC does not release maintenance costs to the government. For the purposes of releasing reports, please further refine the definition of "climate change-induced damage".

4. Any records discussing climate change impacts in marine ecosystems along the transit routes of TAPS vessels (e.g. marine heat waves, marine population declines, etc.), and records discussing how such marine climate change impacts may affect ecological impacts of oil spills from TAPS vessels in Prince William Sound and the Gulf of Alaska;

BLM Alaska does not have records on climate change impacts in marine ecosystems. The BLM does not monitor marine ecosystems. You would need to contact NOAA for this information.

5. Any planning document outlining potential steps to mitigate or prevent climate-related impacts over the projected future lifetime of the system;

APSC has not shared planning documents with the government concerning climate change over the projected future lifetime of the system.

6. Any documents discussing the Dismantling, Removal, and Restoration (DR&R) obligation of TAPS, and anticipated impacts of climate change on such;

We have over 20,000 records on DR&R. We estimate approximately 600-700 hours of labor to search and review, these records, and to save to the FOIA share site for categorization and solicitor review for exemptions. Consideration will need to be given for data storage to accommodate and transfer these records.

7. Any discussion by TAPS owners regarding climate change impacts to the system;

BLM Alaska has not discussed climate impacts or footprint with the owner companies.

8. Any estimate or discussion of the climate impacts or climate footprint of TAPS operations; and

BLM Alaska has not discussed or estimated the climate impact of TAPS.

9. Any decision documents and supporting materials concerning decisions since 2002 not to conduct a new EIS or supplemental EIS.

There have been no decisions since 2002 concerning a new or supplemental EIS for the TAPS ROW.

Due to the volume of records, labor hours, and data storage involved with this request we may need a waiver consideration. We are respectfully asking that you narrow the scope of your request based on our SME's review and responses to indicate that although we have records that include the search terms you provided there is no analysis of climate change related damage to TAPS.

Please let us know if you have additional questions regarding this matter. Thank you.

Sincerely,
Shaina

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