

United States Senate

WASHINGTON, DC 20510

April 1, 2015

The Honorable Sally Jewell
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Jewell:

We are writing to urge you to ensure that when the Department proposes updated air permitting regulations for offshore drilling activities in Alaska's coastal waters, the Department solicits information on both the potential climate impact of black carbon pollution and the availability of black carbon pollution control technologies.

In 2012, Congress passed the Consolidated Appropriations Act, which transferred jurisdiction over air quality standards for offshore drilling in Alaska's coastal waters from the Environmental Protection Agency to the Department of Interior (DOI). At the time, concerns were raised regarding deficiencies in DOI's approach to overseeing air pollution from offshore drilling. We are pleased that the Department recognized those deficiencies and is undertaking efforts to update its air quality standards.

The Arctic has unique characteristics and vulnerabilities. Black carbon pollution, or soot, a type of particulate matter that results from the incomplete combustion of fossil fuels, is a significant contributor to global warming. The Arctic is especially sensitive to black carbon pollution. When it covers highly reflective snow and ice, the darker surface absorbs more heat, accelerating the melting of snow, glaciers, ice sheets, and sea ice.

The Arctic is warming twice as fast as the rest of the planet. Arctic sea ice volume has shrunk by 75 percent since the 1980s, and a recent study suggests that black carbon may be responsible for more than 30 percent of recent warming in the Arctic. The National Snow and Ice Data Center recently announced that the sea ice extent maximum in the Arctic likely reached a record low this year. Increased loss of snow and sea ice in the Arctic could have severe impacts, including accelerating warming as reflective sea ice melts into dark ocean waters that absorb more heat, exposing Alaska's coastal communities to fierce storm surges, sea-level rise and erosion, and undermining subsistence hunting of Alaska Natives. The consequences of a melting Arctic stretch far beyond the region. Melting glaciers and the Greenland ice sheet are major drivers of global sea-level rise, leaving coastal and low-lying areas in the United States and around the world vulnerable to flooding.

Current DOI regulations for air emissions from outer continental shelf operations become less stringent the farther the source is from the shore. Yet this approach does not take into account the harmful effects of black carbon on snow and sea ice in the Arctic far from shore.

Unlike carbon dioxide, which becomes well-mixed in the atmosphere and has a global effect, black carbon pollution warms the atmosphere on a regional basis. Therefore, introducing new sources of black carbon pollution in the Arctic from ships and heavy equipment used to drill for oil and gas would add a new threat to the fragile Arctic. Thankfully, technologies exist to cost effectively reduce black carbon pollution from diesel engines. The United States is on track to reduce black carbon emissions by 52 percent from 2005 levels by 2030, largely because of existing diesel regulations. However, these technologies may not be used in offshore drilling, unless the Department requires them to be used.

We understand that the Department will soon propose new regulations to address air pollution from offshore drilling. In this proposal, we urge you to solicit public comment on two critically important questions. First, the Department should seek comment on whether our current understanding of the Arctic warrants a requirement that black carbon pollution be controlled due to its effects on ice, snow, and sea ice. Second, the Department should seek comment on whether there are controls, technologies or approaches that are available, or will be available, to control black carbon pollution from the ships and equipment associated with drilling for oil and gas. It is critically important that the Department use the opportunity of updating these standards to safeguard the Arctic and the global climate from harmful black carbon pollution.

Thank you for your consideration of this request.

Sincerely,



BRIAN SCHATZ
U.S. Senator



SHELDON WHITEHOUSE
U.S. Senator



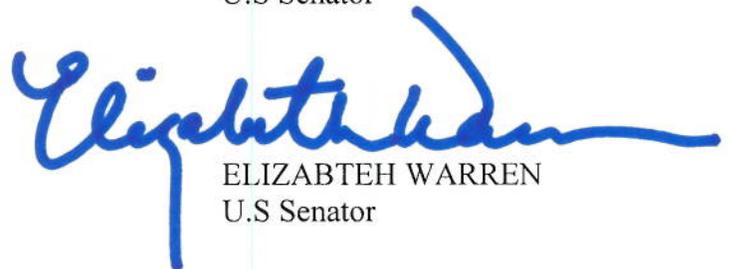
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