Comments - Emergency Meeting to determine if AIDEA can spend up to $20,000,000 on Lease Sales in the Arctic NWR. Dated 12/22/20

Oral Comments prepared but not delivered as they cut off comment period after 2.5 hours:

I provided written comments yesterday in opposition of the Resolution and would like to add to those now.

* Alaska is on the frontlines of climate change. Oil and fossil fuels have for years fueled our economy, but we can all see that evolving, as our society develops and invests in cleaner energy sources.
* Instead of spending 20 million dollars of our public funds on trying to prop up a project like this lease sale debacle, that even the oil companies and many major banking institutions do not support, I encourage AIDEA, to see where they can prop up the Alaskan owned small businesses, our service industry and renewable energy. These businesses provide the network that holds our communities together and have a direct effect on the quality of our lives.
* I urge you to vote no on Resolution G20-31, and yes to assisting our local businesses. I appreciate this opportunity to comment.

Written Comments submitted:

I am writing to oppose the approval of Resolution No G20-31 by the Alaska Industrial Development and Export Authority (AIDEA), for the reasons given below:

1. The use of public funds from the State of Alaska should not be used to bid alongside and possibly against private companies and interests. This appears to conflict with the firm conviction of “Free Market Enterprise,” by our State’s Leaders.

2. I object to the extremely short notice for this public comment period, less than 24 hours since the public announcement was posted in the Anchorage Daily News. The BLM issued the Notice of Sale on December 7, 2020 so there was adequate time to hold a public meeting with a longer public comment period. This appears to be a poorly planned last ditch effort, based on a fear that perhaps no private companies will bid on the lease sale options.

3. Perhaps the lack of interested bidders is due to concerns about: Climate change, the fragile habitat in the Arctic Coastal Plain, rights of Indigenous peoples, how development could adversely effect the biodiversity in the Refuge and the low price of oil and high cost of extraction. Perhaps investors and companies have taken notice that domestic and international banks will not fund projects in the Arctic. Insurance companies and asset managers are also taking notice. If private investors do not want to take on this risk, why should the State of Alaska even consider it, when the State’s budget is in shortfall and the State’s economy, based primarily on oil revenues is struggling. Why would AIDEA invest funds in this high risk endeavor when private companies will not?

4. The WHEREAS in the proposed resolution that references AS 44.88.830 leaves out key wording, that appears to contradict the wording and meaning implied in this resolution. See below for the full text:

Sec. 44.88.830. Qualified infrastructure development; powers and duties of the authority.

 (a) Subject to the limitations of [AS 44.88.840](http://www.akleg.gov/basis/statutes.asp#44.88.840), for Arctic infrastructure development, the authority may

     (1) use the Arctic infrastructure development fund ([AS 44.88.810](http://www.akleg.gov/basis/statutes.asp#44.88.810)) to finance Arctic infrastructure development, insure project obligations, guarantee loans or bonds, and establish reserves;

     (2) acquire real or personal property by purchase, transfer, or foreclosure when the acquisition is necessary to protect the authority's interest in financing;

     (3) defer principal payments or capitalize interest on Arctic infrastructure development;

     (4) subject to [AS 36.30.085](http://www.akleg.gov/basis/statutes.asp#36.30.085)(e), enter into lease agreements, sales-lease-back agreements, build-operate-transfer and operate-transfer agreements, or any similar project financing agreement for a qualified Arctic infrastructure development;

     (5) enter into agreements with government entities for the transfer and control of infrastructure, facilities, rights-of-way, and studies;

     (6) contract for services with a professional advisor, including an attorney, bond counsel, engineer, or other technical expert necessary to fulfill the purposes of the program; and

     (7) subject to [AS 44.88.090](http://www.akleg.gov/basis/statutes.asp#44.88.090), borrow money and issue bonds.

 (b) The authority shall adopt regulations to implement [AS 44.88.800](http://www.akleg.gov/basis/statutes.asp#44.88.800) — 44.88.840, including

     (1) a process for acquiring financing under this section;

     (2) qualifications for Arctic infrastructure development projects applying for financing under this section; and

     (3) fiscal controls and accounting procedures for the fund.

5. Furthermore, AS44.88.830 references AS 36.30.085(e) which appears to state that this action would need to be approved by the "legislature by law.” See below for the full text:

Sec. 36.30.085. Lease-purchase agreements.

 (e) The department, the Board of Regents, the legislative council, or the supreme court may not enter into a lease-purchase agreement to acquire or improve real property unless the agreement has been approved by the legislature by law.

I appreciate the opportunity to provide comments on this hastily conceived Resolution. I will be calling in to provide comment tomorrow during the public comment period.

Sincerely,

Kathleen M. O’Reilly-Doyle

Alaska Soles - Great Old Broads for Wilderness

Anchorage, Alaska