

**From:** REDACTED  
**To:** [Gamper, Merry E](#)  
**Cc:** [Nedd, Michael D](#)  
**Subject:** Potential Recusals  
**Date:** Wednesday, February 24, 2021 2:22:00 PM  
**Attachments:** [Potential Recusals for Nada Culver.docx](#)  
**Importance:** High

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Hi Merry,

This morning I spoke with Mike Nedd regarding potential recusals for Nada Culver and he asked me to compile a list and send to you. Please see attached list.

## Potential Alaska-related Recusals for Nada Culver, as BLM Deputy Director

### Potential Recusals for Nada Culver, who is beginning employment with BLM as Deputy Director (exercising the authority as BLM Director),

- National Audubon Society, Vice President, Public Lands & Senior Policy Counsel (Tenure: May 2019 to present)
- Wilderness Society, Senior Counsel/Senior Director (Tenure: Oct 2003 – May 2019)

### Items related to and Culver's past employment history:

#### Lawsuits:

- ANWR Coastal Plain FEIS ( *The Wilderness Society*; *National Audubon Society* 3:20-cv-205 & 206,)
  - Gwich'in Steering Committee v. Bernhardt
  - State of Washington v. Bernhardt
  - Native Village of Venetie Tribal Government v. Bernhardt
- NPRA IAP
  - N. Alaska Env'tl. Ctr., et al. v. Bernhardt, et al., (*The Wilderness Society* 3:20-cv-207)
  - National Audubon Society et al. v. de la Vega et al., (*National Audubon Society*)
- ConocoPhillips Willow Project
  - Sovereign Inupiat for a Living Arctic v. Bureau of Land Management (*The Wilderness Society* 3:20-cv-290)
- USFWS – Izembek Land Exchange (BLM Survey nexus)
  - Friends of Alaska National Wildlife Refuge v. Bernhardt; (*Wilderness Soc and Audubon Society* 3:18-cv-29)
- Ambler Road
  - NAEC v. Bernhardt 3:20-cv-187 (*National Audubon Soc.*)

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FOIA request (for CY2018-2021): HQ (as well as the Department) will have a list of FOIA actions related to this request. However, the following identifies Alaska-related FOIA items responsive to this data ask.

FOIA #	Requester Name	Organization	Subject	Subject Matter Request	Date Filed	Open/ Closed/ Completed
BLM-2021-002230	Dawson, Natalie	Audubon	Submerged Lands (Cooperative Management Agreement (CMA))	<ol style="list-style-type: none"> <li>1. Records and documents related to "MOU for submerged lands and waters in and adjacent to federal public lands in Alaska"</li> <li>2. Any and all correspondence related to the topic "MOU for submerged lands and waters in and adjacent to federal public lands in Alaska" between US BLM, US FWS, US NPS and State of Alaska Dept. of Fish and Game and Dept. of Natural Resources and Alaska Governor Mike Dunleavy.</li> <li>3. Any and all correspondence from BLM involving the following parties or their staff: Senator Lisa Ann Murkowski, Senator Daniel Sullivan, and Representative Donald Young regarding the "MOU for submerged lands and waters in and adjacent to federal public lands in Alaska."</li> </ol>	2/3/2021	Open
BLM-2021-002228	Dawson, Natalie	Audubon	Public Land Orders	<ol style="list-style-type: none"> <li>1. Any and all documents related to Public Land Orders in the following BLM planning regions: Bering Sea Western Interior, Bay, East Alaska, Eastern Interior, Ring of Fire, Kobuk Seward Peninsula, and Central Yukon. We request records for the timeframe of August 1, 2020, up to and including the date this records search is conducted.</li> <li>2. Any and all correspondence related to the topic those Public Land Orders listed above between US BLM, US FWS, US NPS and State of Alaska Dept. of Fish and Game and Dept. of Natural Resources and Alaska Governor Mike Dunleavy.</li> <li>3. Any and all correspondence between BLM and the following parties or their staff: Senator Lisa Ann Murkowski, Senator Daniel Sullivan, and Representative Donald Young regarding those Public Land Orders listed above.</li> </ol>	2/3/2021	Open
BLM-2021-001739	Rigonan, Robert	TWS	Coastal Plain	The Wilderness Society (TWS) requests a complete list of the full names of the parties who submitted bids to the Bureau of Land Management (BLM) Oil and Gas Lease Sale for parcels in the Coastal Plain Alaska held on January 6, 2021.	1/11/2021	Complete
BLM-2021-001273	Robert Rigonan	TWS	Coastal Plain	Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. §552-552a, The Wilderness Society (TWS) requests any and all correspondence related to the Call for Nominations and	12/15/2020	Open

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				<p>Notice of Lease Sale for the oil and gas leasing program on the Coastal Plain of the Arctic National Wildlife Refuge housed in the BLM Alaska State Office. Our request includes, but is not limited to, correspondences to and from BLM Alaska State Director Chad Padgett. We request that you use a timeframe for the search of August 21, 2020, up through and including the date of the search.</p>		
BLM-2019-00965	Hanceford, Phil	TWS	BSWI	<p>All records and all correspondence, including but not limited to letters, texts, emails, faxes, memoranda, briefing papers, and meeting notes, to or from BLM officials since January 2017 up through and including the date of the search relating to BLM's NEPA process and development of the BSWI Draft RMP/EIS. This request shall include all draft versions, including any partial drafts or document sections, of the BSWI Draft RMP/EIS prior to its March 11, 2019 release for public comment. This request shall also include records and correspondence with or between cooperating agencies, such as the U.S. Fish &amp; Wildlife Service, Alaska Department of Fish and Game and all tribes and tribal entities. Finally, this request applies to all Alaska BLM offices, including the Alaska BLM State Office, the Anchorage District office, and the Bering Sea-Western Interior Field Office, and shall include records and correspondence with or between not just these Alaska-based BLM offices but also BLM headquarters in Washington, D.C. This request also specifically includes all proposed tribal alternatives not incorporated into the BSWI Draft RMP/EIS.</p>	7/18/2019	Open
BLM-2018-00695	Morrissey, Matthew	TWS	Coastal Plain	<p>Any documents related to the development of an oil and gas program on the Coastal Plain of the Arctic National Wildlife Refuge pursuant to Title II of Public Law 115-97, including policies, plans, technical or scientific documents, regulations or regulatory documents, National Environmental Policy Act documents, assessments, and any documents related to the subject matter of the law.</p> <ul style="list-style-type: none"> <li>• Any documents related to the development of lands owned by the Kaktovik Inupiat Corporation and the Arctic Slope Regional Corporation within the Arctic National Wildlife Refuge.</li> </ul>	5/23/2018	Open

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Participants in this data call

- Alaska Regional Solicitor, Anchorage, Alaska (Unified Region 11) and Staff reviewed current litigation – COMPLETED.
- AK FOIA office identified responsive AK FOIA, from the last 3 years at a minimum- COMPLETED
  - Note: HQ and DOI should also have this data, but we provided AK-responsive items.