



CoastalPlain\_EIS, BLM\_AK &lt;blm\_ak\_coastalplain\_eis@blm.gov&gt;

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**[EXTERNAL] comments for the Coastal Plain Oil and Gas Leasing EIS scoping period**1 message

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**Dave & Dawn** <schiroadams@gmail.com>

Tue, Jun 19, 2018 at 8:24 AM

To: blm\_ak\_coastalplain\_EIS@blm.gov

To the BLM:

I am a citizen of Alaska and a voter writing to express my extreme opposition to the proposed opening of the Arctic Wildlife Refuge to oil and gas development. I understand the need for energy independence and the benefits that responsible energy development can bring, this is the wrong place for it.

The Arctic Refuge is an unmatched wild place that was set aside for a reason. It provides critical habitat for caribou, migratory birds, denning polar bears and many endangered species; it is a treasured area for human recreation and refuge; and it is a homeland and an essential subsistence resource for Gwich'in people and other Northern indigenous tribes and nations.

Oil and gas leasing, exploration, and development are not compatible with the purposes of the refuge. The Arctic Refuge is the only refuge established specifically "for the purpose of preserving unique wildlife, wilderness, and recreational values." The recently added refuge purpose in the December 2017 Tax Bill (PL 115-97) is not compatible with the four original purposes. The draft EIS must explain how the USFWS and BLM will address this and ensure that the first four purposes are not diminished or otherwise compromised by an oil and gas program on the coastal plain. The US Fish and Wildlife Service should prepare a compatibility determination as part of BLM's development of the oil and gas program. Oil and gas exploration and development are not permitted under the current Arctic National Wildlife Refuge Comprehensive Conservation Plan (CCP). Developing an oil and gas plan on the coastal plain and drafting a leasing EIS, the BLM must adhere to stipulations and requirements of relevant federal laws, such as ANILCA, the National Wildlife Refuge Administration Act, the Endangered Species Act, the Wilderness Act, the Wild and Scenic Rivers Act, the Clean Water Act, the Clean Air Act, and international treaties.

The tax bill passed in December (PL 115-97) "limits surface development to 2,000 acres for production and support facilities, which need not be concentrated in a single area". This 2,000 acres footprint is often compared to a "postage stamp", a dot on the tip of a nose, the size of an airport. Yet, this somewhat arbitrary number was borne out of a hearing on the Refuge in 1995 when a former BP official stated, "If today an oil field was built on the coastal plain — a series of oil fields, you would not occupy more than 2,000 acres of footprint. And in the future you can bet your boots it's going to be reduced even more." However, these 2,000 acres may not be one contiguous spot; they could be spread throughout the coastal plain relative to locations of desired oil prospects. BLM must identify all production and support facilities that would be included in this limitation and explain how it will be implemented and enforced. Alternatives and analyses must include all possible site scenarios for the 2,000 acres limit across the entire coastal plain, including analyses specific to each potential 400,000 acre lease sale. It is disingenuous to refer to it as a "postage stamp" when the true effects could be so much larger when considered from the point of view of the Porcupine Herd or the polar bear. Production and transportation would have a huge footprint, in the form of pipelines, roads, work camps, drilling rigs, and increased traffic, noise and waste.

Such impact has countless effects. Breeding caribou and females with young will be forced to relocate to avoid infrastructure; they are notoriously skittish and are already pinched in the narrow coastal plain.

We are at a time in history where further oil production is irresponsible; the Arctic is currently warming at twice the rate of most other parts of the planet.

For all of these reasons and countless others detailed by other citizens during this process, I urge you to listen to the US Fish and Wildlife Service, who, after an extensive analysis, recommended in 2015 wilderness protection for the coastal plain to Congress. We entered a 1987 treaty with Canada to

protect the Porcupine Caribou Herd. I urge the BLM to coordinate with the Canadian government and indigenous nations to meet this treaty's requirements and other international polar bear treaties and agreements.

This lease sale will have major impacts on wildlife, the Gwich'in people, and all those across the world with connections to the Arctic Refuge, whether because of ancestral ties, familiarity with the region through work or recreation, or because it represents a part of this world that transcends humans' importance and scale. Wilderness has value whether we ever visit it or not. Please take seriously the public outcry of we citizens who are pleading with you to reconsider development of this priceless and irreplaceable area.

Sincerely,

Dawn Adams

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