



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] Coast Plain EIS Scoping Comment Letter

1 message

David Fuller <ddf7001@humboldt.edu>

Thu, Jun 7, 2018 at 8:35 PM

To: blm_ak_coastalplain_EIS@blm.gov

Hello EIS Team — please see the attached pdf document containing my scoping comments. Thank you!



Coastal Plain Comment Letter.pdf

42K

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Dear Coastal Plain EIS Team:

First of all, thank you for reading my comments. Somebody has to do it and I hope you are being paid well for your hard work.

My first concern is the rushed schedule that this NEPA process is using. I realize that Secretarial Order 3355 and related direction to the Department of the Interior mandates such a rushed schedule --- but that does not make it right. This EIS should be exempt from these requirements. A project such as this, that has generated a high level of controversy for decades, should be done carefully and thoughtfully. The NEPA process should make time to carefully consider public input. The development of alternatives needs to be considered carefully, take into account all of the latest information, carefully analyze that information, and fully utilize the interdisciplinary NEPA process. This process takes time – it cannot be done via computers, it has to be done through many hours of well-considered and informed discussions among experts from a variety of fields. The NEPA process is often iterative in nature. Iterative takes a lot of time. The EIS must thoroughly detail the environmental and social effects of each alternative. The schedule that was published on the BLM internet site does not allow for such careful and thoughtful analysis to occur. The NEPA process for this highly controversial project should take a minimum of 4 years.

Related to the rushed NEPA schedule is the unfair treatment of Alaskan Natives who will bear the brunt of the impacts from any leases and attendant transport of materials to and from the Coastal Plain. It is well known that from May through October Alaskan Natives need to be engaged in subsistence activities. Having public scoping meetings in June is the worst time to gather input from Alaskan Natives. Having Draft EIS comments due in early fall will not allow Alaskan Natives to participate in this process either. This is clearly an Environmental Justice issue that could be dealt with through amending the rushed schedule and treating this high impact project with the proper level of attention to Alaskan Native needs and the potential impacts on these populations.

The location of any future leases is key to many of the impacts. Taking the time to figure out the least impact location will take consideration of a multitude of trade-offs. I am not an expert on the area and cannot offer any solutions except to say that the experts working on this EIS should be given the proper amount of time and resources to carefully develop a range of potential locations and examine trade-offs in impacts to all of these potentials.

In addition, I believe the EIS should use non-market economic analysis to quantify the Existence Value of 1.6 million acres of unspoiled coastal plain in one of the most unique places on Earth. Land set aside and protected for future generations. The impact of the proposed project on the Existence Value is to completely erase the Existence Value of the Arctic National Wildlife

Refuge, particularly the coastal plain area, for this and future generations. The NEPA analysis should display a comparison of a full range of potential revenue generated by the leases when developed to that of non-market values using new and realistic projections (see Perry and Alkire 2017; Kotchen and Burger 2007).

The complete contribution of these leases, when developed, to climate change must be fully disclosed in the EIS. The effects of climate change on the Coastal Plain area (rising temperatures, rising sea levels, loss of permafrost, changed weather patterns and subsequent effects on native wildlife and their behaviours) and need to be carefully analyzed and disclosed. The impacts to humans, wildlife, and ecosystems must be fully analyzed and disclosed.

The potential cumulative effects of all future leases mandated or allowed by the Tax Act must be fully analyzed and disclosed in this EIS.

The full and potential impacts of any leases and their impacts on soil, water, permafrost, air, biota, and ecosystems must be disclosed.

Thank you for considering my comments.

References

Kotchen, M.J. and N.E. Burger. 2007. Should we drill in the Arctic National Wildlife Refuge? An economic perspective. *Energy Policy* (35) 4720-4729.

Perry, A and C. Alkire. 2017. Arctic National Wildlife Refuge: Economics of potential oil development. Key-Log Economics for the Wilderness Society, November 1, 2017.
<https://wilderness.org/sites/default/files/1710%20Key%20Log%20Economics%20Arctic%20Refuge%20Report%202017Nov1%20%28003%29%20FINAL.pdf>