



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL]

1 message

John <jgussman@dcproductions.com>
To: blm_ak_coastalplain_EIS@blm.gov

Mon, Jun 4, 2018 at 8:28 AM

thank you



Scoping Letter.docx
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Karen Mouritsen, Acting State Director
Bureau of Land Management, Alaska
222 W 7th Avenue #13
Anchorage, AK 99513

2 June, 2018

Ms. Mouritsen,

Thank you for considering these comments on the proposed lease and drilling program in the Arctic National Wildlife Refuge. I am a retired civil servant who served 7 administrations beginning in 1979, including a period working for the Bureau of Land Management in Idaho and Oregon. I have a special appreciation for the multiple challenges faced by public land management employees like you and the team charged with the development of this Environmental Impact Statement.

I strongly oppose efforts to develop an oil and gas program in the Arctic National Wildlife Refuge. I have stood on the Arctic Plain. I have walked through the 1002 Area. Millions of us know and have commented to Interior Secretary Zinke that this is an incredibly special American treasure that for decades we have chosen NOT to develop. It is a complex, healthy ecosystem that cannot be replaced or restored. It is important to thousands of people who have lived sustainably as part of the Arctic landscape for centuries. The first choice, the responsible choice in an Environmental Impact Statement, is to continue NOT developing the Arctic National Wildlife Refuge. It is fully eligible for Wilderness designation and that option should be **completely** considered and evaluated in an EIS.

This administration has indicated an intent to expedite the review process and hold lease sales in 2019. I imagine you are aware how impossible a full analysis would be in that short amount of time. This rushed timeline is completely unacceptable. It will not allow for the needed analysis required under the law and which is necessary to meet the Department's obligations to responsibly steward one of the crown jewels of the nation's National Wildlife Refuge System.

The Department of the Interior must closely examine the science and fully evaluate the impacts of every stage of proposed energy development on the Refuge's wildlife, water, human subsistence, soil, historic, archaeologic, and botanic values for which it was created.

Energy development portends permanent harm to the Arctic Refuge's fragile environment. Scars on the tundra from heavy seismic equipment will remain visible decades if not centuries. Spills are inevitable and have especially grave consequences in the rich, productive Arctic Plain. Nesting birds, small mammals, and aquatic vertebrates and invertebrates are vulnerable to habitat fragmentation. The Porcupine Caribou Herd faces potential population-level impacts from roads and pipelines displacing the herd from calving grounds on the coastal plain. The long-term conservation of the many components of the very best, intact Arctic ecosystem in the U.S. will be significantly jeopardized by embarking on this oil and gas program in the Refuge.

The Notice of Intent for this project incorrectly states the area affected is 1.6 million acres. For example, measuring roads and drill pads against an arbitrarily limited number of acres is comparable to measuring a barbed wire fence in square inches of metal. The ecological effects are enormously larger, especially where some species travel from the Arctic Plain to 5 other continents.

Developing the Arctic Plain will exacerbate the effects of climate change globally. Direct, indirect, and synergistic effects of this proposed development are truly world-wide in scope and that analysis must be fully developed. The analysis should thoroughly assess the cumulative impacts of climate change when combined with the fragmentation of a place in America's Arctic that is currently free from the additional pressure of oil and gas development.

The 'no action' alternative is very important to this analysis and must be fully developed. Because of the huge positive value of the undeveloped Arctic Refuge, it only makes sense for this to be developed as a highly viable option for decision makers. This is very likely the best place to sequester these carbon resources in the ground by allowing them to remain there until a true energy emergency necessitates their removal (as described in the NPRA guidance – that this development proposal is required to follow). We are not at that juncture!

In the action alternatives, all impacts must be evaluated for their direct effects as well as those that will extend far beyond the footprint of any physical development. The analysis must include lease stipulations and best management practices that are commensurate with the premier quality of the Nation's best, most intact, most extensive National Wildlife Refuge. The Department must gather additional information for what is not yet known while considering all the issues identified during scoping. I am confident that an honest, thorough, complete analysis, including the detailed economic analysis needed, will clearly indicate why an oil and gas program does not belong in the Arctic National Wildlife Refuge.

Most Sincerely,

John Gussman
Sequim, Washington