



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

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**[EXTERNAL] Coastal Plain Oil and Gas Leasing Program EIS-testimony**

1 message

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**rada@pacriminstitute.org** <rada@pacriminstitute.org>

Fri, Jun 8, 2018 at 3:46 PM

To: "blm\_ak\_coastalplain\_EIS@blm.gov" &lt;blm\_ak\_coastalplain\_EIS@blm.gov&gt;

To: [blm\\_ak\\_coastalplain\\_EIS@blm.gov](mailto:blm_ak_coastalplain_EIS@blm.gov)

Thank you for the opportunity to provide comments on the Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement (EIS.)

I am writing in support of the EIS and the proposed resource development activities. My perspective comes from 25 years of living in Alaska and working in the public and private sectors of our state, primarily on environmental permitting, engineering design, and geospatial data projects. Energy production from the coastal plain has the potential to extend the useful life of the Trans-Alaska Pipeline System (TAPS) and provide needed economic security to our state and to our nation.

In reviewing documents shared by BLM during scoping, I believe it is important to note that the 2,000 acre area proposed for leasing is shared by multiple owners—federal, state, and Native entities—and serves multiple uses— surface, subsurface, conservation, traditional, among other. The area is disconnected from roads and from a pipeline system (e.g., TAPS.) Additionally, the area is yet to be explored with modern seismic technology and verified with exploration drilling results, both of which require safe and optimal access for camps and equipment throughout the area of interest.

My specific concern, is that this area, along with the rest of the state, is mapped only to mid-level topographic resolution (5 m). These data, while useful for general understanding and planning, are not sufficient for:

- Land delineation, boundaries, right of way management decisions
- Identification of cultural and environmental exclusion zones
- Determination of optimal access points given slope elevation, water body crossings, subsistence trails, vegetation concerns, and other considerations.
- Optimizing siting and routing decisions to limit disturbance to 2,000 acres

The EIS intends to review not only which areas to offer for lease, but also to inform post-lease activities, including seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain. This may also include sealift operations to bring fabricated modules and supplies to the site. Development of access alternatives and environmental stipulations pertaining to and actual execution of the aforementioned activities are best accomplished with the aid of high-resolution elevation data on land and in the coastal zone.

I encourage the EIS study team to conduct a geospatial data gap analysis as it relates to high-resolution topography and imagery over the entire lease area, as well as potential access corridors that will connect to existing road and production transportation infrastructure. This data gap analysis should also include bathymetry and cartographic charting data to support an understanding of marine transportation and coastal access alternatives.

Sincerely

Rada Khadjinova, PMP

6/11/2018

DEPARTMENT OF THE INTERIOR Mail - [EXTERNAL] Coastal Plain Oil and Gas Leasing Program EIS-testimony

Alaska resident, board member of the Alaska Resource Development Council