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[EXTERNAL] Coastal Plain Scoping

1 message

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To: blm_ak_coastalplain_EIS@blm.gov

Coastal Plain Oil and Gas Leasing Program EIS
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May 29, 2018

Dear BLM;

As I am sure you are aware, the task directed to the Bureau of Land Management (BLM) to undertake an Environmental Impact Statement (EIS) for the Arctic National Wildlife Refuge Coastal Plain Oil and Gas Leasing Program will be a daunting challenge. An EIS for a major project is usually a challenge under any circumstances. Numerous studies need to be completed and integrated into a concise document that passes scientific standards as well as public scrutiny. But with this proposed project, what is at stake will have wide ranging effect on competing economic incentives between oil/gas and renewable energy development, environmental impacts on one of the most pristine ecosystems in the world, and indigenous cultures that might be significantly changed. Furthermore, how all these things are measured can be elusive and subject to where one's values are. Much is at stake.

Given all these competing demands and conflicting measure, how does the BLM know when it has reached the point of having done a job that will be judged as being adequate and complete? Like most thing, the first step might be the most uncertain, but also a good indication of where things might be headed. The first step for BLM is to complete a scoping process that gets it right. Accordingly, I would like to suggest that getting it right, legally and scientifically, will be much dependent on using alternatives with the right time frame.

Many Alaskan politicians want to push for quicker studies, sooner lease sales, and money flowing into the state treasury at the earliest possible date. But, as the old adage goes haste makes waste. These politicians are essentially grasping for anything that will cover for their own inadequacies in dealing with Alaska's fiscal issues, and all the money that has been wasted on dreams and schemes instead of realistic progress. The more that BLM bends to these political pressures and gets diverted from an EIS based on defensible environmental, social, and economic analysis, the more likely it is that this effort will be just another failure. BLM may be obligated to include the "political" approach as an alternative, but you don't want to discredit the agency by using only expedited time frames. To get it right, you need to do be more inclusive and include long-term alternatives.

Accordingly, I would like to suggest that BLM's scoping process include a long-term scenario that is based on an assessment of energy needs, environmental conditions, and social change for the **next century**. This is a realistic planning timeframe for a project like this, and one that will better assure that the EIS does an adequate job in disclosing the consequences (intended and unintended) of the proposed project.

I would further like to suggest what some of the key assumptions should be;

1. Regardless of what percentage of oil and gas consumption is displaced by conservation and renewable sources of energy, within the next century there will still be societal need for oil and gas. But, because of competition from renewables, oil and gas will no longer be in command of the energy sector. In essence, there may be more supply of oil and gas than demand. If so, only those reserves that have the least project costs, least public subsidies, and least externalities (environmental and cultural impacts) should be favored. Given these criteria, where would oil and gas from the 1002 Area be ranked? This could be a significant factor in judging whether the 1002 Area reserves are feasible and, if so, when over the next 100 years.

2. Climate change can significantly and rapidly affect how oil and gas can safely be extracted from a permafrost environment. Assessing impacts that could occur from a long-term project of this scale based on current environmental conditions and relevant engineering standards can be totally misleading, both environmentally and economically. Project analysis needs to be based on conditions that best be expected when development might occur, not current conditions. Looking back with hindsight, the conditions that exist now (say for ice road construction) are nothing like the conditions that existed when 1002 Area development was first proposed.

3. Part of a comprehensive analysis of a project to extract oil and gas should be based on what happens environmentally and socially in the post-project stage. What impacts might be irreversible? For those that aren't might mitigation/restoration approaches might be used and what are their costs? How can these funding needed for mitigation/reclamation be assured when needed? If the 1002 Area is developed for oil and gas, the project will probably last decades. So, understanding post-project impacts might need to be based on a century time scale.

Thank you for the opportunity to comment.

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