



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**1 message

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**Robin Mann** <robinlmann@gmail.com>  
To: blm\_ak\_coastalplain\_EIS@blm.gov

Tue, Jun 19, 2018 at 7:30 AM

June 19, 2018

To: U.S. Department of the Interior Secretary Ryan Zinke

Attn: Coastal Plain Oil and Gas Leasing Program EIS

I am writing to express profound concerns about the Bureau of Land Management's proposed approach for preparation of the Environmental Impact Statement (EIS) for the Coastal Plain Oil and Gas Leasing Program. The BLM's planned approach is fundamentally inadequate, especially in light of the unparalleled environmental and cultural significance of the as yet untouched Coastal Plain of the Arctic Refuge. My principal concerns are as follows:

First, I strongly object to the recklessly collapsed timeframe the BLM is proposing to pursue. The tax bill did not exempt drilling in the Arctic Refuge from the full and complete Environmental Impact Assessment process. Given the complexity and scope of the issues that must be included in the environmental analysis and the amount of interagency coordination needed for that purpose, it is preposterous to suggest that a process satisfying NEPA can be conducted in a year's time. The BLM must put forward a revised schedule that meets the law and provides for the depth of analysis and interagency coordination required.

Secondly, BLM must also satisfy its obligation under NEPA to include consideration of a "no action alternative" in the EIS process. This is an obligatory component of the EIS; the requirement was not waived by the tax bill.

Third, the U.S. and Canada signed a bilateral agreement in 1987 to safeguard the transboundary habitat of the Porcupine herd, stretching from the Arctic Refuge through the Ivvavik National Park in the Yukon. The U.S. must meet its treaty obligations and consult with the Canadian government on the potential impacts to the herd from disturbing and industrializing the calving grounds in section 1002.

Of profound importance is the full and complete consideration of climate change factors associated with the leasing and drilling for oil and gas in the Coastal Plain. First, Alaskan communities and natural systems are already suffering climate change impacts, as the warming there is twice as fast as in the rest of the country. Effects already being witnessed and experienced are retreat of Arctic sea ice, shoreline erosion, the shrinking of glaciers, thawing of the permafrost, and increased incidence of insect outbreaks and wildfires. BLM must conduct a comprehensive examination of the potential added stresses from industrializing the Coastal Plain for oil and gas development, as well as the aggravating of climate pollution through the extraction and burning of the oil and gas deposits under the Coastal Plain.

In addition, the BLM must fully recognize and address the potential for leasing the Coastal Plain for oil and gas drilling to threaten the continued existence of the Gwich'in people and their subsistence way of life. Jeopardizing the continued existence of the Gwich'in people is a human rights issue.

6/21/2018

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

Sincerely,

Robin Mann

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