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[EXTERNAL] Public Scoping Comment - Coastal Plain Oil and Gas Leasing Program EIS

1 message

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To: blm_ak_coastalplain_EIS@blm.gov

Thu, May 24, 2018 at 8:32 PM

To Whom it May Concern,

Comments regarding: The Coastal Plain Oil and Gas Leasing Program

Thank you for the opportunity to comment during the public scoping period for the proposed leasing.

The analysis is important to Alaskan of various perspectives. I am a rural resident of interior Alaska. In the Alaska National Wildlife Refuge, I've hunted under state of Alaska subsistence hunting regulations and have camped, hiked and rafted on the north slope. It is a place unlike any other.

In the analysis of impacts from the proposed leasing, the following are among the issues deserving detailed analysis:

Habitat Connectivity

In addition to the infrastructure immediately adjacent to oil and gas wells, extensive systems of roads (and sometimes pipelines) are developed as well. As exemplified when flying over other places with oil and gas development (e.g. North Dakota), the connectivity of vegetation and associated wildlife habitat is altered, resulting in landscapes that appear like a patchwork quilt. The analysis should address the impacts to vegetation resulting from vegetation removal, introduction of impermeable surfaces, and the potential introduction of non-native species. The analysis should assess how these changes to wildlife (mammalian, avian, and fish) habitats may impact opportunities for all species who reside or migrate through the area.

Water sources and impacts to water quality

Large volumes of water are necessary for oil and gas development. The analysis should address the sources that will be used for water, including the winter months. Water quality stands to be impacted not only by the potential for spills and re-allocated uses of water, also by the introduction of impermeable surfaces such as roads and drilling pads. Beyond the permitting required for impacts to wetlands, the analysis of water impacts should consider the area-wide changes to the water table and water cycle.

Gravel sources and transport of materials

The environmental document should include the proposed locations for gravel extraction, the means and methods for transport, and the predicted miles of roads to be construction in addition to assessing the total number of acres that may be impacted. Will all sites be road accessible or will aircraft be a means of transport and access?

Permafrost and other impacts to soils

In addition to the growing body of research revealing the increasing rate of permafrost melt, exposure of melted soils via removal of tundra and other vegetation as occurs with development speeds the rate of melt, resulting in unstable grounds, new lakes, erosion, and carbon release. The analysis should consider the immediate and lasting cumulative impacts of impacting permafrost both locally and within the context of Arctic regions generally.

Cumulative Impacts

The analysis of cumulative impacts should be broad both temporally and spatially. New development in the Arctic would occur contemporaneously with melting sea ice, increased levels of certain globally-borne toxins, increasing levels of carbon in atmosphere, concerns about polar bear populations, in addition to changes to caribou herds and the physical landscape with implications for Alaska Natives and other rural residents (vegetation changes, subsidence, introduced species).

5/25/2018

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While the environmental analysis is not required to speak to the financial elements of the proposed project, readers of the analysis would benefit from a clearly defined purpose and need for the project in a place that is physically remote and environmentally sensitive at a time when oil and gas are not in short supply on the international stage.

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