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[EXTERNAL] Coastal Plain Oil and Gas Leasing EIS (DOI-BLM-AK-0000-2018-0002-EIS) Scoping Comment

Ben Nelson <benelson74@hotmail.com>

Tue, Jun 19, 2018 at 11:59 PM

To: "mnhayes@blm.gov" <mnhayes@blm.gov>

Cc: "blm_ak_coastalplain_eis@blm.gov" <blm_ak_coastalplain_eis@blm.gov>

Hi Ms. Hayes,

Attached are my scoping comments on the planned Coastal Plain Oil and Gas Leasing EIS.

Thank you,
Ben Nelson

Sacramento, CA



ANWR Coast Plain EIS - Ben Nelson 20180619.pdf

76K

19 June 2018

Via Electronic Mail Only

Subject: Scoping for the Coastal Plain Oil and Gas Leasing Environmental Impact Statement

Dear Ms. Hayes,

The purpose of this letter is to comment on the Bureau of Land Management (BLM) environmental impact statement (EIS) to implement oil and gas leasing in the Arctic National Wildlife Refuge Coastal Plain.

The EIS must sufficiently address, among other resources, impacts to the following:

- Wildlife
- Environmental Justice
- Climate Change
- Recreation
- Wild and Scenic Rivers

The Endangered Species Act (ESA) listed threatened Polar bear (*Ursus maritimus*) and its designated critical habitat, including onshore denning habitat are within the project area. The EIS must comport with, and address, several federal regulations and guidance, including: Marine Mammal Protection Act (MMPA), Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), Polar Bear Conservation Management Plan. In accordance with the Section 4(d) Final Rule (78 FR 11766) dated February 20, 2013, the Department of Interior relies primarily on the provisions of the MMPA. However, the rule does not in any way release BLM from responsibilities under Section 7 of ESA. Additionally, the 4(d) rule also states that agencies follow the regulatory framework and conservation programs identified in CITES.

The EIS must address impacts to the threatened Spectacled Eider (*Somateria fischeri*) and threatened Steller's Eider (*Polysticta stelleri*) in the project area according to the U.S. Fish and Wildlife Service's Information for Planning and Consultation (IPaC). Discussion of impacts to the Porcupine Caribou (*Rangifer tarandus granti*) herd must include migration routes and calving grounds and propose avoidance, minimization, and mitigation measures to address them.

The EIS must also address environmental justice concerns, including impacts to Alaska Natives and subsistence communities located in and near the project area. The project must protect tribal resources and engage in meaningful coordination and collaboration with Alaska Natives and sovereign communities.

The EIS must address climate change.

In addition to being consistent with applicable federal laws, the Purpose and Need should include maintaining the biological integrity, environmental health, and wildness of the refuge.

The project should also be consistent with the Service's Arctic Refuge Vision:

"This untamed arctic landscape continues to sustain the ecological diversity and special values that inspired the Refuge's establishment. Natural processes continue and traditional

cultures thrive with the seasons and changing times; physical and mental challenges test our bodies, minds and spirit; and we honor the land, the wildlife and the native people with respect and restraint. Through responsible stewardship this vast wilderness is passed on, undiminished, to future generations” (Service 2018).

In the Record of Decision (ROD) for the Revised Comprehensive Conservation Plan for the Arctic National Wildlife Refuge (signed April 3, 2015) the Service adopted Alternative E. Alternative E recommended designating the Coastal Plain (Section 1002) as wilderness and proposed “continued management of the 1002 area under Minimal Management standards” (Service 2015).

The reasonable range of alternatives should include:

- An alternative that minimizes impacts to listed species, including migration and habitat corridors. This alternative should limit the footprint of production and support facilities to a contiguous area of no more than 2,000 acres to avoid or minimize impacts outside of the project area.
- An alternative that limits the entire footprint to the western area outside of calving grounds and migration corridors for Porcupine caribou.

The Bureau of Land Management should work cooperatively with the U.S. Fish and Wildlife Service in accordance with 16 USC § 668dd(a) “for the benefit of present and future generations of Americans.” Ultimately, it seems oil and gas leases may be inconsistent with the characteristics for which the refuge was established, minimal management standards, and the Arctic Refuge Vision. Thank you for your work and consideration of my comments.

Sincerely,
Ben Nelson

"The Nation behaves well if it treats the natural resources as assets which it must turn over to the next generation increased, and not impaired, in value."

- Theodore Roosevelt

References

Service (U.S. Fish and Wildlife Service). 2015. Record of Decision (ROD) for the Revised Comprehensive Conservation Plan for the Arctic National Wildlife Refuge. April 3, 2015

Service. 2016. Polar Bear (*Ursus maritimus*) Conservation Management Plan, Final. U.S. Fish and Wildlife, Region 7, Anchorage, Alaska. 104 pp.

Service. 2018. Vision and Mission Statements: Arctic National Wildlife Refuge.

https://www.fws.gov/uploadedFiles/Region_7/NWRS/Zone_1/Arctic/PDF/ccp/ccpvisionp2011.pdf. Accessed June 19, 2018.