



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] BLM Comments

Inga Olson <olsoning@yahoo.com>

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

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I appreciate the opportunity to provide comments and they are attached in PDF format.

Patricia A. Olson "Inga"

**BLM Comments.pdf**

82K

Coastal Plain Oil and Gas Leasing Program EIS
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Anchorage, Alaska 99513

I am from California and we would not cut down our remaining Redwood Trees due to a lumber shortage. Similarly, harming the last great wilderness for a short-term gain seems more of a political decision than a rational decision that a wise person could make. I oppose oil and gas development on the ANWR coastal plain.

1. The issue of polar amplification is of great impact regarding oil and gas development in the arctic. The Arctic warms more than twice as fast as the rest of the planet due to the positive feedback loops that occur when ice and snow are lost.

a. **ARCTIC AMPLIFICATION:** We need to minify global warming not accelerate it. Opening up development the ANWR Section 1002 will contribute to global warming. Additionally, the USA will lose credibility in the world as we continue our role as a contributor to the problem of global warming and not a nation that is acting to mitigate the problem. This behavior may also encourage other countries to abandon their practices or to not begin actions to mitigate climate change because if one of the richest countries in the world is not investing in solving the problem, why should they? This to me is the most serious and consequential problem with opening up the ANWR to oil and gas development.

2. I am 67, began training 6 months ago to carry 50 pounds and backpack for 11 days in the ANWR. ANWR is one of the -- if not the -- premier wilderness areas in the world that motivates people such as me to challenge themselves in order to see life untouched, to experience the expansive vistas, and to feel the quiet and solitude of another time.

a. **NOISE HARMS:** Industrial noise will absolutely change the solitude and serenity of ANWR for recreational visitors and this could impact the tourism dollar in Alaska. The tourism dollar is more likely spent in Alaskan communities; however, profits from oil and gas development are more likely to leave the State. Will noise cause some insects, birds and animals to avoid the coastal plain area and harm their biological cycles?

b. **VIEW HARMS:** The Achilik and Jago rivers that run to the coastal plain, that are key routes for caribou, Gwich'in subsistence hunters, and people visiting the back country will be disturbed. The vistas will be irreparably damaged, Will this be more threatening and cause caribou coming to the plain to calf babies to find different less threatening areas but less sustainable areas regarding food, fewer mosquitos and other pests, etc.

c. **PLANT AND OTHER HARMS:** Will the edible, e.g. wooly lousewort, and medicinal plants in the area pick up the extracted minerals taste and smell and will the dust created from the activity settle on the surrounding plants, insects, birds, animals, tundra, rocks, water, snow, ice and rain? Will these plants be crushed and reduced in numbers by 3D seismic exploration? Will these activities lead to some plants and associated insects to become threatened, endangered or eventually extinct?

3. My family is from North Dakota, where oil and gas development of the Bakken shale field have forever changed the landscape, the culture, and the resources of this part of the State.

a. **CONTAMINATION:** Water and soil has been contaminated in N. Dakota not only from the extracted minerals but also from chemicals used in drilling. Will this occur with the drilling on the plains? Will you use cross-directional drilling or fracking on the coastal plain as well as vertical drilling and, if so, what issues will be presented and how will they be mitigated? Will any radioactive elements potentially be used? Chemicals used by companies should be made transparent to regulators, independent observers and the public, unlike in N. Dakota.

b. **INDUSTRIAL HARMS:** Also in N. Dakota, roads have been damaged by the increase in heavy truck travel. Heavy dust has been harmful to people and pets whose farms or homes are close to the dirt highways in northwestern N. Dakota. The people harmed have been the ones forced to continuously attend commission meetings or go to the foreman of the oil field company to complain that the company is not adhering to transportation regulations established by the State. Who will report when illegal or unethical behavior occurs, when a spill or explosion occurs? How will you ensure documentation is accurate? How will we ensure that spills or explosions are reported promptly to attempt to mitigate their consequences or help workers who are harmed?

c. **MONITORING ANWR LIFE AND HABITAT:** One alternative I would like you to consider is hiring wilderness and wildlife monitors to document observations from which to ascertain harm. In Canada, I know that Inuit people's are hired as culturalists and stewards of the land and animals and paid for these services on projects that intrude upon their land. They must have enforcement authority or report to others who have enforcement authority and it must have a consequential financial or prison term impact on the oil companies owners and employees. My concern is that there will be more production workers and the level of local authorities hired can never compete with the kind of staff and other resources that private profit-making companies can provide. I worry that these public servants could only mitigate incremental harms. The only comprehensive solution is not allowing development.

d. **HARMFUL GAS RELEASE FROM WELLS:** Will gas be released or flared from the oil wells? Throughout the Bakken Shield wells centered around Crosby, N. Dakota there are gravel pads, equipment and stacks flaring gas. PennEnergy (see link in italics below)

<http://www.pennenergy.com/articles/pennenergy/2013/07/bakken-shale-natural-gas-flaring-tops-100-million-each-month.html>

has stated in the article referenced in italics above that the amount flared is so high that the light can be seen from space and rivals light visible from mid-size cities. Please consider light pollution and the environmental, health and safety impacts of released gas or flared gas. There have been many significant oil spills and explosions that have killed at least two people. What kind of emergency response system will be established to address oil spills or explosions or how will injured workers be taken to a hospital? The State of Alaska should not be responsible for

costs caused by energy companies but bonds, insurance, and a percent of money should be set aside for these purposes in advance.

e. **SOCIAL ILLS OF INDUSTRIALIZATION:** In N. Dakota the industrialization due to oil and gas development and additional oil workers who temporarily moved to the area for jobs put a strain on water supplies, sewage systems, available housing and government services. In addition, there was an increase in crime e.g. rape, assault, murder and social problems e.g. substance abuse, mental health problems, lack of recreational opportunities, workers separated from their families, a disproportionate number of males vs females, and cultural disparities. From speaking to people in Fairbanks, I'm told that the disproportionate number of males to females is already an issue. Please study these problems and assess their impacts in Alaskan cities and villages. Also, please assess the range of factors that will also impact wildlife, e.g. habitat, water quality, water availability and identify mitigations. If there are not adequate mitigations then this development process should be terminated or, at a minimum, reduced.

f. **ADEQUATE WATER:** I know in N. Dakota water is used and contaminated in oil production. I know that the Arctic's climate is dry. "Over most of the Arctic Islands, indeed everywhere except on the high mountains of the eastern islands, the annual precipitation (rain and Snow combined) is less than 200 mm, less, that is, than anywhere else in North America except for the southwestern desert." (*A Naturalist's Guide to the Arctic, E.C. Pielou, p 15*). There doesn't appear to be an adequate amount of water for oil and gas development and its current use by animals, insects, birds, Gwich 'in hunters and habitat. What will be done about the competing needs for water? How can nature and animals that have no voice compete for water with profit-making businesses?

g. **ABANDONED BUILDINGS:** I would also add in N. Dakota, as soon as the oil boom wound down, the extensive number of "man camps" that were built were abandoned. These dwellings were thrown up cheaply and were not adequate to endure N. Dakota weather conditions. Business owners who made profits off of our ANWR public land should be required to upgrade any abandoned building and rent or sell them at an affordable cost to low-income members of the public once they are no longer needed. Funds should be budgeted for decommissioning costs.

4. May I draw your attention to an alternative way of viewing oil and gas exploration and development in the amicus brief currently in the Colorado Supreme Court supporting the position that the Colorado Oil and Gas Conservation Commission should prioritize public health, safety and welfare when it considers rules related to oil and gas development and not to balance it against the desire of for-profit corporations. Below is a reference link:

<https://www.bouldercounty.org/news/oil-gas-counties-and-cities-ask-colorado-supreme-court-to-protect-public-health-and-safety/>

PRIORITIZE PUBLIC HEALTH, SAFETY AND WELFARE INCLUDING WILDERNESS AND ENVIRONMENT PROTECTION: I would personally add that since it is estimated that the oil and gas reserves from ANWR Section 1002 would amount to approximately 6-9 months, even perhaps a few years, this is an economic issue that could be

mitigated by alternative sources of energy. Nor is it a security benefit of consequence in the long-run.

5. My taxi driver in Fairbanks is barely able to make ends meet. Some days he drives 12 hours and makes no money due to the expense of paying for his cab and the gas. He has not been able to get a better paying job.

a. **LOCAL EMPLOYMENT:** I met a young man who works at the gold mine just outside of Fairbanks. He is paid to fly from Iowa and work 20 days and then is flown back to Iowa for 10 days and so on. He is a very young person, who was a medical assistant. He has very little job experience and none related to drilling cores. I bring this up because the new jobs that would be created will likely not go to the local people. There would need to be requirements specified in the contract that would ensure a -- I would suggest -- majority of jobs are offered to local people and training programs are offered to prepare them for jobs and this would be incumbent on funds established in advance to bring this about, e.g. recruiting, training, transportation, etc.

Submitted by,

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