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[EXTERNAL] Public commentary on ANWR EIS

1 message

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Sat, Jun 16, 2018 at 3:25 PM

Opening the Arctic National Wildlife Refuge Coastal Plain to oil and gas development must be subjected to a thorough analysis before deciding to proceed. If this large, complex ecosystem of undeveloped land is opened to development it will be very difficult to return it to its current state. With all but 23% of the earth's land mass now developed, and undeveloped land disappearing at the rate of 5% per decade, undeveloped land is becoming more and more valuable and should not be degraded for the short-term gain of fossil fuel development.

Please require the EIS to address the following considerations:

This is a cultural, human rights, and food security issue:

For thousands of years, the Gwich'in of Northeast Alaska and Northwest Canada have relied on the Porcupine Caribou herd for food, shelter, clothing, and life itself. The coastal plain is a vital birthing ground, nursery, and insect relief area for the Porcupine caribou. The Gwich'in call the coastal plain "The Sacred Place Where Life Begins." Threats from oil and gas development on the Porcupine caribou herd are threats to the Gwich'in way of life and the future existence of their people.

The DEIS must:

- Address impacts on food security, subsistence rights and subsistence food availability, and resulting sociocultural effects on the Gwich'in and Inupiat people, and explain how these impacts will be mitigated or avoided.
- Make all published documents available in, at a minimum, Gwich'in and Inupiaq and public meetings and Government to Government consultations must provide interpreters for Alaska Native speakers.
- Include a Health Impact Assessment to address impacts to human health and well-being from oil and gas exploration and development and clearly explain how impacts will be mitigated. This includes health impacts from degraded air and water quality, noise pollution, and subsistence access. Data – scientific, traditional, and anecdotal—on health impacts on Nuiqsut from nearby oil and gas development should be used as case studies.

This is a transboundary issue:

Because impacts to the coastal plain transcend U.S. boundaries the DEIS must:

- Address transboundary impacts and how BLM plans to uphold international agreements and consultation requirements, such as the 1987 agreement between the U.S. and Canada on the conservation of the Porcupine caribou herd and international polar bear treaties and agreements.

Oil and gas leasing, exploration, and development are not compatible with the purposes of the refuge:

The Arctic Refuge is the only refuge established specifically "for the purpose of preserving unique wildlife, wilderness, and recreational values." Specifically, purposes include:

- (i) To conserve fish and wildlife populations and habitats in their natural diversity;
- (ii) To fulfill the international treaty obligations of the United States with respect to fish and wildlife and their habitats;
- (iii) To provide, in a manner consistent with the purposes set forth in subparagraphs (i) and (ii), the opportunity for continued subsistence uses by local residents;
- (iv) To ensure, to the maximum extent practicable and in a manner consistent with the purposes set forth in paragraph (i), water quality and necessary water quantity within the refuge.

To the above list of the original purposes, in December 2017 was added a fifth purpose not compatible with the four original purposes.

- (v) To provide for an oil and gas program on the Coastal Plain.

The DEIS must:

- Explain how the USFWS and BLM will address this and ensure that purposes i-iv are not diminished or otherwise compromised by an oil and gas program on the coastal plain.
- Require the USFWS to prepare a compatibility determination as part of BLM's development of the oil and gas program.
- Required BLM to recognize all of the purposes of the Arctic Refuge and adhere to stipulations and requirements of relevant federal laws, such as ANILCA, the National Wildlife Refuge Administration Act, the Endangered Species Act, the Wilderness Act, the Wild and Scenic Rivers Act, the Clean Water Act, the Clean Air Act, and international treaties.
- Explain how oil and gas development can possibly be compatible with preserving wilderness values (which is not exclusive to congressionally-designated Wilderness)
- Require the conservation of fish and wildlife populations and habitats in their natural diversity including, but not limited to, the Porcupine caribou herd (including participation in coordinated ecological studies and management of this herd and the Western Arctic caribou herd), polar bears, grizzly bears muskox, Dall sheep, wolves, wolverines, snow geese, peregrine falcons and other migratory birds and Arctic char and grayling."
- Ensure threatened and endangered species in the refuge are protected.

2000 acres surface development limit:

The tax bill passed in December (PL 115-97) "limits surface development to 2,000 acres for production and support facilities, which need not be concentrated in a single area." This 2,000-acre footprint is often compared to a "postage stamp", a dot on the tip of a nose, the size of an airport. However, these 2,000 acres may not be one contiguous spot; they could be spread throughout the coastal plain relative to locations of desired oil prospects.

The DEIS must require BLM to:

- Identify all production and support facilities that would be included in this limitation and explain how it will be implemented and enforced.
- Include alternatives and analyses of all possible site scenarios for the 2,000 acres limit across the entire coastal plain, including analyses specific to each potential 400,000-acre lease sale.
- Address impacts associated with water withdrawals. Oil and gas development requires large quantities of water diversions and withdrawals. The coastal plain of the Arctic Refuge does not have readily accessible or available water in high quantities (this area differs greatly in that respect from the State land to the west). BLM must list all potential water sources and thoroughly analyze potential impacts to aquatic and riverine systems – localized and downstream – and impacts on resources dependent on those systems and must do so in accordance with the refuge purpose to ensure water quality and quantity within the refuge.

Climate change:

Arctic Alaska is ground zero for climate change; temperatures in the Arctic are rising at twice the rate of the rest of the country. Coastal erosion, melting permafrost, and altered landscapes are happening at a frightening pace. Oil drilling will compound these already devastating impacts locally and globally.

The DEIS must:

- Include the contribution of the proposed actions to climate change from emissions on site and potential emissions from oil and gas once shipped out of state, processed, and burned as fuel.
- Account for how the Coastal Plain is being impacted by climate change.

Summary:

The National Environmental Policy Act requires analysis of all reasonably foreseeable past, present, and future actions and the additive, synergistic, and countervailing cumulative effects of proposed actions. BLM must evaluate all potential future leases on the coastal plain and adjacent federal, state, and Native corporation lands and waters when assessing cumulative impacts.

At a minimum, please require the EIS address all of the recommendations included in this letter. The potential destruction of one of the last great undeveloped areas of the world demands a careful analysis before deciding to proceed.

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