



CoastalPlain\_EIS, BLM\_AK &lt;blm\_ak\_coastalplain\_eis@blm.gov&gt;

---

## [EXTERNAL] Coastal Plain Oil and Gas Leasing Program EIS\_Alaska Wilderness League Comments

1 message

**Kelsie Rudolph** <kelsie@alaskawild.org>

Tue, Jun 19, 2018 at 12:56 PM

To: "Blm\_ak\_coastalplain\_EIS@blm.gov" &lt;Blm\_ak\_coastalplain\_EIS@blm.gov&gt;

Cc: Adam Kolton &lt;adam@alaskawild.org&gt;, Kristen Miller &lt;Kristen@alaskawild.org&gt;

Dear Ms. Hayes,

Please consider and include in the formal record the attached comment letter for the Coastal Plain Oil and Gas Leasing Program EIS from Adam Kolton, Executive Director of the Alaska Wilderness League.

Thank you,

Kelsie Rudolph

**ALASKA  
WILDERNESS  
LEAGUE**

KELSIE RUDOLPH  
*Arctic Campaign Manager*

122 C St NW, Ste 240  
Washington, DC 20001  
Tel: 202-544-5205  
Fax: 202-544-5197  
[www.AlaskaWild.org](http://www.AlaskaWild.org)

*Your Land.  
Your Voice.*

\* Please consider the environment before printing this email.



---

**2018-06-18 AWL Scoping Comments.docx**  
225K



*Your Land.  
Your Voice.*

BOARD OF DIRECTORS

June 19, 2018

President Jimmy Carter  
*Honorary Chair*  
Georgia

Honorable Robert Mrazek  
*Chair Emeritus*  
New York

Betsy Loyless  
*Chair*  
Maryland

Richard Spener  
*Vice Chair*  
Missouri

Gareth Martins  
*Treasurer*  
Colorado

Ellen Ferguson  
*Secretary*  
Washington

Toni Armstrong  
Missouri

Steve Barker  
California

Tom Campion  
Washington

Kristen Grimm  
District of Columbia

Debbie S. Miller  
Alaska

Lorraine Netro  
Yukon, Canada

Brian O'Donnell  
Colorado

David Weinstein  
Montana

Nicole Hayes

Attn: Coastal Plain Oil and Gas Leasing Program EIS

222 West 7<sup>th</sup> Ave., Stop #13

Anchorage, Alaska 99513

*Submitted via email:* Blm\_ak\_coastalplain\_EIS @blm.gov

**Re: Arctic National Wildlife Refuge Oil and Gas Leasing Program**

Ms. Hayes,

We write to provide input to the Environmental Impact Statement that BLM intends to prepare for an oil and gas leasing program on the Coastal Plain of the Arctic Refuge. See 83 Fed. Reg. 17562 (Apr. 20, 2018). The Alaska Wilderness League also provides input to BLM through separate, more technically-detailed comments, submitted by the League and other signatories.

Just before its original establishment, Secretary of the Interior Fred Seaton testified in 1959 to the need for the proposed refuge, he characterized its unique wholeness, ecosystem diversity, and its integral rivers traversing coastal plain to the Beaufort Sea coast:

*The proposed Arctic Wildlife Range offers an ideal opportunity, and the only one in Alaska, to preserve an undisturbed portion of the Arctic large enough to be biologically self-sufficient. It would comprise one of the most magnificent wildlife and wilderness areas in North America... Certain portions of the Arctic coast and the north slope river valleys, such as the Canning, Hulahula, Okpilak, Aichilik, Kongakut, and Firth, and their great background of lofty mountains, offer a wilderness experience not duplicated elsewhere.*

U.S Senate. June 30, 1959. Arctic Wildlife Range- Alaska: Hearing before the Merchant Marine and Fisheries Subcommittee on Interstate and Foreign Commerce on S. 1988. 86<sup>th</sup> Congress, first session. As time has passed, we have only furthered our common understanding of the unique and special values of the Arctic National Wildlife Refuge, and its inestimable coastal plain,



[AlaskaWild.org](http://AlaskaWild.org)

Main Office: 122 C St NW, Ste 240, Washington, DC 20001 \* Tel: 202-544-5205 \* Fax: 202-544-5197

♻️ 100% Recycled Paper and Recyclable

including the great human values it holds for indigenous peoples such as those of the Gwich'in Nation.

To authorize an oil and gas program for the Coastal Plain of the Arctic Refuge, and to elevate oil and gas to a purpose of the Refuge (albeit one that must be subservient to the other non-consumptive purposes) is an affront to the Arctic, and indeed all, refugees. And thus, to be perfectly clear about our position, the League vigorously opposes an Arctic Refuge leasing program, and we believe that the manner in which the authorization was passed – fast-track budget bill proceedings in the U.S. Senate -- provides no integrity to what should be a decision made through full, fair and open debate in the United States Senate. Congress should revisit this terrible legislation, and undo it.

Turning now to the more relevant issue at immediate hand, the League also strenuously objects to the manner in which BLM is proceeding to implement the legislation as passed. As you know, Congress in Section 20001 of the Tax Act required that an Arctic Refuge oil and gas program be managed “in a manner similar to the administration of lease sales under the National Petroleum Reserve Production Act [NPRPA] of 1976.” As detailed in the technical scoping letter joined in by the League, NPRPA includes checks and balances to the management of an oil and gas leasing program. Additionally, other environmental laws apply in full force to such a program, a point clear from the legislation, and one emphasized by Senator Murkowski in her committee remarks in support of the legislation:

I think it's also important to understand that we have not preempted the environmental review process in this legislation. We have not preempted the environmental review, nor have we limited the consultation process with Alaska Natives in any way. All relevant laws, all regulations, and executive orders will apply under this language.

[https://www.energy.senate.gov/public/index.cfm/files/serve?File\\_id=5B08FB7E-B82C-488F-9627-D78DEAF2EBC1](https://www.energy.senate.gov/public/index.cfm/files/serve?File_id=5B08FB7E-B82C-488F-9627-D78DEAF2EBC1). Senator Carper backed this up on the floor, stating that Senator Murkowski:

assured members of the committee that, if the legislation became law, it would require such development be subject to the full scope of environmental review required by the National Environmental Policy Act, or NEPA, as well as other environmental laws. Indeed, earlier in this floor debate, the Senator from Alaska reiterated an assurance that the environmental and local wildlife will always be a concern and a priority and that this legislation does not waive NEPA or any other environmental law.

Cong. Rec. S7697 (daily ed. Dec. 1, 2017)

Unfortunately, the Department of Interior in general and BLM in specific are acting in defiance of the rigorous requirements of the law. You have shoved aside the U.S. Fish and Wildlife Service, which is the agency mandated by law with managing the Arctic Refuge. You are fast-tracking an environmental review process with the goal of holding a lease sale in 2019 rather than using the time allotted by Congress for the administrative process. You short-circuited what should be a comprehensive and inclusive public engagement process for scoping. And, even despite these efforts, we have already seen that a vast majority of testimony heard in

Alaska, in Washington DC, and through electronic comments have voiced clear and strong opposition to development. Furthermore, the public comment period made clear that Americans are seriously concerned with your plans to stunt the substance of the environmental impact statement to meet arbitrary timeframes and page limitations.

Ironically, Senator Murkowski herself revealed in comments to the oil industry why you are acting in this manner:

"There is a strong commitment to ... to get these leases out before the end of this term []. Because once you get those leases out into the hands of those who can then move forward, it's tougher [to stop them].

Hobson, *Road map for ANWR drilling gets clearer*, E&E News, Mar. 12, 2018.

As this situation reveals, Interior's Arctic Refuge oil and gas program administrative process is being driven purely by politics and in disregard of the checks and balances presented in the legislation and our nation's bedrock environmental and public land laws. That this is happening in a process concerning the management of our nation's wildest and most iconic refuge is nothing short of an outrage and an insult, and this abuse of process must stop. The strong concerns laid out in this letter, supported by the majority of comments from participants in this process, regarding the lack of a truly open, comprehensive and unbiased process must be clearly addressed before you move to the next phase of activity.

Further, as is also detailed in the technical comments of which the League is a signatory, there are fundamental data gaps in our understanding of the biology of the Arctic Refuge, especially including the biology that underlies the Arctic Refuge's conservation purposes related to, among others, wildlife, wilderness, subsistence and water values. Congress's established time line for an Arctic Refuge oil and gas program leaves at least four years for the administrative process, leaving room for at least some gathering of missing information. This information should encompass not only the tremendous breadth of biological assessment necessary to ensure good decision-making, but also the economic and fiscal realities associated with this proposal. Just last week, the EIA revealed that oil production from the Arctic Refuge won't take place for another decade at least, at which time U.S. domestic oil needs are uncertain. Over the next decade, improvements in fuel economy are expected to limit domestic demand, which, in turn, will limit the need for Alaskan production. In fact, Alaskan leaders are reported to be courting Chinese and other foreign economies to find an export market for its oil. This effort seems to beg the question – how is it in our national interest to be pursuing irreversibly damaging development on one of the U.S.'s last best pieces of untouched public land to produce oil in search of a foreign market? And the fiscal analysis does not stop there. DOI's assessment must also consider the Tax Act's assumption that this oil and gas program would reduce the federal deficit by \$1.1 billion by 2027. That amounts to an average bonus bid of \$2,750/acre for the 800,000 acres required to be leased by the Tax Act. The BLM should undertake an independent analysis of likely bonus bids for oil and gas leasing in the Coastal Plain using the latest available bidding data in the region and impose a minimum bid requirement to ensure that this fiscal promise is kept to the America taxpayer.

Your evaluation of the potential impacts of an Arctic Refuge oil and gas program must be commensurate with what the law requires, and with what is at risk. So far, it does not appear that

your work will even be in the ballpark of that result. The American people, which in large majority support the conservation purposes of the Arctic Refuge and oppose this program, deserve no less, and you should immediately change course to rectify this situation.

---

Adam Kolton  
Executive Director