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## [EXTERNAL] Scoping Period Comment for Arctic National Wildlife Refuge

1 message

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To: blm\_ak\_coastalplain\_EIS@blm.gov

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I appreciate the opportunity to provide comments and suggestions for topics and issues to be addressed in the Draft Environmental Statement (DEIS) for the proposed oil and gas leasing program on the Coastal Plain of the Arctic National Wildlife Refuge. The Arctic Refuge was established by President Eisenhower uniquely "For the purpose of preserving unique wildlife, wilderness and recreational values."

The Arctic National Wildlife Refuge is the crown jewel of the world's largest wildlife refuge system and is the largest intact natural ecosystem in the United States. It is currently managed as wilderness by US Fish and Wildlife Service and is an incomparable and valuable living scientific laboratory. The Arctic Refuge sustains physical, cultural, and spiritual well-being of the Gwich'in people of Alaska and Canada. The 1987 agreement between the US and Canada requires that both parties:

1. Take appropriate action to conserve the Porcupine Caribou Herd and its habitat.
2. Ensure that the Porcupine Caribou Herd, its habitat, and the interests of users of Porcupine Caribou are given effective consideration in evaluating proposed activities within the range of the Herd.
3. Activities requiring a Party's approval having a potential impact on the conservation of the Porcupine Caribou Herd or its habitat will be subject to impact assessment and review consistent with domestic laws, regulations and processes.

All of this is threatened by this proposed oil and gas development for questionable short-term profits that will produce long-term, major damage to the Arctic Refuge and those who depend on it. The November 2017 nationally representative survey conducted by Yale and George Mason Universities revealed that 70% of the American public are opposed to drilling in the Refuge, with 4 times as many strongly opposed as strongly supportive.

Given this background, the proposed EIS process must include thorough and complete assessments and analyses of the potential impacts of exploration, development, and operations to lands, wildlife, nesting birds, stressed and threatened species, vegetation, fishes, aquatic organisms and vegetation, water quality, air quality, production of noise and greenhouse gases, archeological resources, and especially the effects on all who use and depend on the Arctic Refuge for subsistence, recreation, economic, cultural and spiritual activities, scientific research, observation of wildlife and photography, tourism, and other commercial activities.

These assessments and analyses must cover all potential impacts of the proposed oil leasing and development including:

1. The effects of reneging on the 1987 US-Canada agreement to protect the Porcupine Caribou Herd and its habitat, including the impacts on the Gwich'in people and US-Canada relationships,
2. Surveys of land, air, water, and seismic activities,
3. Land disturbance, noise production, and use of boats, aircraft, land vehicles, and other conveyances,
4. Construction of all infrastructure, including roads, drill pads, pipelines, wells, aircraft facilities, landing strips, and boat ramps,
5. All operations for production and delivery of oil, including vehicles, heavy equipment, oil pumping, and pipelines,
6. Noise produced by any of the above activities as it may affect wildlife feeding, migration, and reproductive activities,
7. Archaeological resources affected by development activities,
8. Migratory birds covered by the [Migratory Bird Treaty Act of 1918](#) (16 U.S.C. 703-712; Ch. 128; July 13, 1918; 40 Stat. 755) as amended by: Chapter 634; June 20, 1936; 49 Stat. 1556; P.L. 86-732; September 8, 1960; 74 Stat. 866; P.L. 90-578; October 17, 1968; 82 Stat. 1118; P.L. 91-135; December 5, 1969; 83 Stat. 282; P.L. 93-300; June 1, 1974; 88 Stat. 190; P.L. 95-616; November 8, 1978; 92 Stat. 3111; P.L. 99-645; November 10, 1986; 100 Stat. 3590 and P.L. 105-312; October 30, 1998; 112 Stat. 2956,

9. The costs of cleanup and mitigation of the many expected oil spills and other forms of contamination, including sewage, waste disposal, refuse, discarded materials and containers, injection of fluids into the ground, and ground and surface water contamination,
10. Melting of permafrost that is likely to release methane gas and cause subsidence of land, roads, and other structures,
11. Generation and release of greenhouse gasses that are likely to accelerate climate change, the resultant impacts on the Arctic Refuge habitat and wildlife, and the associated costs of mitigation,
12. Effects of greenhouse gasses on the Refuge, Alaska, the United States, and the world produced by burning the projected oil development,
13. Effects on the viability of the proposed oil and gas production should the United States rejoin the 2015 Paris Climate Accord,
14. The environmental and social costs and potential economic benefits of projected oil production, including the anticipated price when product is available for the market,
15. The anticipated demand for oil when it is likely to be produced 10 or more years from now, and
16. The potential for reduced demand for the produced oil caused by the inevitable decreased use of fossil fuels as alternative energy production rapidly increases and displaces higher cost and environmentally damaging impacts of burning oil and coal.

Given the numerous issues and problems associated with this proposed oil and gas leasing program and the narrow timetable you have adopted, we do not see how it is possible to conduct and complete the required studies and analyses in the thorough and objective manner required by the National Environmental Policy Act. The DEIS must include a "No Action" option. We urge you to abandon your frantic rush and develop the required DEIS in a manner that will survive inevitable and extensive critical scrutiny and avoid the huge costs to taxpayers should there be litigation prompted by an inadequate DEIS.

Regards,  
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