



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

## [EXTERNAL] Comments for public scoping RE: Coastal Plain Oil and Gas Leasing Program EIS

1 message

**Andy and Kristin Pace** <heymoossekennel@gmail.com>  
To: blm\_ak\_coastalplain\_EIS@blm.gov

Mon, Jun 18, 2018 at 2:29 PM

Hello,

I would like to leave the following comments relating to the Coastal Plain Oil and Gas Leasing Program EIS:

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, therefore, 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. To ensure full public participation, particularly from Indigenous peoples who will be most directly impacted, all published documents must be made available in, at a minimum, Gwich'in and Inupiaq and public meetings and Government to Government consultations must provide interpreters for Alaska Native speakers.

The EIS must 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. The DOI should conduct a Health Impact Assessment.

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 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; (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; and (v) To provide for an oil and gas program on the Coastal Plain. (P.L. 115-97, added in December 2017, with the passage of the tax bill) The recently added purpose (v) is not compatible with the 4 original purposes. The draft EIS 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. Including oil and gas as a refuge purpose could require the USFWS to prepare a compatibility determination as part of BLM's development of the oil and gas program; this has not yet occurred. Oil and gas exploration and development are not permitted under the current Arctic National Wildlife Refuge Comprehensive Conservation Plan (CCP). BLM must acknowledge this discrepancy and describe plans to address this.

Preserving wilderness values (which is not exclusive to congressionally-designated Wilderness) is one of the original purposes of the Arctic Refuge. Oil and gas exploration and development will irrevocably destroy the wilderness character of the coastal plain and will also impact the view shed of the designated Wilderness area to the south of the coastal plain. Leasing begets development and with development comes roads, pipelines, pads, airstrips, gravel mining, water withdrawals, housing, and other infrastructure. BLM must analyze potential impacts to wilderness—including impacts on ecological integrity, wildlife, waters, noise, air quality, vegetation, visual and recreational impacts – and provide mitigation strategies to prevent such irreparable damage.

Preserving unique wildlife was another founding purpose of the Refuge. Specifically, "to conserve 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." The refuge provides essential habitat for countless species and the coastal plain is considered the "biological heart" of the Arctic Refuge. Oil and gas leasing, exploration, and development are incompatible with preserving wildlife and their habitats. BLM must fully analyze potential impacts to wildlife and wildlife habitat and develop appropriate and adequate mitigation measures to ensure preservation of this unique wildlife complex in the

biological heart of the Refuge in accordance with the purpose for which the Refuge was established. BLM must also use the best available science in making determinations and acknowledge data gaps, missing, and unavailable information.

NEPA 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.

Sincerely,  
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