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[EXTERNAL] Coastal Plain Scoping Comments

1 message

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To: blm_ak_coastalplain_EIS@blm.gov

Please acknowledge receipt of my comments.
Denis Ransy



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Scoping Comments Coastal Plain Oil and Gas Leasing
Arctic National Wildlife Refuge

1. Fast Tracked Public Process: The scoping comment deadline should be lengthened. More meetings in communities like Beaver should occur. Reading BLMs streaming service during the two meetings in Fairbanks and Anchorage, I noticed there were 30 people who did not get a chance to testify on the public record in Fairbanks. Other commenters requested meetings in other villages.
2. Please notify me when your scoping report comes out. Please include in that report how many people testified in meetings and the number of public comments that you got.
3. Legality of this process is in question. Competing mandates of federal law and current executive order means nothing can stand in the way of petroleum leasing. But that goes against NEPA and many other laws too numerous to mention.

The 12/22/2017 Executive Order 3360 rescinded authorities inconsistent with American Independent Order 3349. This EO rescinds policies that Department of Interior agencies follow that critically review petroleum extraction on our federal public lands. These are irresponsible policy revocations. Land managers are irresponsible if they do NOT take into account the risks of drought, fire, invasive species, potential sea level rise, storm surges and wildlife impacts all of which are being felt.

What has been rescinded and revoked:

- EO 13653 preparing the US for the Impacts of Climate Change dated 11/11/13
- Power Sector Carbon Pollution Standard dated 6/25/13
- Mitigating Impacts on Natural Resources from Development and Encouraging Related dated 11/3/15, BLM Manual Sec. 1794 Mitigation, BLM Mitigation Handbook H-1794-1.
- 2 Council of Environmental Quality reports on guidance on greenhouse gas emission considerations.
- Climate Change chapter of Interior Department manual to use the best available science, inform decision making and coordinate appropriate response to impacts and I could go on and on.

How will BLM and other agencies implement their legal responsibilities under NEPA including to mitigate the harmful effects of climate change. There is no guidebook on competing mandates. This is what is going on. There is no ability for a no action alternative and no ability to put forth mitigation recommendations.

Without a no action alternative, there is no status quo which will provide baseline data. A way to compare the proposed alternatives. .

4. Alaska and the lower 48 are suffering from a **surplus of drilling leases**.

The National Petroleum Reserve-Alaska NPRA and adjacent state lands are already open for drilling exploration. New discoveries on the North Slope adjacent to the Refuge have estimate of 8.7 Billion Barrels of recoverable oil according to the US Geological Survey in December 2017. This is a billion barrels more than has been predicted for the refuge. The US held off making this discovery public until after the Tax Bill was voted on.

The nation as a whole is awash in lower 48 shale oil and gas. Currently nationwide there are oil and gas leases on over 15 million acres federal land with thousands of drilling permits that have not been used.

Why shouldn't the administration policy be to make those producers use their permits first?

The best indicator we have of industry interest in the North Slope is the ten million acre sale in the NPRA in December 2017 in western arctic of the North Slope. 900 tracts totaling 16,100 square miles were offered. Only 7 tracts by one company were bid. That sale generated only \$1 million.

But I can see the lay of the political landscape. The state and federal government are going to subsidize the oil and gas leasing in the Refuge in various ways even with the surplus of leases elsewhere. I am against the subsidizing the leasing infrastructure by the federal government.

In conclusion, I am opposed to oil and gas drilling on the coastal plain. I support a "no action alternative".

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