



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] Comments for Draft EIS for Coastal Plain Oil and Gas Leasing Program1 message

michaelraffaeli jenbrown <raffaeliandbrown@yahoo.com>

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To: "blm_ak_coastalplain_EIS@blm.gov" <blm_ak_coastalplain_EIS@blm.gov>

Cc: sen.lisa.murkowski@murkowski.senate.gov, "Bailey@murkowski.senate.gov" <Bailey@murkowski.senate.gov>, "congressman.don.young@mail.house.gov" <congressman.don.young@mail.house.gov>, "senator@sullivan.senate.gov" <senator@sullivan.senate.gov>

Please see my comments attached for the Coastal Plain Oil and Gas Leasing Program.

Sincerely, Michael Raffaeli

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23 May 2018

To whom it may concern,

Thank you for taking the time during the scoping process to review my comments on the EIS for oil and gas leasing in the 1002 Area of the Arctic National Wildlife Refuge.

As a permanent Alaskan resident, I have had the opportunity to spend time traveling through the 1002 area twice in the past several years. It impressed me in many ways and has had a lasting impact on me. I have concerns with the potential for development in this area.

I am an avid outdoor and wild land recreationist. I value protecting these lands, especially such unique lands that are representative of America's rich natural heritage. To start, I am unsure why the USFWS recommendation for the area to become Wilderness has not been followed up on, and believe that the information/data gathered for this Wilderness recommendation should be included in the current EIS. For the future generations of Americans, we must look at the long-term benefits to society to provide wild and Wilderness areas- for our health and for the services that intact, functioning ecosystems provide.

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 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 should 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.

I have been told by my US representatives that the technology has gotten better since the area was previously set aside, and that development could happen safely. I would like to see long-term studies outside the 1002 Area that show that environmental degradation of the landscape will not occur and that the technology is indeed safer for wildlife and humans. Given the current problems that have been seen in the last 10 years alone and the number of spills that occur in the Arctic, I am not convinced. The science should be definitive and subject to peer review to show that it is possible for long-term recovery. I am specifically concerned about human health, spills, development and its impacts on wildlife soils and water, possible emission leaks by gases such as methane, and the long-term effects of development of more fossil fuels that contribute to the warming of the Arctic.

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 EIS should include oil spill data on the North Slope for the last 25 years and make a reasonable estimations as to how much oil will potentially be spilled each year and the resulting negative effects and impacts if the 1002 Area were to be developed.

A thorough comparison of intensive and extensive development, infrastructure, and use should be conducted as part of a cumulative effects analysis for any potential development in the 1002 Area and this comparison should be included in the EIS. 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" (emphasis added). 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. BLM must identify all production and support facilities that would be included in this limitation and explain how it will be implemented and enforced.

Alternatives and analyses must include 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.

Gravel roads cause permanent geophysical changes to the landscape, altering permafrost freeze-and-thaw cycles and creating thermokarst. Gravel roads leave a long legacy of changes to the surrounding ecosystem, affect wildlife, and should not be a part of any plan were the area to be developed.

Ice roads likely have major impacts that persist into other seasons and can severely alter hydrology, natural thermal regime, and a wide variety of ecological aspects. Their affects need to be studied further before their use to fully understand the potential impacts and any current data must be included.

Roadless development typically involves a larger gravel pad to accommodate an airstrip and necessary facilities and increased air traffic. Low-flying aircraft disturb many species of wildlife, and may displace individuals from preferred habitats at key times of year. Any plan that includes roadless development, must be mitigated by clear seasonal, geographic, and species- specific flight restrictions similar to existing best management practices.

The effects of gravel extraction and the associated impacts need to be clearly defined for any development that may happen. Air and water quality conditions need to be monitored and the affects of both potential infrastructure and vehicle use need to be calculated and accounted for in the EIS.

It is unclear to me why development is not being considered outside this area first, for example in the NPR-A, to meet the supposed needs of our country's energy demand. The instability of oil prices does not ensure that this development will be done in a sustainable manner nor has it been shown that response to spills would be able to prevent long-term impacts to the ecosystems. As a matter of fact, with more and more jobs in the renewable energy sectors, it is unclear why our nation is even spending energy to continue extracting oil and counting on these jobs. It is short-term gain and sightedness that has not been shown to be good for the long-term. Responsible and sustainable development of areas in NPR-A prior to any development in the 1002 Area should be included as an alternative.

Beyond the local ecosystem effects, this potential development also has larger implications. The 1002 area is the last undeveloped area on the coastal plain and is important to set aside as a natural unaltered ecosystem.

Though the total footprint amount of development is relatively small, in order to meet the legislation's demands, it would have to be spread out over a large area that would have an extensive impact to wildlife that depends on large swaths of undeveloped land. It has not been shown that this sort of development is sustainable, and studies need to be done prior to any development starts. The use of water, where it will come from, and its impacts need to be calculated.

What is the comparable impact to the rest of the Arctic Plain to birds and wildlife? From my understanding, if the impact is similar to what older studies suggest, I question how an EIS could allow for these potential long-term severe impacts. For example, the effects on Arctic birds have not been studied extensively and given the species richness and different preferred habitat of each species, it is difficult to predict the effects across all species of birds. The main impacts to birds are habitat avoidance and displacement, vehicle-related disturbance, movement alterations, and geophysical changes and potential dust fallout. These need to be studied prior to any consideration for development for an EIS to fully understand the long-term impacts of any development.

In short, thorough current studies need to be completed to fully understand the impacts to the hundreds of migratory and resident birds and wildlife. In particular, understanding the use of the area by the Porcupine Caribou herd needs to be fully understood. Current data shows that displacement of caribou caused by development occurs. This would be unacceptable and is especially important in regards to the potential impacts that an alteration to this herd of caribou's life-cycle might have on the Gwich'in people. The EIS 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.

Finally, the impacts to the coastal plain transcend U.S. boundaries. The EIS must address trans-boundary 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.

Thank you for taking the time to consider these comments and include them into the EIS.