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[EXTERNAL] Scoping comments on Arctic Wildlife Refuge Coastal Plain Oil & Gas Leasing Program EIS1 message

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I have numerous concerns with the proposed Arctic Wildlife Refuge Coastal Plain Oil & Gas Leasing Program.

First and foremost, before any further incursion on the area north of the Brooks Range occurs, a cumulative environmental impact statement should be completed for the entire North Slope. From east of the Canning River (Point Thompson) well past the Colville River (two-thirds of the way into PET-4) is an industrial complex with all the associated impacts. The general thinking is development there is made up of isolated structures and one large pipeline. This is certainly NOT the case with broad banks of gathering lines (where most of the leaks have occurred) to roads, airstrips, housing, treatment plants, powerlines and all other types of construction necessary for large scale activity stretching the entire length and growing with each new lease.

Preserving the entire Arctic Wildlife Refuge is critical for many reasons, not the least of which is its importance to the health and well-being to the Alaska and Canadian native people who rely on the porcupine caribou that extensively use the area. Maintaining the Arctic Refuge in its unspoiled condition is vital as a scientific workshop to compare what is happening to the rest of the nation's parks and refuges where human activities are having greater and greater impacts.

The requirement for a speedy determination belies the enormous complexities inherent in this project. It must be determined that all applicable laws and regulation are satisfied before this ill-advised proposal proceeds.

The called-for 400,000-acre leases in very short timeframe is mind-boggling. It virtually assures poor decision-making both on the part of industry and government. Both personnel and financial resources will be at a premium. The assertion that only 2000 acres will be disturbed per drill site is absurd. One only has to look at the development across the rest of the north slope.

The hydrologic and geologic regime east of the Canning is significantly different from west of the Canning. Water and gravel are much less available, both of which are needed by the industry. All potential water sources and a thorough analyze of potential impacts to aquatic and riverine systems, localized and downstream, and impacts on resources dependent on those systems must be done. These must be done in accordance with the refuge purpose to ensure water quality and quantity within the refuge. Gravel is necessary for drilling pad requiring a comprehensive evaluation of potential sources and proximity to potential drill sites.

Wildlife, including endangered species, must be protected.

Finally, the Arctic National Wildlife Refuge is the largest wildland unit in the National Wildlife Refuge System and is America's finest example of an intact, naturally functioning community of arctic/subarctic ecosystems. Such a broad spectrum of diverse habitats occurring within a single protected unit is unparalleled in the circumpolar north and should not be sacrificed on the alter of oil and gas.

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