



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] Scoping comment-Coastal plain: valuations1 message

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Before P.L. 115-97, the coastal plain was the only five percent of the North Slope (the land north of the crest of the Brooks Mountain Range and between Canada and the Chukchi Sea) of Alaska protected by statute *from* drilling. It was a refuge *from* surrounding extractive uses. Put another way, it was the only five percent protected *for* non-commodified, non-industrialized life, including the Porcupine Caribou Herd's calving entwined with the nutrition, spirituality, and culture of the Gwich'in Nation.

The new law assumes coastal plain lease sales will raise \$2.2 billion over the next decade. Half of this is marked for the federal government to offset tax cuts, the other half to fund Alaska. Based on recent bids for leases elsewhere in the North Slope, this government accounting is a ten-fold overestimate of coastal plain leasing income. Leasing revenue over the next 10 years would more likely add up to mere millions of dollars. And that depends on whether oil and gas companies decide to go forward at all in such a risky business. Drilling in the arctic is more expensive and tricky than elsewhere and the threat of sunk costs is real.

In terms of oil revenue, the high-end projected total spread across the forty year presumed life of presumed coastal plain oil fields might total \$296 billion, with another \$175 billion of funding for Alaska.

The total dollars projected, even at inflated estimates, would not pay off even half this current year's federal budget deficit. For Alaska, the money would not cover even a single human generation's worth of annual state budgets. And this is without taking into account other costs—including increasingly expensive climate warming consequences to food security, land and human health, and infrastructure across multiple generations.

It turns out, however, that such so-called economic externalities are not actually external to robust, durable economies, but are inseparable from them. Enough is enough. I call for an accounting of the worth of the coastal plain that regards the foundations of flourishing peoples—particularly Alaska Natives. I call for an accounting that respects other-than-monetary valuations of what is non-negotiable for life—particularly conditions of health, including long co-evolved soils, waters, plants and animals in self-renewing relations with a habitable global climate.