



CoastalPlain\_EIS, BLM\_AK <blm\_ak\_coastalplain\_eis@blm.gov>

---

## [EXTERNAL] Comments Coastal Plain Oil and Gas Leasing Program EIS

1 message

---

**Ruth Wood** <tothedogs@mtaonline.net>  
To: blm\_ak\_coastalplain\_EIS@blm.gov

Mon, Jun 18, 2018 at 3:22 PM

---

### 2 attachments



**Arctic National Wildlife EIS comments of Ruth D Wood.pdf**  
53K



**ATT00001**  
18K

TO: Nicole Hayes, Project Coordinator and BLM Staff

FROM: Ruth D. Wood, Talkeetna, Alaska

DATE: June 18, 2018

VIA EMAIL TO: **blm\_ak\_coastalplain EIS@blm.gov**

RE: Comments Coastal Plain Oil and Gas Leasing Program EIS

Dear Custodians of the Arctic National Wildlife Refuge,

I first visited the Coastal Plain of the Arctic National Wildlife Refuge 26 years ago. I wanted to see this special place in America that I had heard and read so much about. I was astounded at its beauty and abundance of wildlife from tiny plants that grow nowhere but the Arctic; to grayling swimming in pools; to nesting birds in the tributary valleys and along the riverbank; to the magnificent caribou males and the romping caribou calves watched over by anxious caribou mothers; to the wolves, bears, red fox, arctic fox, wolverine and more than I can list. I have been back many times since. I have hiked and rafted and canoed. I have watched the polar bear nap on the sand bars off of Kaktovik. I have dipped my toes into the Arctic Ocean.

In the simplest of terms it would be a sin to destroy this incredible place. That's why so many people, even those who have not visited the Refuge, are opposed to drilling in the 1002 area.

**With all my heart and soul, I oppose exploration, leasing, and oil and gas development in the Coastal Plain of the Arctic National Wildlife Refuge. Therefore,**

First, the EIS must include a No Drill Alternative, and BLM must evaluate the No Drill Alternative as a viable alternative with real and meaningful scientific consideration. Congress's move to open the Refuge in the tax bill does not compel BLM to find that drilling is acceptable. BLM can and should make the No Drill Alternative the Preferred Alternative.

Second, the EIS must include an extensive mitigation plan based on scientific analysis for any alternative that allows exploration or drilling in the 1002 area. Exploration or development will have impacts that destroy animals and habitat. Waiting for the impacts to happen is not acceptable. The polar bear, for example, is already threatened. Exploration and development in the 1002 area will add to that stress. What will be done to protect the polar bear? All of the important species and habitat must be identified, the impacts and cumulative impacts must be addressed, and a plan to deal with them must be made. And, this must happen before any exploration or development. It must be part of the EIS.

Congress acted frivolously and arbitrarily to include opening the Coastal Plain to development in a tax bill. The Refuge was created by specific legislation to preserve and protect fish and wildlife and habitat, wilderness, and recreational values. The addition of providing for an oil and gas program on the Coastal Plain is incongruous and makes the purposes a contradiction in terms.

Ruth D. Wood, Talkeetna, Alaska  
Comments Coastal Plain Oil and Gas Leasing Program EIS  
June 18, 2081

The EIS must recognize this contradiction in terms and the impossibility of meeting the original purpose with the addition.

Additional incongruous terms are in the legislation. BLM is mandated to offer at least two area-wide lease sales of at least 400,000 acres in the next ten years. The bill also limits surface development to 2,000 acres for production and support facilities, which need not be concentrated in a single area. What??? That 2000 acres is a ruse. Development infrastructure requires connections, and a loose interpretation of that 2,000 acres would mean roads and infrastructures over the entire area leased. At least 2 sales with no limit on the number of sales and at least 400,000 acres with no limit on the number of acres offered - that is insufficient information. Given the original and still primary purposes of the Refuge, The EIS must identify and address the acres that will and will not be offered for leasing and define and limit the footprint.

The Coastal Plain of the Arctic National Wildlife Refuge holds the only part of the Arctic Ocean coast in the U.S. that is closed to oil and gas exploration and drilling. And, that remains true until an area is leased. The EIS must identify the Coastal Plain as important habitat for wildlife, including but not limited to the Porcupine Caribou and the Polar Bear. The EIS must identify sufficient and contiguous coastal habitat that shall be left undeveloped to protect fish and wildlife and meet the original purposes for which the Refuge was established. The new additional purpose added in the tax bill does not take precedence over the original purposes.

Those of us who know and care about the Arctic National Wildlife Refuge are quite concerned that the Administration is rushing to get the Refuge opened for development and hold a lease sale. There is no rush, certainly no rush that would justify an incomplete EIS process. There is no oil shortage. The EIS must be done correctly. The EIS must address the requirements of existing Federal legislation that protects our fish and wildlife, our waters, our people, our health, and that means the EIS cannot be fast-tracked.

And, the public must be given ample and adequate opportunity to comment and that comment must be taken into account meaningfully as the process continues.

Sincerely,  
Ruth D. Wood  
Talkeetna, Alaska