



CoastalPlain\_EIS, BLM\_AK &lt;blm\_ak\_coastalplain\_eis@blm.gov&gt;

---

**[EXTERNAL] Comments on the Notice of Intent**

1 message

---

**Deborah Williams** <deborah1518@gmail.com>  
To: blm\_ak\_coastalplain\_EIS@blm.gov

Mon, Apr 23, 2018 at 11:20 AM

To: Bureau of Land Management

From: Deborah Williams

Subject: Comments on the Notice of Intent

Date: April 23, 2018

The Coastal Plain of the Arctic National Wildlife Refuge is one of the most biologically and culturally significant areas in the nation. It is essential that the Environmental Impact Statement (EIS) be thorough, comprehensive, in-depth, accurate, cumulative, deliberate, and scientifically sound.

Because the Coastal Plain and its natural resources are so effected by and vulnerable to climate change, it is especially important that all climate change scenarios (from low emissions to high emissions) be analyzed with respect to the environmental impacts of oil and gas development in this irreplaceable National Wildlife Refuge. This will take considerable time and cannot be rushed. Similarly, the cumulative impacts of North Slope oil and gas exploration and development need to be analyzed in the EIS.

Given the environmental and cultural complexity of what is at stake, it is imprudent, and would be contrary to the National Environmental Protection Act to engage in expedited, incomplete, and inadequate analyses.

In these short comments, I will be elaborating a little on the points above.

(1) **Climate Change.** As we know, climate change has had, is having, and will – to an even greater extent—have a dramatic impact on the Coastal Plain of the Arctic National Wildlife Refuge and surrounding terrestrial and marine areas.

The EIS needs to thoroughly analyze the impacts of oil and gas exploration and development on the Coastal Plain, given climate change, using a low, medium, and high emissions scenario. It would be indefensible not to do this.

The development/climate change analyses need to extend to impacts on

a) permafrost,

b) ice roads,

c) flora,

d) fauna, including, of course:

polar bears (denning disturbances, on-land disturbance, food source issues, in defense of life and property takes, etc.),

caribou (migration patterns and disturbances), calving disturbances, food availability, etc.),  
snow geese and other birds (including birds attracted to human developed sites and their impacts),  
insects,  
small predators (including small predators attracted to human developed sites),  
invasive species

- e) lichen,
- f) air quality,
- g) water quantity
- h) water quality (both quantity and quality are impacted by development and climate change),
- i) noise,
- j) subsistence impacts (both flora and fauna)
- k) additional impacts on the Gwichin' and other peoples,
- l) ecotourism
- m) etc.

To be meaningful, these analyses cannot be cursory. Under NEPA, the public needs to know the impacts of oil and gas development given the reality of climate change, using low, medium, and high emissions scenarios.

## (2) Cumulative Impacts

The Cumulative Impacts of oil and gas development on the Coastal Plain of the Arctic National Wildlife Refuge need to be viewed as the total effects on the resources, ecosystems, and

human communities of that development and all other activities affecting the resources no matter what entity (federal, non-federal, or private) is taking the actions.

The Cumulative Impacts are significant in America's Arctic and the EIS needs to include the following:

- a) Other on-shore oil and gas development on the North Slope (both existing and proposed)
- b) Off-shore oil and gas development in the Arctic Ocean (existing and proposed)
- c) Increased shipping and other vessel traffic (including from tourism) in the Arctic Ocean given the melting of the polar ice cap
- d) The melting of the polar ice cap and the contribution of the development to it
- e) Air pollution from other sources, including international sources
- f) Increased air traffic from all impacting sources
- g) Ocean acidification (which is especially pronounced in the Arctic Ocean)
- h) Sea level rise
- i) Increased noise from all sources

j) etc.

Thank you for including all of these critical and necessary analyses in the Environmental Impact Statement.

Submitted by,

Deborah L. Williams, J.D.

Resident of Alaska for 37 years

Owner of Property in Alaska

Currently residing at: 451 Barling Terrace, Goleta, CA 93117

Former Department of Interior Employee in Alaska

*Deborah Williams, J.D.*

[deborah1518@gmail.com](mailto:deborah1518@gmail.com)



**Coastal Plain NEPA Comments Notice of Intent.docx**  
21K

To: Bureau of Land Management

From: Deborah Williams

Subject: Comments on the Notice of Intent

Date: April 23, 2018

The Coastal Plain of the Arctic National Wildlife Refuge is one of the most biologically and culturally significant areas in the nation. It is essential that the Environmental Impact Statement (EIS) be thorough, comprehensive, in-depth, accurate, cumulative, deliberate, and scientifically sound.

Because the Coastal Plain and its natural resources are so effected by and vulnerable to climate change, it is especially important that all climate change scenarios (from low emissions to high emissions) be analyzed with respect to the environmental impacts of oil and gas development in this irreplaceable National Wildlife Refuge. This will take considerable time and cannot be rushed. Similarly, the cumulative impacts of North Slope oil and gas exploration and development need to be analyzed in the EIS.

Given the environmental and cultural complexity of what is at stake, it is imprudent, and would be contrary to the National Environmental Protection Act to engage in expedited, incomplete, and inadequate analyses.

In these short comments, I will be elaborating a little on the points above.

(1) **Climate Change.** As we know, climate change has had, is having, and will – to an even greater extent—have a dramatic impact on the Coastal Plain of the Arctic National Wildlife Refuge and surrounding terrestrial and marine areas.

The EIS needs to thoroughly analyze the impacts of oil and gas exploration and development on the Coastal Plain, given climate change, using a low, medium, and high emissions scenario. It would be indefensible not to do this.

The development/climate change analyses need to extend to impacts on

a) permafrost,

b) ice roads,

c) flora,

d) fauna, including, of course:

polar bears (denning disturbances, on-land disturbance, food source issues, in defense of life and property takes, etc.),

caribou (migration patterns and disturbances), calving disturbances, food availability, etc.),

snow geese and other birds (including birds attracted to human developed sites and their impacts),

insects,

small predators (including small predators attracted to human developed sites),

invasive species

e) lichen,

f) air quality,

g) water quantity

h) water quality (both quantity and quality are impacted by development and climate change),

i) noise,

j) subsistence impacts (both flora and fauna)

k) additional impacts on the Gwichin' and other peoples,

l) ecotourism

m) etc.

To be meaningful, these analyses cannot be cursory. Under NEPA, the public needs to know the impacts of oil and gas development given the reality of climate change, using low, medium, and high emissions scenarios.

## **(2) Cumulative Impacts**

The Cumulative Impacts of oil and gas development on the Coastal Plain of the Arctic National Wildlife Refuge need to be viewed as the total effects on the resources, ecosystems, and human communities of that development and all other activities affecting the resources no matter what entity (federal, non-federal, or private) is taking the actions.

The Cumulative Impacts are significant in America's Arctic and the EIS needs to include the following:

- a) Other on-shore oil and gas development on the North Slope (both existing and proposed)
- b) Off-shore oil and gas development in the Arctic Ocean (existing and proposed)
- c) Increased shipping and other vessel traffic (including from tourism) in the Arctic Ocean given the melting of the polar ice cap
- d) The melting of the polar ice cap and the contribution of the development to it
- e) Air pollution from other sources, including international sources
- f) Increased air traffic from all impacting sources
- g) Ocean acidification (which is especially pronounced in the Arctic Ocean)
- h) Sea level rise
- i) Increased noise from all sources
- j) etc.

Thank you for including all of these critical and necessary analyses in the Environmental Impact Statement.

Submitted by,

Deborah L. Williams, J.D.  
Resident of Alaska for 37 years  
Owner of Property in Alaska  
Currently residing at: 451 Barling Terrace, Goleta, CA 93117  
Former Department of Interior Employee in Alaska  
deborah1518@gmail.com