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[EXTERNAL] Response to Notice of Intent To Prepare an Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program, Alaska

1 message

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I am deeply concerned about the cultural and environmental harms that will occur as a result of leasing the Coastal Plain of the Arctic National Wildlife Refuge for oil and gas exploration and development.

The EIS for the Department of the Interior's misguided initiative to even consider leasing must give priority consideration for the No Action Alternative and fully analyze all of the threats posed by oil and gas exploration and development, including, but not limited to:

- The climate change impacts of exploring for, developing and using any fossil fuels in an area that is already seeing impacts from sea level rise, coastal erosion, loss of winter sea ice and decreased snow cover;
- The global climate change impacts of using any fossil fuels found in the area;
- All direct and indirect effects of surface disturbance due to roads, seismic surveys, drilling sites, well pads and roads or pipelines used to transport products on sensitive wildlife species – especially the polar bears, migratory birds, musk oxen and the Porcupine Caribou Herd the Arctic National Wildlife Refuge was set aside to protect;
- All secondary impacts, such as infrastructure development and population growth associated with fossil fuel development in the area within and beyond the boundaries of the Arctic National Wildlife Refuge;
- The risk of negative impacts on the Gwich'in Nation, which has relied on the caribou for its subsistence for millennia and considers the Coastal Plain to be "the sacred place where life begins" because it serves as a critical calving and rearing area and migration corridor for the Porcupine Caribou Herd; and
- The enormous difficulties of adequately responding to product releases and spills in the Arctic environment within and beyond the Arctic National Wildlife Refuge, and the irreversible harm that would be caused by a major oil spill there.

I recognize that the Department of the Interior may be required to consider leasing due to provisions in the Tax Cuts and Jobs Act of 2017 (Public Law 115-97, Dec. 22, 2017). However, that statute does not justify circumventing the National Environmental Policy Act (NEPA) by too narrowly defining the purpose and need for leasing. Indeed, the purpose and need must be defined broadly, so as to ensure fair consideration of alternative ways of meeting the energy and employment needs of our Nation today and in the future.

If the purpose and need for leasing is defined to meet energy and employment needs of the United States, then the EIS must take a hard look at alternative ways of meeting those needs, including renewable energy technologies and using existing energy resources more efficiently, rather than extracting and using more fossil fuels on a planet that is already reeling from the effects of climate change. A fair and unbiased analysis of these alternatives could demonstrate that the risks associated with leasing and development of

the Arctic National Wildlife Refuge are simply not worth it and that it should be left to be a wildlife refuge – as its creators and a substantial majority of the America public have wanted it to be for generations.

In short, imposing fossil fuel development on the Arctic National Wildlife Refuge is incompatible with its purposes and inconsistent with our vision of what areas set aside for environmental protection should be. Therefore, it is imperative that the Department of the Interior proceeds with extraordinary caution and sensitivity in complying with its obligations under NEPA regarding this matter.

John Brink

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