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[EXTERNAL] Coastal Plain Comments--thank you

1 message

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To: blm_ak_coastalplain_EIS@blm.gov

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A number of people giving public testimony at the BLM hearing in Anchorage asked the staff to select the “No Action” alternative. Yet when I talked about choosing the “No Action” alternative as the Preferred Alternative with Assistant Secretary Balash, he said something along the lines of, “That isn’t possible. Have you read the legislation?”

It is my understanding that NEPA requires serious consideration of a No Action alternative, even though Congress passed a law saying that leasing shall occur. The public needs to see what the environmental, social, economic, and cultural impacts of leasing/drilling are likely to be. But we ALSO need to see the environmental, social, economic, and cultural impacts of not offering leases. For example, there are great economic costs to climate change and a “business as usual” approach of continuing to develop new oil fields. Avoiding these climate-change-related-economic costs would have an economic benefit to society that should be captured in the No Action alternative. Similarly, there are benefits to society to having this great wilderness remain intact. It may not be easily commodified, but it is real nonetheless. Do a state-of-the-art contingent valuation study and include it in your No Action discussion.

Provide deep justification for No Action. Don’t ignore the No Action section thinking, “We’re not going to work very hard on this section because Congress passed the law requiring leasing already.” Also, don’t use the No Action alternative merely as a baseline, neither positive nor negative, against which to compare the other alternatives. No Action in this case IS an action. Leaving things as they are—protecting wilderness as it is—is a valid choice that has value for many Americans, so make a serious case for it as one of your alternatives. (Then choose it.)

Lastly, I believe that a future Congress may re-consider selling oil and gas leases in the Coastal Plain. They will need a robust “No Action” discussion in your EIS to be able to make a good decision.

Thank you.

Sincerely,

Jan Bronson

Anchorage AK

2 attachments

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