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[EXTERNAL] coastal plain comments

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I'm concerned about protecting the Porcupine Caribou Herd, as I've written about in earlier comments. The other problem I see--that I think may be too big to mitigate--is the effect of this proposed leasing and development on the climate.

The EIS must make a serious attempt to quantify the greenhouse gas emissions triggered by oil and gas development, and address their consequences. This must include emissions from burning oil and gas once it gets to market. It hope you are getting a lot of comments about that. But it also must include the very significant “fugitive” methane emissions from production, processing, transmission, storage and distribution, (For example, North Slope oil and gas fugitive greenhouse gas emissions were greater than 10 million tons of CO2 equivalent in 2013 according to EPA, for a sense of the scale of the problem.)

Furthermore, EPA methane emissions estimates may be way too low. When you are calculating cumulative fugitive emissions for the North Slope of Alaska, please consider the possible under-reporting of escaping methane and take that into your calculations.

<http://www.news.ucsb.edu/2014/013953/americas-leaky-natural-gas-system-needs-fix>

“Atmospheric tests covering the entire country indicate emissions around 50 percent more than EPA estimates — and that's a moderate estimate.”

In February, Harvard researchers published [an explosive paper in Geophysical Research Letters](#). Using satellite data and ground observations, they concluded that the nation as a whole is leaking methane in massive quantities. Between 2002 and 2014, the data showed that US methane emissions increased by more than 30 percent, accounting for 30 to 60 percent of an enormous spike in methane in the entire planet's atmosphere. Paper here:: <https://agupubs.onlinelibrary.wiley.com/doi/epdf/10.1002/2016GL067987>

There is a global carbon budget that scientists say we must stay below to avoid catastrophic global warming. You must address this in the EIS.

Because really, in addition to a safe place to drop and raise their young, the Porcupine Caribou Herd needs us to stop burning oil for energy. It is not enough to write an EIS that has stipulations for oil and gas development such as, “All pipelines must be elevated at least five feet above the ground or buried; vehicle, aircraft, and pedestrian traffic must be limited in these ways during these times and places; the numbers of pads must be minimized by using horizontal drilling,” and so forth. To quote bear biologist Steven Armstrong, “If we don’t stop burning oil, all the regulations we put on the ground won’t matter. If we don’t stop global warming, none of this matters.”

In other EISes that I’ve seen there is a “No Development” alternative that is considered. Choose the “No Development” alternative this time. Choose the big picture. We are already in a period of rapid extinctions worldwide. Err on the side of protecting the caribou and protecting the climate, which will ultimately protect humans as well.

Thank you.

Jan Bronson

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