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Attn:

Coastal Plain Oil & Gas Leasing Program EIS  
222 west 7th Ave, Stop #13  
Anchorage, AK 99513



Bureau of Land Management  
Anchorage, Alaska 99513

June 1, 2018

I am providing comments in response to the public scoping for the Coastal Plain Oil and Gas Leasing EIS. The Coastal Plain is part of the Arctic National Wildlife Refuge (ANWR) so comments will refer to both.

The December 2017 tax bill (PL 115-97) tacked an additional provision onto the purposes of the long-established Refuge. Original purposes were to conserve fish and wildlife populations and habitats, provide for continuation of local subsistence uses, fulfill international treaty obligations in regard to fish and wildlife and protect water quality and quantity. The new tax bill added the provision for an oil and gas program on the Coastal Plain. Providing an oil and gas program means leasing, exploration, development and transport. These are incompatible with the original purposes of fish, wildlife and water protection. Specifically, the new tax bill requires a minimum of two lease sales with a minimum of 400,000 acres each, within 7 years.

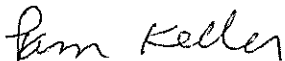
How will the BLM reconcile these conflicting purposes? The Coastal Plain is not a minor, unimportant habitat zone, it is core, essential habitat. Caribou, bears, Dall sheep, wolves, wolverines, migratory birds and fish depend on this habitat. Some of these species are threatened including the Porcupine caribou relied on by the Gwich'in people, and the Southern Beaufort Sea population of polar bears. As required by law, all potential impacts (including additive and cumulative) must be analyzed using the best available science and mitigation measures determined.

The tax bill limits surface development to 2,000 acres but does not put any limits on the number of sites. In other words, the surface disturbance could be scattered across the entire lease area. How will the BLM analyze the impact of such widely variable impact scenarios?

Water is problematic in the coastal plain. It may not be readily accessible or available. The BLM must ensure that the large quantities required by oil and gas development can be accommodated without impacting other uses. Likewise, water quality must not be impacted.

Climate change impacts must also be analyzed. It's very hard to imagine a safe scenario for oil drilling in this area of increasingly rapid permafrost melt, sinks, slides and erosion. The ANWR coastal plain has enough challenges due to climate change without adding an oil and gas program.

There is no way oil and gas exploration and development can occur on the ANWR coastal plain without harmful and irreparable impacts.



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