



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] Comments on the Coastal Plain Oil and Gas Leasing Program EIS

1 message

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To: blm_ak_coastalplain_EIS@blm.gov, lellis@blm.gov

I am writing to provide public comments on BLM's plans for destructive oil and gas drilling on the Coastal Plain in Alaska.

1. Public Scoping Process. As a preliminary matter, it is outrageous that the sole public scoping meeting you have planned in the lower 48 states is on the Friday evening of Fathers' Day weekend. Drilling on the Coastal Plain is wildly unpopular; 70% of the American public opposes it. Oil industry allies in Congress were only able to slip Arctic Refuge drilling into the tax bill by circumventing normal procedures with an expedited legislative process, as winning support for such a controversial measure would otherwise have been impossible. In this context, limiting public scoping outside of Alaska to a single meeting on a Friday evening is entirely unconscionable and contravenes basic principles of meaningful and fair public notice and comment.

2. Wildlife. Oil and gas drilling would have devastating and irreversible impacts on the wildlife in the Arctic National Wildlife Refuge, which was established for the purpose of "preserving unique wildlife, wilderness and recreational values." The Arctic Refuge supports the greatest variety of plant and animal life in the entire circumpolar north. The area is home to endangered species like musk oxen, wolves, and the imperiled polar bears, which are becoming increasingly dependent on the Refuge's on-shore habitat as climate change continues to melt the sea ice upon which they have long depended. It is also the habitat for thousands of migratory birds that travel from all 50 states, and the calving grounds for the Porcupine Caribou Herd, one of the largest animal migrations in North America.

3. Indigenous Peoples. Oil and gas drilling would have devastating and irreversible impacts on the indigenous Gwich'in people, who consider the Coastal Plain of the Arctic Refuge sacred, and who have lived on its land for centuries. Protecting the Coastal Plain, and in particular the Porcupine Caribou Herd, is a matter of basic human rights for the Gwich'in, as drilling threatens to alter caribou migrations and lower birth rates, risking the Gwich'in way of life and culture.

4. Climate Change. Oil and gas drilling would have devastating and irreversible impacts on the planet's climate. Scientific research now overwhelmingly concludes that Arctic oil and gas reserves must remain in the ground to avoid dangerous levels of global warming. We are not in the Dark Ages here. This is not a debate.

5. Alaska. Oil and gas drilling would have devastating and irreversible impacts on the state of Alaska and its residents. Alaska is already warming twice as fast as the rest of the nation and experiencing harsh impacts, from community relocation to permafrost melt to wildfires, that will only be exacerbated if more fossil fuels are extracted and burned. Villages are being eroded into the sea, permafrost melt is making infrastructure insecure, and food sources are disappearing. More oil drilling will compound the devastating impacts already being felt from climate change throughout the Arctic. In addition, oil development would emit dangerous levels of toxic pollutants that could lead to respiratory illnesses and other health problems among the Iñupiat communities that live on the Coastal Plain.

6. Our Nation's Energy Future. Oil and gas drilling on the Coastal Plain is irresponsible and unnecessary at a time when we should be transitioning to a renewable energy future. The Comprehensive Conservation Plan, which guides management of the Arctic Refuge, was finalized in 2015 and recommended permanent protection for the Coastal Plain by designating it wilderness.

7. Requirements for a legally adequate EIS. The Draft Environmental Impact Statement must:

- Include *thorough and complete assessments and analyses* of the potential impacts of exploration, development, and operations – including seismic surveys, land disturbance, noise, construction of supporting infrastructure, and transportation and delivery of equipment, and oil spills – to the land, vegetation, wildlife, air and water quality, climate, and subsistence, recreational, economic, cultural, and scientific research activities. This must include studies about the effects of these activities on key species such as caribou, polar bears, wolves, and migratory birds.
- *Meaningfully* consider reasonable alternatives, including a "no leasing" or "no action" alternative.

- Be completed on a timeline appropriate to adequately examine the vast array of impacts on the wildlife and cultural values in this exceedingly sensitive area. The expedited timeline BLM proposes is reckless and dangerous. Rushing through an EIS in an area as ecologically and culturally rich and sensitive as the Coastal Plain in less than a year would undoubtedly violate the National Environmental Policy Act. Furthermore, the suggestion of a 15- age limit is arbitrary and capricious and violates the basic tenants of the National Environmental Policy Act and the legislative intent behind it.

In short, from its short-shrift approach to scoping to its proposed unreasonable time frame for the EIS, BLM has already signaled that it has pre-judged this issue and plans to disregard the serious biological, cultural, and climate impacts fossil fuel extraction will have in the rapidly-warming Arctic. **I am writing to urge you to reverse course and take the EIS process seriously, complying with all requirements of the National Environmental Policy Act.**

Sincerely,
Laura Colangelo Dumais
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