

To: BLM
From: John Wolfe Jr., 3039 Alder Cir., Anchorage
Date: 19 June 2018
Re: Coastal Plain Oil and Gas Leasing EIS—Scoping

I have lived in Anchorage all my life and am among the many Alaskans opposed to oil and gas activity on the coastal plain of the Arctic Refuge. I suspect you will hear plenty about why oil and gas leasing should not occur at all, and in general I agree with such sentiment. However, Congress has acted, and BLM now seeks comments on the scope of an EIS for a leasing program.

The 2017 Tax Act adds a “purpose” for which the Refuge was established (rather after the fact to establish founding purposes ...); it establishes an oil and gas program purpose on the coastal plain. In preparing for a leasing program, all the other purposes Congress originally listed in ANILCA must be observed. This is obviously a highly sensitive area, given the stalemate over this drilling issue since well before ANILCA in 1980. The 1002 Area, with the rest of the refuge, is the “last” and largest intact combination of de facto and designated wilderness in the United States. The refuge, including the coastal plain, is what its name implies: a refuge for wildlife. It will be against the law to establish an oil and gas leasing program that leads to oil and gas development that:

- (i) Diminishes the natural diversity of wildlife species in the refuge, including birds, mammals, and fish as listed in ANILCA 303(2)(b).
- (ii) Violates treaty obligations regarding the Porcupine Caribou Herd, migratory birds, and other fish and wildlife, as listed in ANILCA 303(2)(b).
- (iii) Diminishes the opportunity for subsistence uses by local residents, as listed in ANILCA 303(2)(b).
- (iv) Diminishes water quality and water quantity in the coastal plain, as listed in ANILCA 303(2)(b).

The Leasing EIS purpose and need cannot focus on the fifth purpose to the exclusion of the other four.

The range of alternatives should include leasing alternatives that focus heavily on the original four purposes. The law requires offering for lease not less than 400,000 acres in each of two lease sales. The Tax Act requires that these be in the areas of highest potential for hydrocarbon production, but original ANILCA purposes require that this must be balanced by protecting the areas most important to wildlife and/or subsistence.

The Tax Act states the Secretary of the Interior may authorize “up to” 2,000 acres of development footprint. **A reasonable set of NEPA alternatives would start with the premise of examining a range, from authorizing the very smallest footprint on the Coastal Plain up to nearly the 2,000-acre limit, not various ways of authorizing 2,000 acres.** A development footprint of 2,000 acres would mean a sprawling network of roads, pipelines, and pads that could effectively blanket the entire 1002 area. I believe technology has advanced beyond that, and in this particularly sensitive area the leasing stipulations should reflect the very best methods for resource *protection*, even if they are slightly less efficient for resource *extraction*.

I have been on the ground in the refuge near the Canning River and in the more developed oil field areas farther west, and I have flown over these areas. I have seen that, in fact, nature will (slowly) reclaim old disturbed areas. Furthermore, from the perspective of a person walking on the ground, and because the area tends to be flat and gently rolling, old disturbed areas tend to be almost invisible until you are on them and will become less visible over time. This leads me to believe that it is possible to create a leasing program that presupposes that a completely wild area can be restored after the oil and gas are extracted. However, such an end result requires planning and substantial lease stipulations at the front end for a wild area that may not (re)occur for 75 years.

Looking to an end result that would revert the land to wild status requires that BLM, USFWS, the State, and the North Slope Borough not apply pressure or give in to pressure to create a permanent gravel road to connect the 1002 Area to Pt. Thomson's road or to connect to or near Kaktovik, because once the habit of road use is in place for a generation or more, it will become difficult to remove such a road. Ice roads should be able to serve most of the needs of the proposed oil and gas program and certainly can be the connection between oil and gas development on State lands farther west and development in the 1002 Area. Stipulations should require all above-ground development, including gravel pads, to be installed with the knowledge that they shall be removed when oil and gas extraction is complete. Wells should be sealed below the surface and nothing left above ground. Stipulations should state the land shall be restored to the extent possible using best practices available at the time of restoration. The terms of project close-out must not follow the State of Alaska model that suggests negotiation of restoration in the future; all development should be understood to be removed from the beginning.

If oil and gas development must occur, such development should be undertaken so that in the future the USFWS can manage the 1002 Area for its wilderness values, including habitat values, subsistence, and Wilderness Act values such as opportunities for solitude, challenge, and a visually natural environment. Congress or the USFWS could, now, establish a special designation for the 1002 Area requiring that it be returned to wilderness or near-wilderness status upon the completion of oil and gas activity so that everybody knew going in that this would be the goal. While my wish for the area is likely beyond the control or purview of the BLM Leasing EIS, **it is distinctly within the purview of the Leasing EIS to preserve this *potential* through the leasing stipulations.**

Leasing stipulations should include:

- Use of ice roads for most long-distance roads and specifically for any connection to existing infrastructure west of the 1002 Area.
- Full long-term foresight to the end of the project(s) life, requiring up-front the removal of gravel pads and all built infrastructure, and the closure and complete burial of wells.
- Limiting the term of leases reasonably and with coordinated dates among the two lease sales so that, regardless of terms for lease renewals or extensions, at some known point all leases are finished and the land can begin to revert to a natural state across the entirety of the Coastal Plain.

Other consideration for the EIS:

- Within the collection of lease areas, requiring the staggering of development by area and/or time so that Caribou, polar bears, birds, and other wildlife always have places of refuge within the 1002 Area.
- Reducing hydrocarbon consumption and greenhouse gas emissions on site by requiring oil and gas production facilities to employ alternative energy sources for light, heat, and industrial processes. Wind energy would appear to be the most obvious source on the Coastal Plain. This should be a win-win, as the oil companies would have more oil and gas to sell and could tout their “greenness” in their public relations. (Existing development in the greater Prudhoe Bay area reportedly produces more greenhouse gas emissions than most cities; let’s try to not repeat that in the age of climate change).

In short, any leasing should learn from the past, apply the very best practices, and look far to the future with the idea of returning the land to a natural environment—a natural and wild area used mostly by caribou and other wildlife, less so for traditional subsistence practices, and occasionally by trekkers and river floaters enjoying the quiet.

Thank you for the opportunity to comment.