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[EXTERNAL] EIS Scoping Comments

1 message

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Tue, Jun 19, 2018 at 5:45 PM

To: "blm_ak_coastalplain_EIS@blm.gov" <blm_ak_coastalplain_EIS@blm.gov>

Arctic NWR Leasing Scoping Comments attached



EIS Scoping Comments.docx

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Coastal Plain Oil and Gas Leasing Program EIS
222 West 7th Avenue, Stop #13
Anchorage, Alaska 99513

The following comments are being submitted as scoping comments on the proposed leasing EIS for the Arctic National Wildlife Refuge.

An overriding consideration when making decisions related to this EIS and resulting actions must be the fact that the proposed activity would take place within a national wildlife refuge. This cannot be minimized. The Arctic National Wildlife Refuge, like other conservation units be they state or federally designated, was not set aside until some future opportunity presented itself for development. In this case, the refuge was established (among other reasons) to maintain the natural diversity of fish, wildlife, and migratory birds that depend on it. This purpose does not vanish because of provisions in the Tax Act. The current purposes of the refuge must receive paramount consideration when decisions are made for activities taking place within its borders, including leasing and development should that occur.

Specific comments follow:

1. Decisions of the sort to be considered in the EIS cannot be done without taking into consideration the effect it may have on climate change. On the local scale, species that use the refuge coastal plain are already being affected by climate change. On a larger scale, the planet is threatened by the effects of a changing climate and the burning of additional oil and gas reserves – in this case from the refuge – needs to be addressed in the EIS.
2. It is stated in briefing materials provided that the surface disturbance from any development activities will be limited to a footprint of no more than 2,000 surface acres. The term “footprint” can be defined in more than one way and while the structures themselves, be they roads, drill pads, or pipelines may not exceed that amount, the impact from those activities will certainly have a much larger footprint. This needs to be addressed in the EIS as it relates specifically to the refuge purposes.
3. The EIS needs to address how the proposed action would affect the wilderness character of the region, both within the Arctic NWR and the larger ecosystem that includes protected areas in adjacent Canada. Wilderness recreation that includes opportunities for solitude is a significant use of the Refuge that includes the coastal plain. It is easy to quantify a given result (or decision) by simply using visitation numbers. As we know, visitation numbers to the Refuge are low compared to places like Denali or Yellowstone National Parks. But the EIS needs to address potential changes to the wilderness character of the area for the American public that values this component of our public lands, whether they visit the area or not. I have visited the area a number of times and I valued the undisturbed wild character of the area during those trips, but I consider it equally valuable to know that this portion of our country’s arctic coastal plain is undisturbed and undeveloped.

4. It is clear that oil and gas development in the refuge is a priority for the State of Alaska, the Alaska congressional delegation, and possibly even a majority of Alaskans. However, this is not a local or state issue. The Arctic Refuge is federally designated and held in trust for all residents in the country. Decisions made as the EIS progresses need to be made in the interest of all Americans and comments need to be considered and addressed accordingly.

Lastly, to be clear, I am a long-time Alaskan that is opposed to development of the coastal plain of the Arctic NWR. I am opposed for many reasons: impacts to wilderness character, impacts to visitors, impacts to wildlife and habitat, and impacts to our rapidly warming climate. However, I am also opposed for other reasons. I am opposed because we have already reduced our imports of oil from foreign countries significantly which reduces the need for development in such a unique place as the Arctic Refuge. I am opposed because we can achieve the same results by increasing our fuel efficiency standards for vehicles (which should be addressed as an alternative in the EIS). We have made progress in dealing with our energy needs in this country, though more needs to be done. There will be impacts as we deal with this on a national scale, but those impact choices need to be smart choices. Development of the coastal plain of the Arctic Refuge is not a smart choice. Please take all this into consideration in the scoping process for the EIS.

Sincerely,

Paul Liedberg
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