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**[EXTERNAL] Testimony for the record of BLM Coastal Plain EIS scoping hearings**

1 message

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**dwlevinemd@gmail.com** <dwlevinemd@gmail.com>

Mon, Jun 18, 2018 at 8:53 PM

To: blm\_ak\_coastalplain\_eis@blm.gov

Nicole Hayes

Project Coordinator

[blm\\_ak\\_coastalplain\\_eis@blm.gov](mailto:blm_ak_coastalplain_eis@blm.gov)

Dear Ms. Hayes,

Attached is a PDF copy of my testimony for the BLM Coastal Plain EIS scoping hearings. Please include my testimony in the official record of the hearings.

Thank you,

David W. Levine, M.D., M.P.H.

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[dwlevinemd@gmail.com](mailto:dwlevinemd@gmail.com)**Testimony of Dr. David Levine for the record of June 2018 BLM EIS scoping hearings.pdf**

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**Testimony of David W. Levine, M.D., M.P.H.**  
**For the Record of the BLM Hearings on the**  
**Arctic National Wildlife Refuge**  
**Public scoping period for preparation of Environmental Impact Statement (EIS) for**  
**Wildlife Refuge Coastal Plain oil & gas leasing program**  
**June 18, 2018**

My name is David Levine. I am submitting this testimony for the record of the EIS scoping hearings on my own and my family's behalf.

I have been involved in Alaska environmental and energy issues and the Arctic National Wildlife Range since 1975. I had the good fortune to live in Alaska for several years. I worked with the Alaska Coalition and the Sierra Club on the Alaska National Interest Lands Act (ANILCA) and Alaska energy issues, including route options for a proposed natural gas pipeline from the North Slope to the lower 48 states. I have travelled across the North Slope including the Arctic National Wildlife Refuge, Prudhoe Bay, and several parts of the National Petroleum Reserve Alaska. I have directly observed many of the ecological features that make the Arctic National Wildlife Refuge so unique and important. More recently, my personal connection to arctic issues in "The Great Land" has been vicariously through the eyes of my oldest son who serves as a crew member aboard an Alaskan oceanographic research ship. On expeditions studying the effects of global warming in the Arctic Ocean he has seen firsthand the impact of climate change on both the marine environment and the Alaska Native communities along the Arctic coast.

The Department of the Interior now faces a legally, morally and logistically challenging task in preparing an EIS to address potential oil and gas leasing in the Arctic National Wildlife Refuge. Outlined below are a few key points that I believe the BLM should address in the EIS preparation.

**The proposed EIS timeline is too short.** The BLM is proposing an abbreviated timeline that is inadequate to meet the requirements to fully study the comprehensive environmental impacts of development in the arctic refuge and to assess alternatives. This rushed process appears to be the result of "top down" politically motivated imperatives rather than sound "bottom up" detailed attention to scientific and cultural realities that the law and EIS process require.

Haste makes waste. It is instructive to remember the example of the original Trans Alaska Oil Pipeline EIS. The rushed, inadequate original EIS draft resulted in an injunction that delayed the Department of the Interior from granting the pipeline right of way. Although oil development proponents bitterly resented and opposed the delay, it resulted in a revised pipeline design that was better suited to Alaskan conditions and avoided some of the potentially catastrophic original plans. It also worth noting that notwithstanding the positive design changes during the injunction period, politics, time and the pipeline permitting process did not allow for serious consideration of an all overland route and simultaneous planning for a natural gas pipeline. As a result, Alaskans suffered, and continue to face the risk of, a marine oil

spill catastrophe and are still awaiting the economic benefits of a North Slope natural gas pipeline.

**The EIS should address the multifaceted aspects of climate change from both the perspective of how climate change may affect potential oil and gas development in the Arctic National Wildlife Refuge and how any such development may affect the climate.**

While it is commendable that Alaska's United States Senators and Governor acknowledge the reality of climate change, it is perplexing that they are proposing plans for the Arctic National Wildlife Refuge that exacerbate, rather than address, climate change. Among other values, the Arctic National Wildlife Refuge provides a unique laboratory to study an intact arctic ecosystem that is undeveloped.

Global warming is having significant impacts on thawing North Slope permafrost. To date, arctic construction best practices have relied on stable permafrost. Before authorizing any development in the Arctic National Wildlife refuge, the Department of the Interior should thoroughly research, understand and have a credible plan to address the impact of climate change on permafrost and arctic engineering practices.

**The EIS should rigorously and honestly assess the full impacts of industrializing the coastal plain.** The EIS should address what often seems to be some confusion between the methods and potential impacts of "oil exploration" versus "oil development." Proponents of opening the Arctic National Wildlife Refuge describe "winter only" "low impact" exploration. At best, they are often very vague about the potential impact of any subsequent oil development. At worst, they demonstrate wishful or "magical thinking" in describing "small footprint" low acreage development. Use of such terms are misleading and ironic. The "magical thinking" approach sometimes goes so far as to suggest that "we can have it all – wilderness, wildlife and oil development – no tradeoffs are necessary".

Unfortunately, oil development would entail extensive industrialization and wide-ranging impacts on the Arctic National Wildlife Refuge. The EIS needs to explicitly detail the full, wide ranging impact oil and gas development would have on the Arctic Refuge's coastal plain, especially the Porcupine Caribou calving areas.

**The EIS should include the alternative of no oil and gas development, consistent with the purposes and values of the Arctic National Wildlife Refuge and the 2015 comprehensive management plan and Environmental Impact Statement.** The case for protecting the Arctic National Wildlife Refuge and prohibiting oil development in the refuge's coastal plain is even stronger today than in the past. There is no economic, budgetary, national security, energy policy, environmental or scientific justification for a rushed process to open the wildlife refuge to oil development.

There are significantly better energy policy options for both Alaska and the nation outside the Arctic National Wildlife Refuge. In fact, there are so many better options that any

oil leasing in the wildlife refuge is likely to yield even less revenue than currently claimed projections. Risking the known Arctic National Wildlife Refuge values for uncertain and fleeting petroleum development revenue is a poor trade off.

In closing, I make note of a new term for an old, outdated concept that I have seen bandied about in press releases and testimony favoring oil leasing and development in the Arctic National Wildlife Refuge – “Energy Dominance.” The concept this term embodies appears to be that America should dig up and burn every fossil fuel it can find as fast as it can regardless of environmental, economic, social, cultural, health, political and climate costs. Such a policy is better termed “Energy Dumbness.” It would only delay transition to sounder, more sustainable energy policies and leave America and Alaska disadvantaged and behind other nations and regions.

A thorough, rigorous EIS on the proposed Arctic National Wildlife Refuge oil leasing and development has the potential to make these choices clearer and help inform a better policy. A rushed, superficial EIS would have the opposite effect.

Thank you for this opportunity to submit this testimony for the record.