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[EXTERNAL] Comment on the Draft Environmental Impact Statement for the Arctic National Wildlife Refuge

1 message

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Sat, Mar 9, 2019 at 8:52 PM

To: blm_ak_coastalplain_eis@blm.gov

Ms. Nicole Hayes,

"The opening of ANWR is projected to have its largest oil price reduction impacts as follows: a reduction in low-sulfur, light crude oil prices of \$0.41 per barrel (2006 dollars) in 2026 for the low oil resource case, \$0.75 per barrel in 2025 for the mean oil resource case, and \$1.44 per barrel in 2027 for the high oil resource case, relative to the reference case." - United States. Department of Energy. Energy Information Administration. Analysis of Crude Oil Production in the Arctic National Wildlife Refuge. SR/OIAF/2008-03. Washington, D.C.: GPO. 2008 (<https://www.eia.gov/analysis/requests/2008/anwr/introduction.html>)

So it's pretty clear that putting the reserves in ANWR into production will not be a game-changer in terms of the American economy.

At the same time the effects on the ecology of the region - and beyond - are subjects of speculation only, and will not be fully known until the extraction is complete. There is a not unreasonable expectation that they could be serious given that an unbiased reading of the history of environmental damage from hydrocarbon extraction shows that we are always playing catch-up, fixing each new flaw in our systems as it appears. The idea that we may eventually reach a point where there are no new flaws is hypothetical at best. See https://www.eia.gov/energyexplained/index.php?page=oil_environment.

Is it worth the risk?

The Draft Environmental Impact Statement fails to comprehensively analyze the impacts of oil and gas leasing in the Arctic National Wildlife Refuge, including transboundary impacts. The DEIS understates the importance of the Coastal Plain to the Porcupine caribou herd, and suggests that drilling would not cause the Porcupine caribou to decline. The review fails to acknowledge Gwich'in in Canada when determining what communities could be "appreciably affected" by changes to population patterns in the Porcupine caribou herd.

The U.S. Government must fully address the consequences of drilling on the Porcupine caribou herd and impacts to the livelihood of the Gwich'in who rely on the herd.

Thank you,

Gord Bradshaw
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