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**From:** Hayes, Miriam (Nicole) <mnhayes@blm.gov>  
**Sent:** Wednesday, March 13, 2019 8:06 AM  
**To:** coastalplainAR; Sean Cottle  
**Subject:** Fwd: [EXTERNAL] ANWR DEIS Comment-- omission of Tankers

**Nicole Hayes**

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----- Forwarded message -----

From: **Philip Wight** <[wight.phil@gmail.com](mailto:wight.phil@gmail.com)>  
Date: Tue, Mar 12, 2019 at 9:29 PM  
Subject: [EXTERNAL] ANWR DEIS Comment-- omission of Tankers  
To: <[mnhayes@blm.gov](mailto:mnhayes@blm.gov)>  
Cc: Ryan Marsh <[ryan@northern.org](mailto:ryan@northern.org)>

Hello,

My name is Philip Wight and I'm an Environmental Historian who has studied the history of the Trans-Alaska Pipeline System and the Arctic National Wildlife Refuge for the past five years. My research focuses on the cumulative environmental effects of oil drilling on Alaska's North Slope.

The DEIS is deficient in several respects. First, it fails to recognize that drilling in the coastal plain of ANWR is fundamentally linked to the Trans-Alaska Pipeline System (TAPS) and its ecological influence. While the DEIS notes, "Oil would be transported to market by a connection to the TAPS" (3-38), it does not explore the environmental influence of extending the economic life of TAPS. The DEIS makes clear that "Any additional oil production in the North Slope extends the life of the TAPS and increased revenues for the State" (3-237). If TAPS endures an extra four or five decades, how much induced drilling on the North Slope will this enable? If the DEIS recognizes the economics of extending the life of TAPS, why does it not consider the directly-related environmental impacts of this as well? The DEIS concludes that "The Coastal Plain production could extend much longer than 37 years, perhaps from 50 to 100 years; 70 years is assumed for purposes of making annual GHG projections for this Leasing EIS" (3-6). The DEIS seems bias towards economics gains while neglecting environmental impacts. What are the long term environmental impacts of extending the life of TAPS?

Most critically, the DEIS neglects any mentions of tankers in Prince William Sound, the Gulf of Alaska, or the West Coast of the United States. Moving oil by tanker is the only way to export ANS crude once it travels through TAPS to Valdez. Between 1977 and 2019, over 14 million gallons of crude were spilled in tanker accidents from Prince William Sound (namely the *Exxon Valdez* and other spills) to the Puget Sound, to Southern California and Panama. The DEIS makes no mention of these "downstream" ecological effects, even though they are fundamentally linked to TAPS and

drilling on the Coastal Plain. This is a major omission that obscures the environmental impact of drilling in the Arctic Refuge. How would drilling on the Coastal Plain effect the frequency and destination of TAPS tanker trips? How would this movement impact the coastal ecosystems of Prince William Sound and regular TAPS tanker destinations?

Furthermore, the methods employed by the DEIS in calculating cumulative carbon emissions-- both in terms of upstream development and emissions from consumption--relies upon flawed methods and analysis. The analysis must consider how the extra potentially billions of barrels of oil will induce demand and cause emissions beyond the baseline status quo. The DEIS must include a comprehensive analysis of extra greenhouse gas emissions that will result from both upstream development and downstream demand.

Finally, the DEIS neglects to mention the environmental impacts of the field after oil development is completed. Who will pay for cleanup? How will drilling muds and toxins be removed? What will be the impact of these developments on the long term ecology of the region?

These major omissions make the DEIS significantly less credible and accurate. Including the relevant information would provide a much clearer understanding of the environmental impact of this project.

Philip Wight