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Attn: Coastal Plain Oil + Gas Leasing Program #15  
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## Arctic Refuge Comments

Jenna Jonas, 2240 Railroad Drive Fairbanks Alaska 99709

I find all of the alternatives presented in this EIS to be grossly incompatible with the original purposes of Public Land Order 2214 and the Alaska National Interest Lands Conservation Act. Those purposes are:

- (i) to conserve fish and wildlife populations and habitats in their natural diversity;

Oil and gas development has been detrimental to fish and wildlife populations across the North Slope. I am particularly concerned about impacts of ice roads on fish such as grayling and dolly varden, seismic equipment on sensitive denning polar bears, and habitat for migratory birds. Polar bears, specifically are threatened by the alternatives presented in this DEIS as Polar bear critical denning habitat constitutes 77% of the program area (Vol 1, p. 3-133) and maternal dens are disproportionately high in high hydrocarbon potential zones (Vol 1, p. 3-134). The DEIS acknowledges that "the potential for injury or mortality could be high when developing new oil and gas projects in polar bear habitat." (Vol 1, p. 3-142) Nevertheless, there is no estimate of the number of bears that could be killed, injured or displaced by the leasing process or seismic testing. The Coastal Plain is a nursery for the Porcupine Caribou Herd and millions of migratory birds. Oil development elsewhere has proved disruptive and these species are already threatened by climate change. Cumulative impacts need to be considered.

Oil and gas development carries the risk of oil and gas spills, which would be all but impossible to clean up in the arctic and detrimental to the fish and wildlife that this area was set aside to conserve. According to Center for American Progress, oil fields on the North Slope have averaged more than 400 oil spills per year, and across Alaska, there were 16 major spills from 2002 to 2016 that released at least 10,000 gallons of oil into the environment. Five of those spills released more than 100,000 gallons of oil. This is contradictory to the DEIS's estimates of oil spill frequency.

The value of having such a large piece of wilderness is that fish and wildlife have unrestricted access to all of it, as they have since time immemorial.

- (ii) to fulfill the international fish and wildlife treaty obligations of the United States;

Oil and gas development would threaten the treaty that the US and Canada have related to managing and protecting the Porcupine Caribou herd. This plan fails to meet our treaty requirement stated in E100687 - CTS 1987 No. 31 that "The Parties should avoid or minimize activities that would significantly disrupt migration or other important behavior patterns of the Porcupine Caribou Herd or that would otherwise lessen the ability of users of Porcupine Caribou to use the Herd."

- (iii) to provide the opportunity for continued subsistence uses by local residents;

Oil and gas development would directly threaten the porcupine caribou herd utilized by the Gwich'in people for subsistence use. The Gwich'in are united in their opposition to the alternatives presented in this plan.

- (iv) and (iv) to ensure water quality and necessary water quantity within the refuge.

Oil and gas development is water-intensive. It will require the diversion of water and construction of ice roads. I work as a wilderness guide floating the rivers that cross the Coastal Plain and know from

experience that water on the Coastal Plain of the is particularly scarce. There are few open lakes and rivers and very little water available. The BLM does no new analysis of how much water is actually available on the Coastal Plain and therefore does an insufficient job of analyzing impact to that water quantity. The DEIS estimates that drilling each well requires 420,000 to 1.9 million gallons of water. All of the alternatives have at least 17 'satellite pads' and 1 anchor pad. (Volume 2, Table B-5). And the DEIS estimates that 30 wells will be drilled from the average pad (Volume 2, B-17). So at least 540 wells would be drilled, requiring a total of between 227 million and 1 billion gallons of water just to drill the wells. In addition, every mile of ice road requires 1 million gallons of water (Vol. 2, B-13), each ice pad requires 500,000 gallons of water (B-12), and daily production of 50,000 barrels of oil would require 2 million gallons of water per day. All this in an area that receives less than 5 inches of water annually. The DEIS does not meet the requirement to ensure water quality and quantity.

In an effort to meet the one new requirement put forth by the Tax bill, this plan fails to meet the other four requirements that the refuge was established to protect. This is not how it should work.

The DEIS does not provide a balanced range of alternatives, it provides a only very development-focused options and no conservation-focused ones. BLM is also only counting 2000 acres "at any given time" (Vol 1, p. 3-221). This means that any land that is "reclaimed" can be deducted from the 2000 acre cap and credited toward more development. This rolling cap interpretation would allow for the entirety of the coastal plain to see the impacts of development over time. is also only counting 2000 acres "at any given time" (Vol 1, p. 3-221). This means that any land that is "reclaimed" can be deducted from the 2000 acre cap and credited toward more development. This rolling cap interpretation would allow for the entirety of the coastal plain to see the impacts of development over time. In addition, the alternatives presented far exceed the amount of acreage mandated by the Tax act.

I also do not believe that the public process for this EIS meets the requirements of NEPA. I attended the public hearing in Fairbanks and was appalled at the way it was conducted. The public were not given the opportunity to speak, much of what was said was not recorded, and it failed to meet the minimum requirements of an EIS process. The plan has been rushed- Congress authorized four years before the first mandated lease sale, but BLM and the Dept. of Interior are rushing to hold lease sales within a year. The DEIS sacrifices quality for speed.

I believe that any of the alternatives presented would be disastrous to the Arctic Refuge, its plants, animals, people, and our climate-change stressed planet as a whole. It is the wrong choice and the wrong process. I do not like any of the alternatives presented but of the options given, I would choose D.