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Bureau of Fuel Management
Alaska State Office, Attention
Central Plains EIS
222 West 7th Ave # 13
Anchorage, AK 99513-7599



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January 25, 2019

Bureau of Land Management	Senator Lisa Murkowski, Chair	Senator Joe Manchin
Alaska State Office, Attention	Natural Resources Committee	Natural Resource Com.
Coastal Plain EIS	522 Hart Senate Office Bldg	306 Hart Senate O.B.
222 West 7 th Avenue, #13	Washington, DC 20510	Washington, DC 20510
Anchorage, AK 99513-7599	And Others	

Comments on DEIS:

I oppose allowing Oil and Gas Leasing. Seismic Operations and Drilling in ARTIC National Wildlife Refuge and anywhere in the Atlantic Ocean or Gulf of Mexico

The **Trump Administration** and his cronies hurriedly passed their tax bill and are now rushing to get the EIS process finalized, so they can acquire drilling leases on federal lands in the **Artic, Atlantic Ocean and Gulf of Mexico**, before 2020. The Trump group is in a race against the political clock, trying to get oil and gas leases before a new administration takes office.

Trump completely ignores the fact that **severe climate changes** and **sea level rises do exist and are occurring** in all coastal areas. He blatantly refuses to recognize these problems exist and promotes opening new areas for oil/gas development without regard for consequence. He cares nothing for the environment, has eliminated proper funding and staffing for EPA and environmental agencies and seems callous and disregarding when it comes to protecting wildlife or human lives. He's trying to eliminate the first environmental laws and is placing us all **in jeopardy**. Other world leaders are using more enlightened, forward thinking alternatives and considering alternative energy sources. Why can't we have a leader who does the same for this great Nation?

The National Environmental Policy Act (NEPA) was passed in 1970 and its **Preamble** reads: "*To declare national policy which will encourage productive and **enjoyable harmony** between man and his environment; to promote efforts which will prevent or **eliminate damage** to the **environment and biosphere** and **stimulate the health and welfare** of man; to **enrich** the understanding of the **ecological** systems and natural resources **important** to the **Nation**; and to establish a Council on Environmental Quality*".

The NEPA was the first environmental law to truly involve the public in the permitting process and helped save and protect natural systems and lives while developing federal projects. On August 15, 2017 Trump issued Executive Order 13807 "*Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure Projects.*" This executive order directs CEQ to use its "*authority to interpret NEPA to **simplify and accelerate** the NEPA review process,*" requires agencies to "*establish procedures for a regular review and update of **categorical exclusions***", and

revokes President Obama's Executive Order 13690 that increased Flood Risk Management to include the **science on climate change**. Consequently, CEQ published an advanced notice of proposed rulemaking "*Update to the Regulations for Implementing the Procedural Provisions of the NEPA*." However, an August 10, 2018 response comment letter points out:

CEQ's Advance Notice states that regulatory changes are being considered to "ensure a more efficient, timely, and effective NEPA process." As detailed below, this justification ignores the reality that NEPA's existing regulations already allow for significant efficiency and timeline. For example, existing NEPA regulations direct federal agencies to reduce paper work, reduce delays, provide for tailored time delays, provide for scoping that identifies the issues requiring detailed analysis early in the process, integrate and prepare NEPA reviews concurrently with other required reviews and eliminate duplication with state and local procedures. CEQ should focus its efforts on better enforcement of existing regulations, improving training for agency staff and NEPA practitioners who are unaware of available tools, and expediting procedures in existing NEPA regulations."

The NEPA process has always required that a proposal must be justifiable and have a **NEED** for using federal monies and staff in a federal project, but if it poses "**significant threats to the environment or human life on this planet, an overall Environmental Impact Statement(EIS) is required and in many cases the horrible project was denied.**" The Trump proposal to open up and destroy the Arctic National Wildlife Refuge certainly applies, so let's hope the BLM legally removes these areas...the Arctic, the Atlantic and Gulf of Mexico, as there is no NATIONAL NEED, because the oil is going to be exported—probably to China and Russia.

These are excerpts taken from scientists that have spent extensive time exploring the Arctic Refuge's wild lands and coastal plains: John Schoen, Rosa Meehan, Jeff Fair, Steve Zack, Martha Reynolds, and Daniel Taylor and identify their extremely strong reasons for **removing the ARCTIC Refuge** from the proposed list.

- 1) *The **Arctic refuge** contains 19 million acres and one of the most undisturbed landscapes in the U.S....it's one of the most significant wilderness areas left in the U.S. , if not North America and **functions ecologically** much like it did **hundreds of years ago**...*
- 2) *it's where the mountains come close to the sea...there is this compression of different landscapes coming together...: mountains, foothills, a little bit of coastal plain, lagoons, barrier islands ...a tremendous landscape diversity... providing a travel corridor for the caribou*
- 3) *In 2005 it was targeted for oil development...you cannot walk up there without scaring up birds from their nests- a sponge of **sandpipers... ducks, loons** and quite a few other species...during September migration saw and heard thousands of **White-fronted Geese** cackling like a bunch of school girls and the next day the grass was empty...the Snow Geese from Canada feed, and power up for their long flight for winter migration*

- 4) the coastal plain is a very narrow belt of land compared to Prudhoe Bay and the key point is the **compression of habitat** where the Artic Refuge is ...there are caribou, migratory birds, grizzly bears, wolves and polar bears...if you overlay that land with oil development, infrastructure of airfields, gravel roads, pipelines and pump stations ...there **isn't any place** for the animals to go.
- 5) there were **five well pads** in Prudhoe Bay...in 30-40 years there were hundreds of well pads that covered phenomenal amount of area...having an oilfield in place **changes the landscape**...the various structures that tie the well pads together can act as barriers and diversions for animals and birds
- 6) **development** brings increasing numbers of **nest predators**...Arctic fox use structures for denning their young and are predator of **bird eggs**...All birds in Arctic breed on the ground ...there are no vertical structures...and are vulnerable for **fox** and other predators like **ravens** ...very effective nest predators leads to decreased nesting success for the birds
- 7) ANWR is a vast road less tract, home to migrating **birds**, large nomadic porcupine **caribou** herd and winter dens of pregnant polar **bears**...mountains come close to the sea
- 8) The Arctic is only place **migratory bird breed**...if this refuge is changed it could have cascading effects on population numbers ...the Arctic isn't an isolated place, it's really a connected place because of the movement of birds and mammals from all over the planet...developing their nursery or breeding grounds will have connected and dramatic effects elsewhere
- 9) The **porcupine caribou herd** is one of the largest herds in Alaska...in the summer they give birth... mostly in the coastal plain of the Arctic Refuge...in past 30 years they've calved three times in Canada and mortality is higher...The Arctic Refuge holds the **highest nutritional quality** of their food
- 10) **Plants** on coastal plain draw the **caribou to calve** ...it's the **tundra** community there and early **flowers**, provide food...they also eat **lichen, moss**, the **poppies** and other various flowering plants that pop up in the spring...there's a **direct link between the health of the landscape and the health of the caribou**—and all other critters that live up there
- 11) When the **caribou move** through, all the **predators move** with them. Bears and wolves follow them. It's a seasonal movement of animals and it's tremendous because of the landscape
- 12) In ecology **nothing exists in isolation**...caribou depend on lichens in the wintertime and cotton grass in the summer...caribou die or are killed, wolves or grizzly bears have first pickings-then the wolverines scavenge the carcasses and all the smaller organisms get in and chew on the bones and the nutrients left behind, You have these **interconnections and dependencies of different creatures that we forget about**
- 13) At **Prudhoe Bay** there are no lichens...mosses are **different**...plant communities have **changed**...**only the hardy survive**...even between the pipelines, the roads, and drills ...at a very fundamental level it causes **changes that last** for hundreds or thousands of years
- 14) Research looked at **populations** of the central arctic herd which **calves at Prudhoe Bay**...discovered the females and calves were **displaced** by **roads and pipelines** and as the oilfield **infrastructure** increased...the caribou that were displaced had lower birth

weights and **higher mortality** than the portion of the herd that didn't have oilfield infrastructure...scientific evidence was clear that an **oilfield development** like in Prudhoe Bay moved to the Arctic Refuge **would have adverse impacts on caribou**

15) **Gwich'in native people**... "the caribou people" rely primarily on wild caribou for a **major part** of their **sustenance**, going back thousands of years. Their **cultural** survival and **self respect** is at stake because of their close **ties** to the porcupine **caribou herd**. It's not just wildlife or bird issue; it's a **people issue** with this very important **minority group** in America

Another important Note: The NEPA promotes **environmental justice** by requiring federal agencies to **include minority and low- income populations** in their NEPA-mandated environmental analysis. Executive Order #12898 requires federal agencies that are complying with NEPA to consider environmental effects on human health, and economic and disproportionately impacted by environmental detriment. Proposed federal actions must address "significant and adverse environmental effects" on minority and low-income populations.

16) **The Arctic is changing more quickly than any other landscape on the planet** because of **climate change**. More development will **further stress** Arctic wildlife and resources... Arctic conditions is moving away from such conditions into **more boreal-like climates**, bringing boreal animals further north and **crowding out animals** that are truly Arctic only: that huge assemblage of migratory birds that nest there in the winter, caribou herds, musk ox, polar bears ...You **add more development** ...you add **more stress** to a system in one of the **most beautifully singular places on the planet**.

17) In the last 30 years the **sea ice has moved northward**... **polar bears** are increasingly **denning on land** and has accelerated in the last 10 years...most important onshore denning area in Alaska, based on numbers of dens is the **Arctic Refuge** coastal Plain

18) The southern **Beaufort Sea** population of **polar bears** is showing a lot of population **stress**...the **young** are not surviving...females reproduce, but the bears aren't making it to two or three years old—**no new bears** entering the population...an oilfield will increase the problems...it will **increase the conflicts** and be difficult to manage

19) The **Arctic Refuge** is a place far away from the normal hustle of life...it is **timeless** and **vast**...while there you feel **more connected** to the **rhythms of life** that go beyond our daily routine ...great **processions** of **caribou** trace steps they have followed for **millenia**. Shorebirds in their **finest breeding plumage** on their nest raising the next generations of young , having flown thousands of miles...**predators pursuing prey** **surviving in a place of remarkable beauty and aloneness** ...**We need these places...** the visits have enriched my life knowing it exists **as it was and should continue to be**.

NO DRILLING IN THE ATLANTIC OR GULF OF MEXICO

There should be **no more drilling allowed** in the Atlantic Ocean or the Gulf of Mexico, as there has been enough catastrophic destruction from drilling operations, especially in the Gulf. If you haven't read Wikipedia's 62 pages on the Deepwater Horizon Oil Spill ... then do so, as they will make the hair on the back of your necks rise to attention.

Also read my "Chronicle of An Eco-Warrior-Relating South Alabama's Environmental Issues." It is available on Amazon. The information in the attached pages from the

'Chronicle' relate quite a bit more information than what is written in the Wikipedia article on why the U.S. Department of Interior's "**Minerals Management Service** (MMS) was dissolved, after it was determined it had exercised poor oversight over the drilling industry, and three new agencies replaced it."

Does the BLM's EIS report the true dangers and risks of drilling operations in a sensitive area, such as occurred in the Gulf of Mexico, from the huge irresponsible, destructive and criminal BP/Amoco/Transocean/Halliburton's oil platform blowout, that occurred on April 20, 2010. Over 210 million U.S. gallons of oil was spilled and was "considered to be the largest marine oil spill in the history of the petroleum industry and estimated to be 8-31% larger in volume than the previous largest, the Ixtoc I oil Spill, also in the Gulf of Mexico." Eleven men were killed and it came close to wiping out "one of the most productive oceans ecosystems in the world." It was supposedly stopped, but was reported to **still be leaking** in the Gulf in 2012!

The unsightly oil was 'bad publicity' so BP decided to dump over 1.84 million gallons of the toxic Corexit dispersant into the ocean to sink the oil and both the Corexit and Oil mix spread through out the ocean waters and covered the bottom for years. The mix has caused fish deformities, heart problems in fish and possibly humans and numerous dolphin deaths.

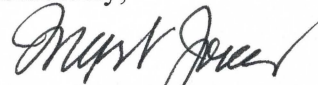
The five coastal states along the Gulf of Mexico's oiled waters covered sensitive marshy areas and the deadly mess decimating the vegetation, killed and contaminated birdlife, marine and wildlife.

In July 2010, President Obama issued an executive order and established the National Ocean Council, which included a number of federal committees and departments engaged in ocean issues to work together with a newly established committee, for conservation and resources management. In June 2018, the executive order establishing the National Ocean Council was **revoked by President Trump** in an effort to **roll back bureaucracy** and "benefit ocean industries?"

No-one knows to what degree the ten thousands drilling rigs and their associated facilities impacts have done to the Gulf, from their numerous releases of greenhouse gases and oil releases into the air and water systems?

Another BP/Transocean -type oil spill could wipe everything out before we ever properly learn what **exists in the Artic depths**. The FEIS should be **held in abeyance**, until this **new underwater world is completely evaluated** and processed or otherwise **BLM will be violating the law** of the Land!

Sincerely,



Mrs. Myrt Jones
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Mobile, Al. 36695
251-454-3398

Attached Pages from Chronicle regarding what MMS was doing with BP

now threaten our only water supply. I believe that Chevron's spill on Blakeley in the 70's was the largest!

My first appearance as a gadfly, after a ten year hiatus, was before the Water and Sewer Board on July 2013 and presented Plains abysmal track record. Then suggested the Board require a \$25 billion dollar bond from the company, to discourage them from placing their pipeline through the watershed, as spill cleanups were now costing billions to clean up.-They didn't.

During March 2014 the MAWSS lost their imminent domain court case with Plains and received 2.7 million dollars. I don't understand that either? They signed a document where they would not pursue legal actions, if and when the company fouled our water supply. Their attorney told them they should just give up-that's when he would have been replaced by me and hired another attorney. Thirty pieces of silver was the going rate in biblical times, now it only costs \$2,7 million to sell out people's lives and livelihood by the 'wimps' in power. Unbelievable

Our problems continue, The Planning Commission, members of the City Council and our Mayor lost their minds completely, or became GREEDY. Of all things to consider passing was a Zoning Ordinance for the city of Mobile, that hadn't been on the books 'ever,' to '**rubber stamp storage tank cities**' and locate tar sand storage tanks everywhere--in the floodplains, wetlands, historical neighborhoods, expensive river and bay front lots-to hell with the environment and people rights. Citizens finally said 'NO', and the Council decided they would place a six month moratorium on them. Mayor Sandy Stimpson said, "a moratorium would send out a bad message to the business community and they would not come." At the public hearing strangely enough the Chamber of Commerce said exactly the same words. 'Is the Mayor a puppet for the Chamber?' When it came my turn to speak I called them '**our enemy.**'

The **Port of Mobile** already has ARC Terminals, Hunt Refining, American Tank & Vessel, World Point Terminals, Plains, and other unidentified storage tank farms overwhelming the City of Mobile's beautiful historic small business community with the conservative estimate of multi- billion gallons of hydrocarbons and mixed chemicals, most of which are now tar sands and sulfuric acid. Many of our short sighted rich promoters have always wanted this area to be another Houston-why didn't they just move there?

MINERALS MANAGEMENT SERVICE - MMS

All of those years of reading numerous EIS's I would questioned whether MMS was violating the NEPA process and working too closely with the oil industry-it finally came out they were doing just that.

These are quotes on the Internet in February 2014: "The MMS: Bad Science in The Name of Private Interests" by the Union of Concerned Scientists 3-23-2012;

"MMS circumvented science and suppressed the opinion of scientists concerned about the environmental impacts of drilling. On April 6, 2009, MMS granted BP's lease at Deepwater Horizon a "categorical exclusion" from NEPA essentially exempting the proposed action from a detailed EIS"

"Along with BP there were the granting annually of approximately 250-400 other "categorical exclusions" and MMS certified that BP and the others were expected to have "no significant individual or cumulative effect on the quality of the human environment -for the Gulf of Mexico drilling projects"

"The rash of waivers is a system of MMS's long-standing deference to industry wishes and expertise--specifically allowing the regulated

industry to determine whether further environmental assessments (EA) are needed.”

The Department of Interior, MMS responsible for leasing and overseeing offshore drilling in the Gulf of Mexico came under ethical scrutiny for its involvement in:

“Multiple scandals involving employees’ cozy relationships with oil company individuals”

“The agency’s acceptance of financial favors, drug use and rampant conflict of interest”

“The agency’s extensive history of suppressing science and evidence of scientific manipulations such as rewriting a draft version warning that “a massive spill could easily turn out to be a potential show stopper or seafloor blowout”

“questionable granting of wholesale “categorical exclusions” violating NEPA in underestimating or ignoring environmental impacts in order to not be required to do an EIS and ensure the speedy approval of oil industry project”

“allowing the regulated industry to determine whether an Environmental Assessment (EA) or (EIS) is required as MMS forms a decision based on the oil industry’s information”

“recycling old data from previous EIS’s in order to avoid a finding of significant adverse impact as by law a full EIS for that sale would add months or years to work the permit process”

“in bypassing mitigation considerations MMS has a record of direct manipulations of scientific results presented in its official documents. In several cases MMS directed scientists to exclude analysis that found harm to wildlife from oil exploration activities.”

(MMS internal email released by Public Employees for Environmental Responsibility (PEER) Jan. 2008)”

“deleting former MMS biologist Jeff Childs June 2006 warning that bringing in vessels, rigs, platforms etc. to Alaska from outside are likely to introduce invasive species that “may well yield much greater significant adverse effects than a large spill” (A March 2010 report by the General Accounting Office (GAO) confirmed Child’s analysis were deleted from a 2006 environmental assessment. He was removed from the invasive species as wouldn’t implement the agency policy.)

“Child’s wrote how “Exxon Valdez spill had harmed generations of fish in Prince William Sound and reported a large spill would be likely to result in significant adverse effects on local populations requiring three or more generations to recover.”

“Ignoring the importance of “significant adverse effects” as it can” trigger the need for an EIS and additional consultation with the National Marine Fisheries services as they implement the Endangered Species Act (ESA) for marine species and mitigate measures to minimize harm to the habitats of endangered species.”

“(Alaska’s MMS Regional Supervisor wrote-”A conclusion of significant adverse effects “under NEPA would require an EIS and delay in Sale 202 and would not go well with HQ and others.”

“MMS accessed environmental impact of drilling in our Central Gulf of Mexico on 3 occasions in 2007, including BP’s Lease-none of them accurately documented the effects of a major blowout as they underestimated the potential size of one like Deepwater Horizon by at least 280 times using the most “conservative government estimates.”

"On May 14, 2010, the Center for Biological Diversity threatened to sue DOI, saying Salazar became director and had approved 3 lease sales, 100 seismic surveys and given over 300 drilling operations without permits, violating the Marine Mammals Protection Act (MMPA) and ESA, which protects whales and other marine mammals."

"Given the size and scope of the Deepwater Horizon disastrous oil spill, that dwarfs the Exxon Valdez spill by seven times, and expected to have catastrophic environmental consequences for years into the future, and the fact that MMS placed a categorical exclusion on the lease seems tragically short-sighted at best and deliberately negligent at worst."

"A week after the BP's blowout, Mary I. Kendall, acting inspector general for the DOI, quietly released a report recommending DOI adopt a scientific integrity policy. "The DOI has never had, and currently operates without, a scientific integrity policy and has neither a system for tracking potential scientific misconduct, nor rules that ensure such misconduct could be punished. Without sound policies to protect the scientific community and general public from potentially flawed scientific research data, and publications, interior's reputation and its public trust are at risk."

As one who has read the questionable EIS's since 1971, I wonder who is responsible and accountable in our government and why did it take so long to gather this material?

THE ELECTRIC CAR

In 1996, Saturn distributed the General Motors *electric* car.

California's Resources Board had adopted the mandate of zero emissions, because they had the worst air pollution and smog problems in the Nation. Their children had a higher incidence of asthma, cancer and lung developmental problems than any other

state. California adopted the mandate of zero emissions pressuring the car manufacturers to meet this standard in their state. General Motors took on the challenge with their electric car.

The EVI was fast, sporty, quiet and a joy to drive and on a home charge a person could drive it 100 miles. In 2006 all of the cars were collected and shredded and it is thought that General Motors, the oil industry, and politics, joined forces to halt progress against something which would impact their profits. The documentary, "*Who killed the Electric Car,*" tells the full story- if you can find a copy.

Congress should be required to adopt a clean alternative energy program. Conservation and recycling should become a part of everyday life. These actions would hopefully provide protection for our human and natural world, supply clean energy sources and industries and therefore jobs and cut down on pollution loads and threats to human health.

Global climatic changes along with sea level rise are occurring, because of the release of hydrocarbon gases from internal combustion cars, burning of coal in power plants and many other sources. European countries are already into the twenty-first century using innovative alternative clean energy and making a difference. The United States continues to be doing business "as usual."

ALTERNATIVE ENERGY

British Petroleum's catastrophic oil blowout in our Gulf of Mexico points out the urgency for this Nation to adopt a clean, renewable energy policy using wind, solar, waves; whatever can be utilized and quickly. The following information was taken from the Internet and shows how other countries are recognizing the urgency to use clean energy sources in order to be carbon free. There are, of course endless internet sites the reader may consult to learn more: