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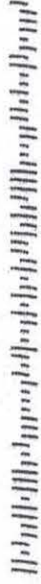
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Attention: Coastal Plain Oil: Gas Lease Program EIS

222 West 7th Stop #13  
Anchorage, AK 99513

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March 3, 2019

Attn: Coastal Plain Oil and Gas Leasing Program EIS  
222 West 7<sup>th</sup> Ave, Stop #13  
Anchorage, AK 99513

Dear BLM DEIS Project Evaluators:

Thank you for taking public comment.

This project is complex, and it is so important to many Americans. Very little time for public comment has been allotted and very little time for BLM analysis. The month long federal shutdown cut into the work time of BLM staff, and Alaskans and other Americans could not reach BLM with questions about the DEIS. The Trump Administration has sadly applied a one-year time limit to the EIS contractor. That is blatantly an undemocratic way to steamroll this controversial project. Some US senators have asked for much more public comment time.

Here are some deficiencies in the DEIS:

Alaska's climate is changing and warming at twice the rate of the Lower 48. This DEIS does not address the dangers to Alaska posed by oil/gas development in ANWR and how it adds to statewide climate deterioration. Huge omission.

As a family physician, I took a lifetime oath of "Do No Harm." When I look over the DEIS, I see harm to the Gwich'in, to Coastal Plain animals, to the water quality and quantity, to the land and air and warming planet, which includes sadly our Alaska baking away in higher temperatures. The DEIS must address these potential harms.

Large amounts of black carbon from combustion will be added to the atmosphere during the ANWR development phase. The DEIS does not mention this. And if all the oil extracted is burned, how can the planet atmosphere handle these harmful compounds? The DEIS does not mention this worldwide impact.

Water Quality: the DEIS does not talk about all the critical impacts to water quality and water quantity. Water is scarce in the Coastal Plain especially in winter. Ice roads require lots of water, a million gallons for every mile. Each ANWR well will require 500,000 to 1.9 million gallons of water, and each pad will likely drill 30 wells. Likely 540 wells will be drilled in the Coastal Plain. The DEIS does not discuss impacts to streams, rivers, and springs and consequently the fish and wildlife. As a physician, these are important issues to address.

The Refuge designation for ANWR through ANILCA specified that water quality and water quantity be protected as a way to conserve ANWR wildlife and fish habitat. I wonder if this lease sale can adhere to ANILCA. The DEIS does not sufficiently analyze impacts to water. How can the EIS be legal and binding?

There is no map to show the public the amount of land that might be maximally included with each acreage alternative. And the amount of land is confusing. There is also no discussion of trying to use less land.

The discussion of the 2000-acre rule seems designed to mislead the public. Because the Tax Cuts and Jobs Act of 2017 stipulates a maximum of 2000 acres in the Coastal Plain, it is misleading to read that ice roads and pads, elevated pipelines, and gravel mines do not count as surface disturbance and therefore are not considered part of the 2,000 allowable acres. This reads like a PR ploy.

And it is odd for the general public to read that gravel mines do not count as infrastructure even though they supply the raw materials for oil/gas development but do not count in the 2,000 acres. Having seen a lot of gravel pits in Juneau, they create a lot of surface disturbance and can affect water quality and are not always easily reclaimed. This is a worrisome DEIS deficiency.

Another confusing or possibly misleading detail about the 2000-acre rule is the phrase that the 2000 acres will be counted "at any given time." It appears that the 2000 acres could be rolling, if some acres are "reclaimed or mitigated." Can impacted areas be subtracted from the 2000 and oil/gas development? Who inspects for mitigation and repair? The oil company contractor with deadlines and profit margins, is this the inspector? This appears to give contractors undue sprawl capacity and likely, over time, construction and damage could possibly impact the whole Coastal Plain.

This "at any given time" detail appears to provide great flexibility to oil contractors in terms of what acres will be counted and when and what is truly reclaimed?

The DEIS also greatly understates the risk of oil spills. As a long time Alaska resident, oil spills are announced all the time. Some reports say that there are often 400 a year. Even if the large spills over 100,000 gallons are rare, any spill causes irreparable harm to fragile arctic habitats and eco systems. Oil spills do not belong in refuges. Because spill repair is not profitable, and crews can easily get weathered in and unable to travel to remote spill sites, oil oozing away in the arctic is much more harmful. And how do oil companies prioritize unprofitable work?

As a physician I am alarmed that so much ANWR damage could be done away from the public eye.

Caribou, denning polar bears, migrating birds, fish and other wildlife – many scientists have posted their findings and analyses: oil/gas development will harm all these forms of life in the fragile and unique Coastal Plain. These findings are not addressed in the DEIS.

When I visited the Gwich'in, the Porcupine Caribou people, they were all opposed to this project. It will jeopardize their livelihoods, their cultural rights and human rights. They have been clearly speaking out against ANWR development for decades. They are

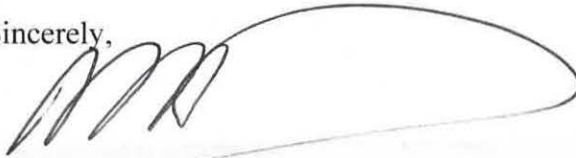


doubly harmed by not seeing their voices reflected in this DEIS. Gwich'in voices are not honored. Classic disregard of Native people. I would say they are being re-colonized by corporations and profit-seeking. ANILCA promises on the chop block.

The oil/gas development harm to the Gwich'in, their culture and the land they have cared for is extremely important for the DEIS to address.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to be 'ML', with a long, sweeping horizontal line extending to the right.

Maureen Longworth, MD  
Alaska resident since 1993  
PO Box 21084  
Juneau, AK 99802