

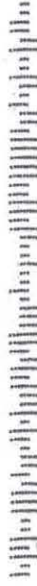
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March 11, 2019

Nicole Hayes
Bureau of Land Management
Attn: Coastal Plain Oil and Gas Leasing Program EIS
222 West 7th Ave. #13
Anchorage, Alaska 99513
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Dear Ms. Hayes and Whom It May Concern,

Thank you for this opportunity to comment on the Coastal Plain Oil and Gas Leasing Program EIS.

I am writing to express my significant concern with the prospect of conducting exploration and development within the Coastal Plain of the Arctic National Wildlife Refuge, as well as the inadequate analysis being used to evaluate the potential for significant adverse environmental impacts within the Coastal Plain and the larger international ecosystem inclusive of the Arctic National Wildlife Refuge.

I base my concerns upon a review of the DEIS and supporting materials made public on your website, as well as my personal experience visiting the Arctic National Wildlife Refuge and that portion of it known as the 1002 Area, or Coastal Plain.

A Procedural Observation and Complaint

For the record, I am submitting this comment by way of the on-line portal, by E-Mail to an address found in other public comment, and by US Mail, but seek to raise the following procedural complaint to preserve my right to future appeal that the comment instructions for this DEIS as posted on-line lack clarity sufficient to guide the general public in understanding how they can reasonably participate in this public comment period. Specifically, after following links from the BLM's web page it appears that the only document for which BLM is taking comment on-line is "Coastal Plain Draft EIS Volume 1". In fact, none of the other documents acknowledge that "Public Participation" is being sought. There is NO public comment button for any of the other documents or Appendices despite the site being configured to otherwise allow for such. When selected for "Coastal Plain Draft EIS Volume 1", the viewer is provided with a comment input box that again is specifically titled as being for "Coastal Plain Draft EIS Volume 1". I will draft my comments to address the entire DEIS package, but I have found the approach used by BLM to solicit these comments to be confusing and unclear with respect to where public input is desired or welcome. Unfortunately this seems to be consistent with how the BLM has gone about engaging communities in Alaska throughout this process. Combined with the 60 minute comment input limitation on the on-line input page, I believe that this DEIS review process fails to meet the spirit and intent of NEPA as a process open to and accessible by all Americans.

My substantive Draft EIS concerns and comments are as follows:

1. Cumulative Effects Must Be Analyzed. Under the CEQ Regulations adopted to guide your implementation of NEPA (40 CFR S. 1502.16), BLM is required to examine and address the cumulative effects and environmental consequences of any proposed action. I find the draft EIS to be lacking in this regard as it relates to likely adverse impacts and needs of the Porcupine Caribou Herd, the polar bear as a species, and the cultural (environmental justice impacts) to the Gwich'in People. Specifically, the EIS fails to adequately address (forecast and analyze) the impacts that a changing climate is having with respect to the baseline condition of the Coastal Plain as it relates to the feeding, birthing/ calving and migration needs of both the caribou and polar bear. To measure forecast conditions by way of a baseline that doesn't adequately anticipate significant climate-related changes to the landscape already underway (warming, thawing, changes in vegetation type) as documented by NOAA and others, fails to honestly evaluate the "whole" of the likely cumulative impacts of the proposed actions (drilling in the Coastal Plain) and assumes an unrealistic "status quo" as that baseline. Additionally, the EIS fails to address the likely and predictable impacts this changing climate, coupled with development of the Coastal Plain, will have upon the culture of the Gwich'in people, other native peoples in Canada as it relates to their food security as a component of environmental justice for which NEPA is intended to address.

The "No Action" alternative is presented in this DEIS as a static condition, and that portrayal is inaccurate and misleading with respect to measuring the potential outcomes associated with each of the "Action" alternatives. A proper and legal analysis would consider these realities. The document should be revised as such.

2. Water Impacts. On one trip to the Arctic Refuge in mid-June several years ago, I found a significant lack of water resources in the area we were exploring, making even the acquisition of drinking water very difficult to sustain our visit. That challenge was something I never anticipated dealing with north of the Brooks Range in June! But it opened my eyes to the reality that the Coastal Plain is not necessarily abundant with respect to water. In my review of the EIS, I find that it fails to honestly analyze the cumulative impacts that development of the Coastal Plain with respect to the water resources necessary to support commercial oil exploration and drilling. Water is the life-blood of all life in the Arctic, and I am concerned that your analysis simply assumes that the water will "be there" for industrial-scale exploration without taking time to study, understand and properly analyze the impacts (even at a macro scale) that use of this water will have upon both the landscape and hydrology of the Coastal Plain, and the plants and animals who call it home.

3. Wildfire Impacts. On another trip north of the Brooks Range I encountered lightning storms which touched off tundra fires to the NE of our location. If a warming climate is likely to result in increased wildfire activity in the Arctic, then this DEIS does not adequately quantify the risks that these fire events could pose with respect to oil extraction infrastructure including new pipelines necessary to transport future oil. Again,

there is a rapidly transforming baseline in climate and vegetative conditions within the Coastal Plain, and this DEIS fails to account for those realities in seeking to forecast potential adverse impacts.

4. What is 2,000 acres? An issue that has troubled me since legislation was first proposed to open the Coastal Plain to development is the 2,000 acre size limitation. While I personally believe that this was crafted as a sly political tactic concocted by Senator Murkowski to minimize the perceived impact of industrial-scale development of this great Wildlife Refuge, I find that the EIS fails to provide any comfort or clarity with respect to how this impact will actually be limited and measured objectively. Specifically, I believe that there is an implied intent to "not" measure what otherwise would be considered an adverse environmental impact as it relates to this size limitation. By this, I mean ice roads, pipelines and other impacts such as borrow pits for gravel utilized in the construction of drill pads, roads and other infrastructure do not appear to "count" for the purposes of analysis by this DEIS. I would argue that because the "No Action" alternative results in NO new construction of any kind, any "built" infrastructure or borrow of material should be considered as an "impact" and counted as part of the 2,000 acre limitation imposed by Congress. By way of NEPA and CEQ regulations, you have a duty to seek to understand the cumulative impacts of these disturbances if the 2,000 acre disturbance limitation is to be meaningful in any way.

This is of particular concern for me as it relates to the visual impacts of oil development within the Coastal Plain as viewed from other areas of the Arctic National Wildlife Refuge including designated Wilderness. I have personally stood on the top of the Sadlerochit Mountains and been able to look without the use of binoculars to see ice on the shore of the Arctic Ocean. If the 2,000 acre size limitation does not include features of the built environment including pipelines, then the analysis fails to properly examine the significant negative impacts that development will have upon the experience of a recreational user in the Refuge and Wilderness Areas.

5. Purposeful Omission of Data. By moving forward with this Draft EIS in the absence of an EIS for the proposed seismic testing within the Coastal Plain, and in advance of USFWS permit requirements relating to potential adverse impacts to polar bears, BLM is purposely and/or negligently failing to benefit from information that should be included within this analysis. This DEIS process should be placed on-hold until that USFWS information is publicly available for review and analysis as part of this DEIS, or the impacts of seismic and other exploration should be included as part of this DEIS so that the public and decision-makers can consider the entire likely impact of these activities upon the area of study. To do otherwise is to attempt to move the analysis for actual development in front of the multi-jurisdictional process of review and permitting for the seismic testing phase.

6. An Assumption of Viability Taints This Review. The entire DEIS is written from a perspective that drilling in the Coastal Plain is inevitable simply because Congress has required a specific number of lease sales within a specific period. This premise taints

the approach taken by BLM in their analysis, and suggests to the reader that the outcome of the analysis is inevitable. This is unfortunate, because an objective DEIS process, implemented with specific mitigation measures, COULD and more than likely SHOULD result in a regulatory climate that would discourage industry from participating. I ask that the DEIS be amended to make it clear to the reader that it is possible that the mitigation measures required to accommodate oil extraction in the Coastal Plain may render any lease sale unattractive to industry.

7. A Predetermined Outcome Violates the Spirit of This Review. On February 28th, President Donald Trump was reported by the Associated Press to have suggested to an audience in Anchorage that opening the Arctic National Wildlife Refuge was "done". That messaging, coming from the individual responsible for the nomination of the Director of the Bureau of Land Management and Department of Interior sends a message to the American public that the outcome of this process has been made in advance of even the public comment period ending. I believe that this public "conclusion" in advance of the process being completed shows a significant bias that calls into question the validity of any of the analysis included within this DEIS.

In closing, it is my strong opinion that the Coastal Plain of the Arctic Wildlife Refuge is not an appropriate location for oil and gas development at any time, and this Draft EIS certainly does nothing to give confidence that the BLM actually cares to objectively understand and evaluate the potential for adverse environmental impacts associated with the direction provided by Congress and the President. It is simply too valuable from a biological perspective given the myriad of bird species and other wildlife which rely upon its unique location and attributes for the survival of their species.

While I recognize the inherently futile nature of even taking time to comment on this document given the bias evident in its creation, and the corruption which exists within the Department of Interior at this time in our Nation's history, I do so as part of a personal commitment long into the future to fight for the few remaining wild places on this planet which I share an ownership interest in as a citizen of the United States of America.

Thank you for your consideration of this input, and for the opportunity to speak for the Coastal Plain of the Arctic Wildlife Refuge.

Sincerely,


Jason Paulsen
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