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**From:** Hayes, Miriam (Nicole) <mnhayes@blm.gov>  
**Sent:** Wednesday, March 13, 2019 8:07 AM  
**To:** coastalplainAR; Sean Cottle  
**Subject:** Fwd: [EXTERNAL] Comments on Coastal Plain Draft EIS

**Nicole Hayes**

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

From: **Amy Gulick** <[amyg@nwlink.com](mailto:amyg@nwlink.com)>  
Date: Tue, Mar 12, 2019 at 9:17 PM  
Subject: [EXTERNAL] Comments on Coastal Plain Draft EIS  
To: <[mnhayes@blm.gov](mailto:mnhayes@blm.gov)>  
Cc: <[ryan@northern.org](mailto:ryan@northern.org)>

Dear Bureau of Land Management:

I am submitting comments on the Coastal Plain Draft EIS in the Arctic National Wildlife Refuge.

I believe that the Draft EIS is deficient for the following reasons:

- 1) The review of scoping and drafting of the EIS was completed in just 5 months. The U.S. Congress authorized 4 years before the first mandated lease sale, and yet the BLM and the Dept. of Interior are rising to hold lease sales with a year. This timeline calls into question whether the Trump Administration is conducting the EIS process in good faith, with adequate attention to public input and science, and in compliance with the law.
- 2) The Gwich'in people of both Alaska and Canada are culturally connected to the Porcupine Caribou Herd, which relies on the coastal plain for its calving and post-calving habitat. Despite acknowledging that oil and gas development can have impacts on caribou, the BLM concludes that there will not be an impact on the subsistence resources for the Gwich'in, and that the subsistence needs of the Gwich'in do not qualify for an 810 hearing under ANILCA, which is required for development that will substantially affect subsistence. This ignores the human rights of the Gwich'in.
- 3) Water is scarce on the Coastal Plain of the Arctic Refuge, and ANILCA requires that there is enough water in the Arctic Refuge to ensure "water quality and necessary water quantity with the refuge" to conserve fish, wildlife and habitats. The draft EIS must demonstrate adherence and that the lease sale will not negatively impact water quality and quantity, and yet the draft EIS avoids providing a clear estimate of how much water will be required for oil and gas development. However, the Center for American Progress did an analysis based on information in the EIS and found that:
  - o 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.

o 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.

4) All of the action alternatives will affect large areas of polar bear critical habitat. The draft EIS acknowledges that “the potential for injury or mortality could be high when developing new oil and gas projects in polar bear habitat.” And yet, there is not estimate of the number of bears that could be killed, injured, or displaced by the leasing process or seismic testing.

5) The BLM acknowledges that oil and gas activities will likely disturb and displace caribou of the Porcupine Caribou Herd, but fails to adequately address these impacts and to consider the full range of areas that are important to caribou.

6) The Tax Cuts and Jobs Act of 2017 stipulated a 2,000-acre surface development limit on the Coastal Plain, and yet infrastructure including ice roads and pads, elevated pipelines, and gravel mines to not count as surface disturbance and, therefore, are not considered in the 2,000-acre limit of surface acres. This is disingenuous, and does not take into account the full impacts of all oil and gas activities and infrastructure.

7) The draft EIS fails to assess how expanding oil and gas development in the Arctic Refuge will exacerbate climate adaptation and mitigation challenges in an Arctic that is warming at a much faster rate than the rest of the United States.

8) The development of the Coastal Plain will impact wilderness and recreation values, two of the primary purposes for the establishment of the Arctic Refuge.

It is clear that the draft EIS process has been rushed, that the document is deficient and violates Indigenous human rights, is harmful to wildlife, and is a slap in the face to the American public, desecrating a place sacred to the Native Gwich'in and entrusted to the American people.

Sincerely,  
Amy Gulick  
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