
From: Hayes, Miriam (Nicole) <mnhayes@blm.gov>
Sent: Wednesday, March 13, 2019 8:08 AM
To: Sean Cottle; coastalplainAR
Subject: Fwd: [EXTERNAL] Public Comment: Draft EIS Arctic National Wildlife Refuge

Nicole Hayes

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

From: **Christina Elderkin** <christina.elderkin@gmail.com>
Date: Tue, Mar 12, 2019 at 5:45 PM
Subject: [EXTERNAL] Public Comment: Draft EIS Arctic National Wildlife Refuge
To: <mnhayes@blm.gov>
Cc: <ryan@northern.org>

Good day!

I am writing with sincere appeal to the BLM, as they have been tasked, to cease and desist from leasing oil drilling in the Arctic National Wildlife Refuge.

As a conservation corps leader for three years, I learned well the histories of our national land management agencies and served all of them through Americorps. I recognize the balancing act that the Bureau of Land Management must perform, in regards to wilderness protection, as well as "sustainable yield," of multiple use resources.

BLM must evaluate all potential future leases on the coastal plain and adjacent federal, state, and Native corporation lands and waters when assessing cumulative impacts. NEPA requires analysis of all reasonably foreseeable past, present, and future actions and the additive, synergistic, and countervailing cumulative effects of proposed actions. The Secretary of the Interior that equates non-management with "nature taking its course," does not understand land management.

The effective date of determination for these wells, is a long way off - after the appropriate analyses of information, mechanical logs and well histories are made. Why do we rush towards uncertain production that will peak in twenty years? (based off of mean estimates [1]). We know that "known geologic structure" is a broad term, used clerically so that drilling and analyses can happen. Unfortunately, we can not minimize this uncertainty, nor the public perception that this determination is ineffective.

Why deceive the public? We know that leasing will not be straight forward. Rushing to complete the program for leasing will not safeguard the leases issued. Substantial geologic and scientific data must be considered, as it is relevant and

highly consequential. Decisions that forfeit the expertise and data will be considered arbitrary and capricious. This behavior from the acting agency will face judicial procedure.

The state of Alaska and the federal government are not guaranteed profits from leasing sales. It is a fact that leases acquired non-competitively are often sold by the original leasee to interested parties [2]. The value of this land does not belong on a piece of paper. We simply cannot drill our way to lower gas prices. ANWR is off-limits not to jobs or production, but to the greed of men.

ANWR was created by the Alaska National Interest Lands Conservation Act (ANILCA) in 1980. Section 1002 of ANILCA deferred a decision on the management of crude oil and natural gas exploration and development of 1.5 million acres of potentially productive lands in the coastal plain of ANWR. Deference is an act of humility and respect. It requires respect and humility to weigh 1.5 MILLION ACRES of WILDERNESS, unlike any other place in the world. The BLM and Congress and all associated parties are globally accountable. You have heard of the Life that belongs to this place, even if you do not know it.

Thank you for your time. It is today, that we shape our shared tomorrow.

Sincerely,
Christina Elderkin

References:

1. <https://www.eia.gov/outlooks/aeo/anwr.php>
2. <https://bit.ly/2EXCtKy>

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