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**From:** Hayes, Miriam (Nicole) <mnhayes@blm.gov>  
**Sent:** Monday, March 11, 2019 8:00 AM  
**To:** coastalplainAR; Sean Cottle  
**Subject:** Fwd: [EXTERNAL] Draft EIS Comment - Coastal Oil Leasing Program  
**Attachments:** Gallenberg\_DEIS\_comment.pdf

**Nicole Hayes**

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

From: **Elaine Gallenberg** <[edgallenberg@alaska.edu](mailto:edgallenberg@alaska.edu)>  
Date: Mon, Mar 11, 2019 at 3:45 AM  
Subject: [EXTERNAL] Draft EIS Comment - Coastal Oil Leasing Program  
To: <[mnhayes@blm.gov](mailto:mnhayes@blm.gov)>  
Cc: <[ryan@northern.org](mailto:ryan@northern.org)>

Hello Ms. Hayes,

Attached is my official comment on the draft EIS for the coastal oil leasing program. Thank you for your time and consideration.

Thank you,  
Elaine Gallenberg

Ms. Nicole Hayes  
Project Manager  
BLM Alaska State Office  
222 West 7th Avenue, #13  
Anchorage, AK 99513

Dear Ms. Hayes,

Thank you for the opportunity to comment on the Coastal Plain Oil and Gas Leasing Program Draft Environmental Impact Statement. I am a resident of Fairbanks, Alaska and a current graduate student at the University of Alaska Fairbanks.

I am writing about my concerns about the proposed Coastal Plain Oil and Gas Leasing Program. I am concerned that the environmental impact statement process did not adequately address all the potential impacts of this program. In a draft completed in only five months, I cannot be confident that all relevant information was explored and considered. I am specifically worried about gaps in the impacts laid out for wetlands and birds, two topics I have spent significant time studying.

As stated in section 3.3.1, at least 96% of the proposed area is designated as wetland, making it subject to special regulation under section 404 of the Clean Water Act and section 10 of River and Harbors act. In the DEIS, the method suggested for quantifying the function of these wetlands was stated as “most suitable in areas where development has already occurred (DEIS, Vol.1, pg. 3-69). I am concerned that this method will not be suitable for capturing the function of the wetlands in question. Wetlands are immensely undervalued resources that provide a wide variety of critical environmental functions including habitat for a unique set of species, filtering pollutants, and helping to mitigate the effects of climate change. In a country that has already lost over fifty percent of its wetlands, it is imperative that the true value of the wetlands in question be captured. The DEIS does not do this and it does not provide adequate plans to.

Another portion of the DEIS of special concern to me is section 3.3.3 about the impact on birds in the involved area. Shorebird populations have declined by alarming rates in the last 30 years. A specific example is the species Lesser Yellowlegs, whose population has declined by ninety percent since the 1970s. Shorebirds, and other species of special concern such as the

Yellow-Billed Loon, and American Golden Plover, depend on the proposed area for successful breeding. More information is needed about the distribution of birds in this area before the full impact can be assessed. Additionally, the impacts listed seem to understate the potential disturbance of this project and “underestimates the area [of impact] for more sensitive birds” (DEIS, Vol.1, pg. 3-97). Habitat for these species is limited and the DEIS does not adequately address the full impact this potential program would have on sensitive species.

These issues are important to me because the health of our environment is imperative to the success of our growth and prosperity as a state and a nation. I think the problems I pointed out can be solved by better review of the current scientific literature, input from more stakeholders, as well as specific experiments to test the effects of the potential development. The best solution would be to change PL 115-97 to allow for Alternative A. Alternative A is the only acceptable option when considering the full cost of all the impacts.

Thank you for your time and consideration of my comment.

Sincerely,

Elaine Gallenberg

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