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**From:** Hayes, Miriam (Nicole) <mnhayes@blm.gov>  
**Sent:** Thursday, March 14, 2019 8:45 AM  
**To:** coastalplainAR; Sean Cottle  
**Subject:** Fwd: [EXTERNAL] Public Comment: DOI-BLM-AK-0000-2018-0002-EIS (Coastal Plain Oil and Gas Leasing Draft EIS)

**Nicole Hayes**

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From: **Cherissa Dukelow** <[cherissa@localpost.io](mailto:cherissa@localpost.io)>  
Date: Wed, Mar 13, 2019 at 6:27 PM  
Subject: [EXTERNAL] Public Comment: DOI-BLM-AK-0000-2018-0002-EIS (Coastal Plain Oil and Gas Leasing Draft EIS)  
To: <[mnhayes@blm.gov](mailto:mnhayes@blm.gov)>

Dear Nicole Hayes:

I am writing to provide comments on the Draft EIS for DOI-BLM-AK-0000-2018-0002-EIS (Coastal Plain Oil and Gas Leasing Draft EIS).

It goes without saying that the land within the Arctic National Wildlife Refuge is crucial untouched habitat that countless birds, mammals, and fish, including many vulnerable migratory species, as well as people rely on for survival. This is why it was preserved in the first place at the recommendation of expert biologists and conservationists.

It is completely egregious that a so-called "requirement" to destroy this important, preserved land within the refuge in the pursuit of oil drilling can be slipped in as a line item in a tax bill, while bypassing NEPA requirements for a no-action alternative, pushing through faster than anyone can comprehend what is happening. A no-action alternative should be included as a true alternative in this scoping.

Meanwhile, the federal government was shut down for a large part of the available comment period for the draft EIS, inaccessible to the public, yet reportedly BLM continued their work on this project.

Moreover, this land rightfully belongs to the native people that have

lived there longer than the United States has existed - this land is stolen. Management decisions about this land including how and whether land should be leased, should fall squarely and solely with the native people that call this land home and depend on the integrity of these ecosystems for survival.

ANILCA set aside the coastal plain of the ANWR in Section 1002 to be open for consideration of oil exploration only under the condition of careful scientific study deeming it safe to the habitat there: “in a manner that avoids significant adverse effects on the fish and wildlife and other resources.”

Is it possible to pursue oil and gas resources in this area without significant adverse effects to the habitat, wildlife, and peoples in that area? Just because the EIS specifies that facility infrastructure needs to be designed to “allow free movement of caribou” doesn’t mean that the design will be successful. Simply constructing roads will disrupt caribou migrations. The EIS suggests comical solutions such as 7-ft tall pipelines and ramps over pipelines to supposedly reduce impact. Can you imagine? This does not eliminate or mitigate impact. The presence of this infrastructure is disruptive and traumatizing, and it will affect the movements of wildlife and people. If nothing else, this infrastructure leaves aesthetic and emotional impact. In addition, there is noise, heat, and potential for leaks. The impact is not merely physical obstruction. Such proposals are insultingly simplistic. Oil and gas activities and infrastructure are going to have significant impact on fish, wildlife, and humans, and pursuing these projects is not compliant with the requirements specified in the laws that were written to protect this area.

Lease Stipulation 6 in the EIS states that, “all lands in the Arctic Refuge Coastal Plain are recognized as habitat of the PCH and CAH and would be managed to ensure unhindered movement of caribou through the area. Objective: Minimize disturbance and hindrance of caribou or alteration of caribou movements.” How will this be accomplished? Is it possible? How would oil lessees be held accountable for this? Subsequent stipulations suggest stopping work, evacuating, etc. when they are migrating. This is a laughably unrealistic vision of operations and a naive thought about the impact on wildlife. What oversight would there be to ensure compliance with these stipulations? How can we predict the behaviors of wildlife in response to these kinds of disturbances? Simply ceasing operations does not undo any impact oil and gas infrastructure and roads would have.

ANILCA Section 1002 requires the secretary to make adjustments to plans for exploration in light of studies or other information that could imply activities would be significantly destructive. However, this area – the coast, is just as important habitat – perhaps the most crucial for many species of concern. Excusing the sacrifice of this land because it a small percentage of the total land within the refuge is not an appropriate way of thinking.

Studies of what oil reserves are not present and accessible and biological impact are not recent and may be outdated. More time for thorough analysis is necessary before an accurate EIS can be put together and decisions about this land can be made. The final EIS should not be completed until updated biological surveys have been completed.

The EIS specifies that infrastructure will be designed to withstand floods. Much of the Alaskan coast is currently experiencing dramatic subsidence as a result of increasing temperatures due to climate change that is only accelerating and becoming more exacerbated with time. How will infrastructure be designed to withstand this changing landscape?

Juxtaposed against this proximity to unstable land and vulnerable waters, oil spills and accidents do always occur with oil infrastructure, and the north slope is absolutely no exception. The remoteness and challenging nature of this region makes proper emergency response to spills inadequate. In April 2017, a damaged BP oil and natural gas well leaked for days before responders were able to stop it. How does the inevitable risk of events like this factor into an analysis of impact to aquatic species and greenhouse gas emissions? How can operators even account for how much pollution events like this cause since it is from a well rather than from a storage unit with a known capacity or inventory?

The required operating procedures specify that waste associated with oil activities should be disposed of by injection. How does waste injection impact this sensitive landscape seismically and hydrologically? How will injection not result in gross contamination in the future with shifting lands and melting permafrost?

The distances from waterways specified for infrastructure and operations seem arbitrary. How do we know what distance from a waterway in the ANWR is sufficient to avoid significant impact in this vulnerable, virgin environment? Many “waterways” in the arctic are contiguous because much of the land is wetland and groundwater is shallow. This is even more true given that permafrost melt is accelerating, which would be exacerbated by oil and gas infrastructure.

EIA estimates that with projected oil production and decreasing oil prices, TAPS might need to be decommissioned by 2026 due to low-flow operational issues. Given this forecast, it would be wise to put resources into figuring out how to avoid this Alaskan crisis. We should be focusing on developing more resilient, alternative energy resources rather than delaying the problem of dwindling oil reserves. Continuing to explore for additional oil is only a stop-gap solution that in the meantime destroys the wildness that defines Alaskan lands and peoples. In addition, TAPS has upcoming dire maintenance needs that will become increasingly cost prohibitive and nonsensical. Drilling for more oil to uphold this system is just digging a bigger hole. We need to work to invest in a more resilient Alaskan economy now.

More broadly, we are facing more and more the inevitability of drastic, frightening, uncertain changes in all aspects of life from climate change. The arctic is warming and changing faster than any other part of the earth, and Alaska faces special challenges. Additional oil extraction and combustion will only make the inevitably dire increasingly devastating and extreme. The only sensible course of action is to do what we can to mitigate these outcomes. We must leave remaining fossil fuel resources in the ground and focus on grappling with adapting to our changing world. A more thorough accounting of potential GHG emissions as a result of oil exploration and drilling should be included in the EIS, and ecological impact analysis should be considered in the context of the dramatic changes underway due to climate change.

Please consider the legality of this legislation and EIS “requiring” oil lease sales and foregoing a no-action alternative. Please allow more time for proper biological and environmental surveys to be conducted.. Please reconsider including and choosing a no-action alternative and continue to preserve this precious wilderness. Please consider the extent of long-term damage oil and gas activities will have on this crucial habitat and the global climate for short-term gain.

Thank you,  
Cherissa Dukelow