

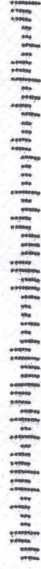
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1525 NW 14th ST
Corvallis, OR 97330

PORTLAND OR 97201

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Coastal Plain Oil & Gas Leasing Program EIS
Ms. Nicole Hayes, Project Manager
BLM Alaska State Office
222 West 7th Avenue, #13
Anchorage, Alaska 99513

95513-750413



FOREVER USA

1525 NW 14th Street
Corvallis, Oregon 97330
richardrsumner@comcast.net

December 28, 2019

Coastal Plain Oil and Gas Leasing Program EIS

Ms. Nicole Hayes Project Manager

BLM Alaska State Office

222 West 7th Avenue, #13

Anchorage, AK 99513

Re: Comment on: Coastal Plain Oil and Gas Leasing Program Draft Environmental Impact Statement (DEIS)

Dear Ms. Hayes,

I respectfully submit the following comments in response to the Bureau of Land Management's request of comments on the Coastal Plain Oil and Gas Leasing Program Draft Environmental Impact Statement "DEIS" (See: 83 FR 67337 – December 28, 2018).

At the end of this set of comments, I conclude with a list of four major deficiencies of the DEIS.

On April 28, 2018 I submitted comments in response to the Bureau's notice of intent to prepare the draft environmental impact statement. Those comments focused on use of an ecological risk approach for assessing the impacts of a large scale leasing program on the Coastal Plain, including program alternatives. Unfortunately, an ecological risk approach was not used in the preparation of the DEIS.

As a consequence, the Bureau did not properly analyze and report the amount of cumulative impacts attributed to each described program alternative. Therefore, great uncertainty remains about whether implementation of any of the listed action alternatives will cause significant degradation of environmental resources of national interest, including aquatic resources, fish and wild resources, subsistence based resources.

In other words, the DEIS describes a set of action alternatives that are environmentally unsatisfactory given the magnitude of ecological risk that might be attributed to each alternative. Likewise, the DEIS is inadequate because it does not consider the ecological risks posed by the cumulative impacts of oil and gas development in the proposed coastal plain lease area.

More specifically, the DEIS gives only a slight nod to cumulative impacts to aquatic resources and wildlife resources in its description of program alternative (See: Pages 3-74, 3-84). Where cumulative impacts are mentioned, they are sometimes confused with secondary impacts. That said, the DEIS does a slightly better job in its discussion of air quality cumulative impacts (See: Page 3-16), and risk associated with the spread of invasive plant species (Page 3-67). Nevertheless, the DEIS does not present a cohesive approach for cumulative impact assessment.

A long accepted definition of cumulative impacts is that they *"result when the effects of an action are added to or interact with other effects in a particular place and with a particular time. It is the*

combination of these effects, and any resulting environmental degradation, that should be the focus of cumulative impact analysis."

Ecological risk assessment is a practical approach for conducting this type of cumulative impact analysis, especially in situations involving development activity that will affect large ecological landscapes over long periods of time. For the proposed Coastal Plain Leasing Program, an ecological risk assessment would produce a comparison of (a) the magnitude of potential environmental harm caused by each program alternative, and (b) the magnitude of mitigation that can be applied to offset that harm with a known amount of certainty. Both the magnitude of environmental harm and magnitude of mitigation response can be profiled and rated for each of the types of environmental resources that comprise the affected coastal plain landscape (e.g., aquatic resource types, sensitive fish and wildlife species). The magnitude of environmental harm and the magnitude of environmental mitigation takes into consideration: (1) Area extent of effect, (2) time duration of effect and (3) certainty of effect.

Change in landscape connectivity caused by development would be a key factor in the ecological risk assessment of cumulative impacts. Change in landscape connectivity will influence each of the three factors listed above.

The information generated by this type of ecological risk assessment can then be interpreted to determine whether the ecological risk posed by cumulative impacts can be offset with mitigation. If the magnitude of environmental harm is substantially larger than magnitude of mitigation, there is high risk of significant degradation of the assessed types of environmental resources.

Unfortunately, four major deficiencies of the DEIS currently hinder the proper assessment and consideration of cumulative impacts as needed to make a reasoned decision about the adequacy of the DEIS and the environmental acceptability of program alternatives.

1. Proposed major lease stipulations described in program alternatives (e.g., "no surface occupancy") are subject to waivers, exceptions, and modifications by the BLM Authorizing Officer. The caveat offers little certainty that the magnitude of impacts will be controlled or will be offset with mitigation.
2. The DEIS provides little information about the practicability and effectiveness of mitigation to offset large-scale disturbance to landscape connectivity and functions (e.g., hydrological flows at "break-up" and wildlife migration patterns). Successful, large scale ecological restoration of North Slope oil and gas development infrastructure has not been demonstrated.
3. The DEIS does not describe an adaptive management strategy whereby environmental monitoring information is specifically used to inform program implementation on a project by project basis, for each program alternative. A fundamental component of adaptive management is the adoption of management response options used with monitoring information shows unanticipated environmental harm and a corresponding lack of mitigation opportunity or performance.
4. The DEIS does not quantify or otherwise proportionally scale the current and future effects of climate change on the environmental resources of the Coastal Plain, and how the effects will influence the magnitude of environmental harm and amount of mitigation opportunity that can be attributed to each of the leasing program alternatives. Generally worded and repeated cursory text in the DEIS about the general consequences of climate change is insufficient (e.g., "*The effects of climate change described*

under Affected Environment above, could influence the rate or degree of the potential direct and indirect impacts").

Each of these flaws are in need of correction before a proper cumulative impact assessment can be conducted using an ecological risk approach. Until a proper cumulative impact assessment is completed, a presumption stands that each of the action alternatives in the DEIS could cause significant degradation of environmental resources of national interest.

I realize that my overview of a suggested assessment framework is a very "dense" in its wording. My intent is to try and communicate that a proper cumulative impact assessment is possible. And, to convey to the Bureau that proper cumulative impact assessment will reveal the true extent of environmental danger associated with opening the Arctic National Wildlife Refuge to oil and gas development.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Sumner', is written over a horizontal line.

Richard Sumner