

PO Box 20993
Juneau AK 99802

2019 JAN 24 PM 1:09

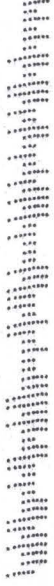
RECEIVED

MAILROOM AK-954



Coastal Plain Oil & Gas Leasing Program EIS
222 West 7th Ave, Stop #13
Anchorage, AK 99513

9951387534 0095



Attn: Coastal Plain Oil & Gas Leasing Program EIS
222 West 7th Ave, Stop #13
Anchorage, AK 99513.

RE: Coastal Plain Oil and Gas Leasing EIS

To Whom It May Concern:

This is a transboundary issue

Impacts to the coastal plain transcend U.S. boundaries. The DEIS must address transboundary impacts and how BLM plans to uphold international agreements and consultation requirements, such as the 1987 agreement between the U.S. and Canada on the conservation of the Porcupine caribou herd and international polar bear treaties and agreements. Oil and gas leasing, exploration, and development are not compatible with the purposes of the refuge.

The Arctic Refuge is the only refuge established specifically "for the purpose of preserving unique wildlife, wilderness, and recreational values." Specifically, purposes include:

- (i) To conserve fish and wildlife populations and habitats in their natural diversity including, but not limited to, the Porcupine caribou herd (including participation in coordinated ecological studies and management of this herd and the Western Arctic caribou herd), polar bears, grizzly bears muskox, Dall sheep, wolves, wolverines, snow geese, peregrine falcons and other migratory birds and Arctic char and grayling;*
- (ii) To fulfill the international treaty obligations of the United States with respect to fish and wildlife and their habitats;*
- (iii) To provide, in a manner consistent with the purposes set forth in subparagraphs (i) and (ii), the opportunity for continued subsistence uses by local residents;*
- (iv) To ensure, to the maximum extent practicable and in a manner consistent with the purposes set forth in paragraph (i), water quality and necessary water quantity within the refuge; and*
- (v) To provide for an oil and gas program on the Coastal Plain. (P.L. 115-97, added in December 2017, with the passage of the tax bill)*

The recently added purpose (v) is not compatible with the 4 original purposes. The draft EIS must explain how the USFWS and BLM will address this and ensure that purposes i-iv are not diminished or otherwise compromised by an oil and gas program on the coastal plain. Including oil and gas as a refuge purpose could require the USFWS to prepare a compatibility determination as part of BLM's development of the oil and gas program; this has not yet occurred.

Oil and gas exploration and development are not permitted under the current Arctic National Wildlife Refuge Comprehensive Conservation Plan (CCP). BLM must acknowledge this discrepancy and describe plans to address this.

Adherence to other Federal laws

Developing an oil and gas plan on the coastal plain and drafting a leasing EIS, the BLM must recognize all of the purposes of the Arctic Refuge and adhere to stipulations and requirements of relevant federal laws, such as ANILCA, the National Wildlife Refuge Administration Act, the Endangered Species Act, the Wilderness Act, the Wild and Scenic Rivers Act, the Clean Water Act, the Clean Air Act, and international treaties.

Oil and gas leasing, exploration, and development are incompatible with preserving wildlife

and their habitats. BLM must fully analyze potential impacts to wildlife and wildlife habitat and develop appropriate and adequate mitigation measures to ensure preservation of this unique wildlife complex in the biological heart of the Refuge in accordance with the purpose for which the Refuge was established. BLM must also use the best available science in making determinations and acknowledge data gaps, missing, and unavailable information.

2000 acres surface development limit

The tax bill passed in December (PL 115-97) "limits surface development to 2,000 acres for production and support facilities, *which need not be concentrated in a single area*" (emphasis added). This 2,000 acres footprint is often compared to a "postage stamp", a dot on the tip of a nose, the size of an airport. Yet, this somewhat arbitrary number was borne out of a hearing on the Refuge in 1995 when a former BP official stated, "If today an oil field was built on the coastal plain — a series of oil fields, you would not occupy more than 2,000 acres of footprint. And in the future you can bet your boots it's going to be reduced even more." ¹ However, these 2,000 acres may not be one contiguous spot; they could be spread throughout the coastal plain relative to locations of desired oil prospects. BLM must identify all production and support facilities that would be included in this limitation and explain how it will be implemented and enforced.

Alternatives and analyses must include all possible site scenarios for the 2,000 acres limit across the entire coastal plain, including analyses specific to each potential 400,000 acre lease sale.

Impacts associated with water withdrawals

Oil and gas development requires large quantities of water diversions and withdrawals. The coastal plain of the Arctic Refuge does not have readily accessible or available water in high quantities (this area differs greatly in that respect from the State land to the west). BLM must list all potential water sources and thoroughly analyze potential impacts to aquatic and riverine systems — localized and downstream — and impacts on resources dependent on those systems and must do so in accordance with the refuge purpose to ensure water quality and quantity within the refuge.

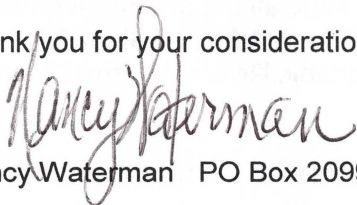
Climate change

Arctic Alaska is ground zero for climate change; temperatures in the Arctic are rising at twice the rate of the rest of the country. Coastal erosion, melting permafrost, and altered landscapes are happening at a rapid pace. Oil drilling will compound these impacts locally and globally. Climate change impacts must be analyzed in the EIS. This includes the contribution of the proposed actions to climate change from emissions on site and potential emissions from oil and gas once shipped out of state, processed, and burned as fuel. The analysis also has to account for how the Coastal Plain is being impacted by climate change as well.

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. 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.

Thank you for your consideration,



Nancy Waterman PO Box 20993 Juneau, AK 99802 907-586-1426