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**From:** Hayes, Miriam (Nicole) <mnhayes@blm.gov>  
**Sent:** Thursday, March 14, 2019 8:35 AM  
**To:** coastalplainAR; Sean Cottle  
**Subject:** Fwd: [EXTERNAL] Comments on Coastal Plain DEIS

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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

**From:** John or Lisa Jodwalis <[jjodwalis@gci.net](mailto:jjodwalis@gci.net)>  
**Date:** Wed, Mar 13, 2019 at 4:06 PM  
**Subject:** [EXTERNAL] Comments on Coastal Plain DEIS  
**To:** <[mnhayes@blm.gov](mailto:mnhayes@blm.gov)>

Dear Ms. Hayes:

Please accept my comments on the Draft EIS on the Coastal Plain Oil and Gas Leasing Program.

**I find this DEIS deficient or inadequate in the following areas:**

- > Not enough time was allowed for adequate review of the supporting documents for all the alternatives, which undermines the intent of an EIS.
- > Adverse impacts of oil and gas exploration and development on wildlife were inadequately addressed, specifically:
  - polar bear denning sites, which occur onshore in the 1002 Area in greater density than other areas of the North Slope, especially consideration of disturbance to these sites or their subsequent abandonment or avoidance by polar bears;
  - habitat for snow geese in the 1002 Area during fall migration when the vegetation they feed on such as sedge, is particularly critical to their long-duration flights south;
  - water quality and quantity for arctic char/Dolly Varden and grayling, which utilize deep pools for overwintering, especially considering the huge amounts of water needed for constructing and maintaining ice roads and oilfield operations and the lack of fresh water sources relative to areas of the North Slope that are west of the Sagavanirktok River;
  - impacts on other migratory birds such as shorebirds, eiders, geese, swans, and ducks that rely on coastal plain wetlands for nesting and brood-rearing;
  - impacts on various wildlife from the increased abundance of red fox, ravens, and grizzly bears that are attracted to oilfield development as has been documented at Prudhoe Bay, with resulting increased predation on shorebirds, waterfowl, arctic fox, and musk oxen;
  - impacts on calving and post-calving behavior and survival by the Porcupine Caribou Herd resulting from physical disturbance by traffic, infrastructure, noise, and pollution.

- > Adverse impacts to the culture, traditions, and food security of the Gwich'in people of Alaska and Canada, who rely on caribou from the Porcupine Caribou Herd in these respects;
- > Adverse impacts to the ecological integrity of the 1002 area due to huge amounts of gravel mining needed to support oilfield infrastructure, and the potential air, water, soil, dust, and noise pollution, as well as the vast amounts of water required as noted above;
- > Adverse impacts of ice roads on tundra vegetation. Ice melts more slowly than non-compressed areas, thus changing the species makeup;
- > Inadequate discussion of the synergistic effects of proposed oil and gas activities combined with climate warming in the 1002 Area where climate warming is already negatively affecting wildlife, specifically eiders and other sea ducks and seabirds, marine mammals such as polar bears and seals, and other marine life dependent on multi-year sea ice.
- > Adverse impacts to the wilderness-dependent recreational activities and scientific research carried out on the Coastal Plain, including rafting, hiking, wildlife viewing, and hunting;
- > Adverse social and ecological impacts in the Dalton Highway Corridor due to increased vehicle traffic, especially noise and dust.

This is not a complete list of my concerns with this draft EIS but it is all that I have had time to consider given the short time-frame for comment.

Thank you for your consideration.

Lisa Shon Jodwalis