
From: Hayes, Miriam (Nicole) <mnhayes@blm.gov>
Sent: Thursday, March 14, 2019 8:46 AM
To: coastalplainAR; Sean Cottle
Subject: Fwd: [EXTERNAL] ATTN: Coastal Plain oil and Gas Leasing Program EIS --- Comments for record of DRAFT EIS
Attachments: Drafts EIS Comments David Levine.pdf
Follow Up Flag: Follow up
Flag Status: Completed

Nicole Hayes
Project Coordinator
Bureau of Land Management
222 W. 7th Avenue #13
Anchorage, Alaska 99513
Desk: (907) 271-4354
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----- Forwarded message -----

From: <dwlevinemd@gmail.com>
Date: Wed, Mar 13, 2019 at 7:51 PM
Subject: [EXTERNAL] ATTN: Coastal Plain oil and Gas Leasing Program EIS --- Comments for record of DRAFT EIS
To: Nicole Hayes <mnhayes@blm.gov>

Dear Ms. Hayes,

Attached is a PDF copy of my comments for the record of the Draft Coastal Plain Oil and Gas Leasing Program EIS.

David W. Levine, M.D., M.P.H.

93 Carlton Road

Newton, MA 02468

dwlevinemd@gmail.com

Nicole Hayes
Coastal Plain Project manager
Bureau of Land Management
U.S. Department of the Interior
Attn: Coastal Plain Oil and Gas Leasing Program EIS
222 West 7th Avenue, Stop #13
Anchorage, Alaska 99513

March 13, 2019

Re: Comments on Arctic National Wildlife Refuge Coastal Plain Leasing Draft Environmental Impact Statement

Dear Ms. Hayes:

Thank you for the opportunity to submit these comments for the record regarding the Arctic National Wildlife Refuge Coastal Plain Leasing Draft Environmental Impact Statement. I am submitting these comments on my own and my family's behalf. I had the good fortune to live in Alaska for several years. I worked on the Alaska National Interest Lands Conservation Act and Alaska energy issues, including route options for a proposed natural gas pipeline from the North Slope to the lower 48 states. I have travelled across the North Slope including the Arctic National Wildlife Refuge, Prudhoe Bay, and parts of the National Petroleum Reserve Alaska.

I have many concerns regarding the scientific and legal adequacy of the Draft EIS. Due to the short time available to review the Draft EIS, I am limiting my comments today to a few overall points. These points are the rushed Interior Department EIS timeline and the lack of adequate scientific content addressing the potential effects of North Slope climate warming on current North Slope engineering and oil development practices.

As I noted in comments previously submitted as part of the EIS scoping process, the EIS timeline is too short. The abbreviated timeline is inadequate to meet the requirements to fully study the environmental impacts of development in the Arctic National Wildlife Refuge and to assess alternatives. The subsequent issuance of the Draft EIS and the confusing, rushed hearing process only serves to heighten these concerns.

The Draft EIS does not adequately address the effects of global warming/climate change on the North Slope and the implications for arctic engineering and oil development practices. Some examples of these concerns include shorter winter seasons, less snow cover for winter seismic exploratory activities, increased stress/risk to wildlife, and less stable permafrost. The Department of the Interior needs to thoroughly research, understand and have a credible plan to address the impact of climate change on arctic conditions including permafrost, wildlife,

snow fall and arctic engineering practices. Such information and analysis are currently lacking throughout the Draft EIS.

Thank you for the opportunity to submit these comments for the record of the Draft EIS review. I would appreciate it if you would add my e-mail address to the distribution list for the Coastal Plain Leasing Program EIS. I made a similar request with my submission of comments for the EIS scoping process but have not yet received any e-mail updates from the program.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. W. Levine".

David W. Levine, M.D., M.P.H.
93 Carlton Road
Newton, MA 02468
dwlevinemd@gmail.com