
From: Hayes, Miriam (Nicole) <mnhayes@blm.gov>
Sent: Wednesday, March 13, 2019 4:08 PM
To: coastalplainAR; Sean Cottle
Subject: Fwd: [EXTERNAL] Coastal Plain Oil and Gas Leasing Program EIS - Northern Alaska Environmental Center comments
Attachments: Northern Center Coastal Plain leasing program DEIS submitted comments.pdf

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From: **Lisa Baraff** <lisa@northern.org>
Date: Wed, Mar 13, 2019 at 2:51 PM
Subject: [EXTERNAL] Coastal Plain Oil and Gas Leasing Program EIS - Northern Alaska Environmental Center comments
To: <mnhayes@blm.gov>

Dear Ms. Hayes,

Attached are the Northern Alaska Environmental Center's comments on the Draft Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program. I will also submit this via the commenting portal on BLM's eplanning website to ensure that it is included in the public record.

I would appreciate acknowledgement of receipt of this e-mail and the attached document.

Thank you.

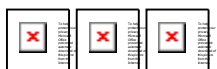
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March 13, 2019

Submitted via email

Nicole Hayes
Attn: Coastal Plain Oil and Gas Leasing Program EIS
222 West 7th Ave., Stop #13
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Comments re: Notice of Availability of the Draft Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program and Announcement of Public Subsistence-Related Hearings, 83 Fed. Reg. 67,337 (Dec. 28, 2018).

Dear Ms. Hayes:

Thank you for the opportunity to submit written comments on the Notice of Availability of the Draft Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program and Announcement of Public Subsistence-Related Hearings, 83 Fed. Reg. 67,337 (Dec. 28, 2018). I am submitting these comments on behalf of the Northern Alaska Environmental Center and our more than 2,000 contributing members and supporters.

Since 1971, the Northern Alaska Environmental Center has been steadfast and resolute in advocating for northern Alaska's lands, waters, and communities, including the Arctic National Wildlife Refuge (formerly Range). We oppose all oil and gas exploration and development activities on the Coastal Plain of the Arctic National Wildlife Refuge (Arctic Refuge) and stand with the Gwich'in Nation of Alaska and Canada in their efforts to protect their human rights and food security, which have been intricately woven into the fabric of the Coastal Plain since time immemorial. Oil and gas activities on the Coastal Plain will have both localized and broad-reaching unavoidable, unmitigable, and irreversible negative impacts on Arctic Refuge wildlife, ecology, and climate.

Although we consider Alternative A, the No Action Alternative, the only rational and viable alternative presented in the DEIS, we provide the following comments on myriad components of the DEIS, including process, NEPA failings, and resources inadequately addressed and analyzed.



NEPA Process failings

BLM fails to consider a reasonable range of action alternatives as required under NEPA. Alternatives that should be considered and were not include minimized lease acreage, leasing deferrals, alternatives with non-waivable mitigation measures (e.g., stipulations, best management practices, and required operating procedures), and alternatives that prevent future development or only permit contiguous development. None of the action alternatives consider offering less than 1 million acres for leasing, even though each lease sale is only required to be 400,000 acres, for a total of 800,000 acres. Nor do the alternatives consider the likelihood that not all acreage offered for lease will sell and would then be rolled into subsequent sales, resulting in fewer total acres required to meet the stipulation that two lease sales of not less than 400,000 acres each occur within seven years of enactment of the Tax Cuts and Jobs Act of 2017 ([P.L. 115-97 Sec. 20001](#)).

The rationale presented in Section 2.3 (Alternatives Considered But Eliminated From Detailed Analysis) regarding the decision to not carry forward an alternative considering 800,000 acres is irrational. BLM argues that low and medium potential areas must be included, since the high potential area is only 427,900 acres. With 658,400 acres of medium potential and 477,200 of low potential, BLM would only need to include 372,100 acres of medium potential and no acres of low potential areas. And that assumes that 400,000 acres would sell in each lease sale. In addition, BLM argues that the acreage considered in Alternative D (1,037,200) is “similar in concept” to an 800,000 acre option. The roughly 30% difference in acreage could be anything but “similar.” Given that P.L. 115-97 Sec. 20001 allows for the first lease sale within 4 years and a subsequent lease within 7 years of the Act, BLM should consider this EIS for only the first lease sale and conduct a subsequent EIS for the second sale, reevaluated based on acreage that leased in the first sale.

BLM fails to adequately analyze, compare, and present potential impacts across resources and alternatives. The DEIS does not include impact criteria and overall rankings that show the level of impact by alternative for impacts to all resources in text or in impact summary tables. This makes it difficult to compare impacts between alternatives or synthesize information in a manner that is easy for the public to understand. It is particularly troubling that the analysis of impacts lacks conclusions within the body of the DEIS and in the Executive Summary as this greatly hinders review of impacts and alternatives comparisons, especially given the short timeframe allowed for public review of the DEIS. BLM needs to provide a meaningful analysis, conclusions for the levels of impacts, and a comparison between alternatives for all resources.



In addition, by condensing the NEPA process in time and scope, BLM opted to incorporate numerous documents by reference, yet failed to adequately summarize or provide access to those documents to enable review and analysis by the reader. Omitting detailed descriptions and analyses of information ostensibly pertinent to impact determination on the Coastal Plain by merely referencing analysis previously conducted for other NEPA documents (e.g., the SEIS for GMT2 or the Effects of Oil and Gas Activities in the Arctic Ocean FEIS) is problematic. The documents are not readily available to the public and are difficult to navigate in a timely manner, if they are available.

Flawed Public Process

The public comment period offered for this DEIS was woefully inadequate. The DEIS was unofficially released on 12/20/2018, the day before the Federal government shutdown, then officially released during the shutdown on 12/28/2018. The BLM website was often unavailable and no BLM personnel were available to answer questions during the 35 day shutdown. This included questions about purported meeting schedules and requests for hard copies of the DEIS. This office put in a request for hard copies and answers to questions from Ms. Hayes that went unheeded for 20 days from January 8-28, 2019, [while Ms. Hayes was reported to be still working on scheduling meetings for the lease process.](#) Soon after the shutdown ended in late January, the BLM announced the schedule for meetings. Hearings were scheduled with less than two weeks' notice --- and only 4 days' notice for Fairbanks. The announcement was in our local paper 3 days before the hearing and we received our mailed notice the day of the hearing. That is unacceptable, as was holding the bulk of the meetings during working hours when fewer could attend.

BLM did extend the comment period for 30 days once the federal government reopened. At the least, the comment period extension should have equaled the shutdown period in length. Realistically, the comment period should have been extended for an additional 30-60 days to allow for reasonable and appropriate review of the DEIS.

BLM failed to fulfill the numerous requests to translate the DEIS into Inupiaq and Gwich'in and to translate testimony given in those languages. There were no translators available at the urban hearings and the scoping testimony (May 29, 2018) given in languages other than English was never translated, according to scoping meeting transcripts available on the e-planning document page. In addition, I spoke with Ted Murphy, Acting Director of BLM in Alaska, at the Fairbanks hearing on 2/4/2019 and asked if the DEIS was being translated. He indicated that BLM was contracting someone to do that. It has not been done and it is now



too late for a Gwich'in or Inupiaq speaker to review this document – the consequences of which will greatly impact them – in their native language.

The DEIS fails to acknowledge and adequately consider the purposes for the Arctic Refuge

Before the Tax Cuts and Jobs Act, the seven purposes for the Arctic Refuge and the Coastal Plain included three from the original 1960 Range designation and four added by ANILCA in 1980: 1) preserving wildlife values; 2) preserving wilderness values; 3) preserving recreation values; 4) conserving fish and wildlife and habitat; 5) meeting international treaty obligations regarding fish, wildlife, and habitat; 6) continuing to provide for subsistence; and 7) protecting water quantity and quality needed to meet fish, wildlife, and habitat needs.

Although BLM acknowledges the four ANILCA purposes (4-7 above), it repeatedly fails to adequately address the original three purposes from the 1960 Range designation among the recognized Arctic Refuge purposes in the DEIS. These original purposes must be considered when identifying the Refuge purposes with which the oil and gas program must be consistent. For instance, failing to acknowledge that protecting wilderness is a purpose of the Coastal Plain, as part of the Refuge, BLM excludes stipulations or required operating procedures that would protect these values on the Coastal Plain. The one alternative that includes a wilderness-related stipulation attempts to protect wilderness values in the Mollie Beattie designated Wilderness area of the Refuge and not elsewhere.

The Tax Act added an additional purpose to provide for an oil and gas program on the Coastal Plain, but did not prioritize this purpose above the others. The seven original purposes cannot be subsumed by this newly added purpose. BLM fails to address how the proposed oil and gas program and the different action alternatives in the DEIS will impact the previously existing purposes and how the Fish and Wildlife Service's (FWS) administration of the Refuge to ensure the refuge purposes will be met, which is required by law.

As noted above, the BLM fails to account for the wilderness purpose of the Coastal Plain when identifying the area's purposes in the DEIS. Without acknowledging the wilderness purpose, BLM cannot accurately evaluate impacts of an oil and gas program on the wilderness characteristics of the Arctic Refuge and Coastal Plain. The DEIS does state that the four primary qualities of wilderness occur throughout the Coastal Plain, except in certain tracts near Kaktovik. BLM does not clarify what it means by "tracts." BLM needs to more fully and accurately describe the wilderness characteristics in the DEIS, including providing maps illustrating the characteristics under consideration. BLM's analysis of the impacts by



alternative is sorely lacking. Recognition that impacts from oil and gas development will be greater for the three action alternatives than the no-action alternative is common sense, not an analysis.

The DEIS lacks analysis of the impacts of oil and gas activities on the adjacent Mollie Beattie Wilderness. Concerned with wilderness, and recreation values, two of the primary purposes for the establishment of the Refuge, Dr. Stuart Smith conducted a GIS analysis of the visual impact of development and found that, “the visual impacts of coastal plain development would be significant and wide-ranging.” For example, “oil and gas development activity across a vast majority (88%) of the 1002 Area would potentially be visible to people rafting six of its major rivers, even when structures as low as 15m are in place.” Further, from high points within the federally designated Wilderness portion of the refuge, over 99% of the coastal plain and any development thereon will be visible. BLM must analyze potential impacts of its proposed oil and gas program on designated Wilderness and ensure that development does not degrade Wilderness qualities and its management under ANILCA and the Wilderness Act.

One of the specific purposes of the Arctic Refuge established under ANILCA is to ensure “water quality and necessary water quantity within the refuge” to conserve fish, wildlife and habitats. This DEIS must demonstrate adherence and that the lease sale will not negatively impact water quality and quantity. Water on the Coastal Plain of the Arctic Refuge is particularly scarce. There are few open lakes and rivers compared to the Western Arctic and especially in winter when the surface is frozen there is very little free water available. The BLM does no new analysis of how much water is actually available on the Coastal Plain and therefore does an insufficient job of analyzing impact to that water quantity.

The DEIS fails to adequately determine how much water will be required for exploration and development. Analysis of information within the DEIS conducted by the Center for American Progress indicates that the volume required is staggering and clearly significant. For example, the DEIS estimates that drilling one well requires 420,000 to 1.9 million gallons of water. Each action alternative has at least 17 ‘satellite pads’ and 1 anchor pad (Vol. 2, Table B-5), and an estimated 30 wells will be drilled from the average pad (Vol. 2, B-17). Drilling 540 wells would, therefore, require between 227 million and 1 billion gallons of water. In addition, every mile of ice road requires 1 million gallons of water (Vol. 2, B-13), each ice pad requires 500,000 gallons of water (B-12), and daily production of 50,000 barrels of oil would require 2 million gallons of water per day. Water availability and impacts of water withdrawal is significant concern, requiring more thorough consideration. In their comments



on the NOI, US Fish and Wildlife Service emphasized concerns about the “cumulative impacts of all stages of oil and gas development” on water: “Water withdrawals from the streams, rivers and springs could have significant and detrimental implications to the populations and habitats of fish and wildlife.” In an internal memo at the Department of Interior, [released by Public Employees for Environmental Responsibility \(PEER\) on March 12, 2019](#), USFWS, BLM and USGS scientists conclude there are significant information gaps and more studies are needed to conduct a real scientific analysis of potential impacts. These gaps include things as basic as, “characteriz[ing] seasonality in water quantity and quality to allow for science-informed NEPA processes and development of BMPs and permitting stipulations that ensure protection of fish and wildlife habitat and account for cumulative impacts of climate change,” amongst others.

The interpretation of the 2000 acre surface development limit is faulty

Section 20001 of the Tax Cuts and Jobs Act establishing the oil and gas program on the Coastal Plain included the following: “In administering this section, the Secretary shall authorize up to 2,000 surface acres of Federal land on the Coastal Plain to be covered by production and support facilities (including airstrips and any area covered by gravel berms or piers for support of pipelines) during the term of the leases under the oil and gas program under this section.” BLM’s interpretation of this is faulty, excludes damaging development-related activities, and would allow for acreage in excess of the “up to 2,000 surface acres” authorized in the Tax Act.

The DEIS excludes ice roads and pads, elevated pipelines, and gravel mines from its definition of surface disturbance and, therefore, the 2000 acre limit of surface acres outlined in the PL 115-97. BLM states that “inclusion of such facilities would make Congress’s clear purpose – establishment of an oil and gas program on the Coastal Plain – impracticable” (Vol. 2, Appendix B-9) suggesting that they conducted their analysis in order to draw the desired conclusion. BLM’s rationale for excluding gravel mines is that “they supply raw materials for construction of oil and gas facilities but are not themselves oil and gas facilities any more than are mills that supply steel for construction of pipelines and other facilities.” This is a false comparison. It might make sense if the gravel were imported into the region as is the steel that is created elsewhere. Gravel mines will be used to supply the gravel that is directly used to build the roads and pads for any oil and gas developments, and are therefore integrally related support facilities, and they will be located within the leasing area. The entire purpose of these gravel mines would be to supply gravel for any oil and gas infrastructure; they would not be developed if there was no oil and gas program. BLM needs



to fully account for the total number of acres that could be directly and indirectly impacted from gravel mining used to support the oil and gas program as part of the 2,000 acres.

BLM is also only counting 2000 acres “at any given time” (Vol. 1, p. 3-221). This means that any land that is “reclaimed” can be deducted from the 2000 acre cap and credited toward more development. This rolling cap interpretation would allow for an expansion of impacts across the Coastal Plain over time. This is based on a faulty assumption that in 10-50 (or even 85 or more years) that an area can be reclaimed. BLM states in required operating procedure 35 that it will “[e]nsure ongoing and long-term reclamation of land to its previous condition and use” through unspecified reclamation requirements. BLM claims that, before final abandonment, “land used for oil and gas infrastructure — including well pads, production facilities, access roads, and airstrips — will be restored to ensure eventual restoration of ecosystem function and meet minimal standards to restore general wilderness characteristics.” What are the criteria for reclamation and what agency will be responsible for determining what is adequately reclaimed and when that land can be released from the 2000 acre cap?

The DEIS fails to consider what 2,000 acres of development could look like geographically and spatially, and the impacts that could occur depending on the location of activities and development. BLM also failed to explain what method it will use to track and regulate surface development to actually keep any development below this 2,000 cap and what happens when the cap is reached. Does development on leases cease and how will that be ensured?

BLM’s ANILCA 810 evaluation is inadequate

BLM’s ANILCA (Alaska National Interest Lands Conservation Act) 810 evaluation determined that the cumulative case may significantly restrict subsistence uses and needs for the community of Kaktovik. As a result, BLM held an ANILCA 810 hearing in Kaktovik coincident to the DEIS hearing, but did not hold similar hearings in any other communities. Despite acknowledging that oil and gas development will impact the Porcupine Caribou Herd (PCH), BLM concludes that there will not be an impact on the subsistence resources for the Gwich’in communities that rely upon the herd and that the subsistence needs of the Gwich’in do not qualify for an 810 hearing under ANILCA, which is required for development that will substantially affect subsistence. Although the DEIS clearly states that Arctic Village and Venetie rely on the PCH and the herd will be impacted, it concludes that only Kaktovik requires an 810 hearing.



While Kaktovik is the only community that harvests caribou specifically within the boundaries of the Coastal Plain, the PCH is not static – it is highly migratory and a critical resource during its migration across northeastern Alaska and northwestern Canada. Any impacts to the PCH on the Coastal Plain – a critical calving, post-calving, and insect relief area – will affect the herd throughout its range in Alaska and Canada, including the 22 Inupiaq and Gwich'in communities that depend upon the caribou. Any changes in fecundity, abundance, or distribution caused by development on the Coastal Plain will affect the herd across its entire range. Ignoring Gwich'in subsistence needs is ignoring the traditional knowledge and human rights of the Gwich'in.

Oil spills and blowouts are not adequately addressed

The risks of oil spills are dramatically understated in the DEIS. The DEIS minimizes the potential for a spill by stating that “The probability of a spill over 100,000 gallons is low,” because on the North Slope, “only three documented spills have been greater than 100,000 gallons” (Vol. 1, p. 132). According to the Center for American Progress, oil fields on the North Slope have averaged more than 400 oil spills per year and, across Alaska, there were 16 major spills from 2002 to 2016 that released at least 10,000 gallons of oil into the environment. Five of those spills released more than 100,000 gallons of oil.

There have been several blowouts (uncontrolled releases from wells) on the North Slope in recent years. BP Exploration Alaska (BPXA) experienced two blowouts from existing production wells in April 2017 and December 2018, and Repsol had a blowout in February 2012 from an exploration well. All of these blowouts released oil and posed worker safety hazards. Table 3-15 shows the risk of blowouts with oil spills of any size to be Very Low. Given these three recent onshore incidents on the North Slope, the risk of a blowout with full-scale development on the Coastal Plain does not appear to be Very Low as stated in the DEIS. BLM should work with the Alaska Oil and Gas Conservation Commission (AOGCC) and reassess this risk and revise the EIS accordingly. In an order (Other Order 149, Feb 28, 2019) recently released on the BPXA blowouts, AOGCC baldly states that, “BPXA also has no evidence that permafrost subsidence will not result in sudden catastrophic failure. Given the lack of evidence, BPXA’s current well integrity management methods may not be sufficient to identify 2-casing-string wells that develop subsidence risk.” Further, “If the tubing or annuli are in communication with the Prudhoe Bay reservoir, the result could be an uncontrolled release of produced fluids at the surface.” This draft must analyze the potential effects of permafrost thawing, and the contingencies for uncontrolled spills. The blowouts at the BP



wells were determined to be related to permafrost thaw, an issue that will undoubtedly magnify with the warming trends and melting permafrost associated with climate change.

Climate Change

The BLM significantly underestimates carbon emissions that would result from drilling in the Arctic Refuge, estimating only 56,739 to 378,261 metric tons of annual direct GHG emissions (from extraction, transport, etc.) and 0.7 to 5 million metric tons of annual indirect GHG emissions (from combustion and downstream use of the oil) - measured in CO₂ equivalent. (Vol. 1, Table 3-5 p.78) This is misleading and only calculated from the increase from oil demand that the analysis predicts will result from developing the Coastal Plain and does not account for burning all of the oil BLM projects will be extracted. That number is much larger. The DEIS fails to assess individual and cumulative impacts of the GHG emissions that will result from the oil and gas program. There is no assessment of the climate change impact associated with the anticipated emissions.

The DEIS completely fails to assess how expanding oil and gas development in the Arctic Refuge will further exacerbate climate adaptation and mitigation challenges in an Arctic that is warming at twice the rate of the rest of the country (the North Slope is warming at an estimated 2.6 times the rate of the contiguous U.S.). The total absence of any analysis considering how the contribution of the emissions from the Coastal Plain oil and gas program action alternatives will interact with other sources of emissions to exacerbate the impacts of climate change violates the requirement to take a hard look at the cumulative impacts of the action being studied. The U.S. Global Change Research Program released the “Fourth National Climate Assessment” in November 2018. Information and analyses included therein must be reviewed and used to inform the climate change discussions in the EIS; it was not included in the DEIS.

The DEIS fails to evaluate how the oil and gas program will undermine attainment of the carbon levels required to mitigate climate change. The DEIS fails to consider cumulative impacts in light of the 2018 IPCC reports that outlined the urgent need for drastic and sustained GHG reductions by 2030 to avoid the most disastrous consequences of climate change. Reducing fossil fuel extraction is an integral part of the solution. To stay below a 2°C temperature rise requires that no new fossil fuel extraction or transportation infrastructure be built. Oil and gas leasing and development in the Coastal Plain of the Arctic Refuge is fundamentally incompatible with staying within the global carbon budget necessary to maintain a livable planet.



Impacts to Caribou

The Coastal Plain provides vital calving and post-calving habitat for the Porcupine Caribou Herd (PCH). The Coastal Plain offers nutrient rich forage, protection from predators, and relief from the relentless insects of the Arctic. The PCH use all of the Coastal Plain for various habitat needs during its annual migration. The BLM acknowledges that oil and gas activities will likely disturb and displace caribou, especially sensitive cows and calves. Map 3-21 shows PCH calving and post-calving covering most of the Coastal Plain (Vol. 2, 3-21). BLM estimates that only 49% of the Coastal Plain is sensitive calving grounds for the PCH, but this vastly undercounts the value of the coastal plain to the caribou, who use essentially all of the Coastal Plain during calving and post-calving when they are sensitive to disturbance. The agency fails to adequately address these impacts and to consider the full range of areas that are important to caribou. Anything that moves the herd away from the Coastal Plain has been shown to be detrimental to calf survival (Vol. 1, p. 3-114) and, in fact, would likely hinder population growth (Vol. 1, p. 3-115). Additionally, other potential calving areas to the east have a higher density of predators and less suitable vegetation. The DEIS offers insufficient mitigation of the impacts to PCH. Even the most restrictive alternative only halts “major construction activities” --but not drilling--for a single month of the year when caribou are calving (Vol. 1, 2-13).

In addition to the importance of the calving period, pre-calving arrival on the calving grounds, post-calving, and summer insect relief are also critical to calf and adult survival throughout the year. The entire Coastal Plain is used by caribou over time. The DEIS needs to clearly reflect the full array of historic data that represent use of the Coastal Plain.

Displacement and disruption of calving and post-calving caribou by oil exploration and development in the Refuge, where the densities of caribou are very high, is likely to have far greater consequences than historically seen in state and federal lands to the west of the Refuge. This includes the influence of the narrower Coastal Plain (only 10-40 miles wide) in the Arctic Refuge which drastically limits available suitable habitat. The DEIS fails to include implications of this feature for caribou and must do so in a revised DEIS.

Caribou movements are intricately tied to resource availability, whether that is for forage or for insect relief or predator avoidance. For these reasons, the entire Coastal Plain is important for caribou, not just areas that have shown repeated use in the recent past. Areas within a caribou herd's range may not be used for extended periods, but as herd movement patterns shift (possibly due to climatic change), the infrequently used areas may become important.



BLM needs to evaluate the potential costs for caribou population growth and survival of not being able to access nutritious forage or other resources for one or several years in a row due to development, rather than just asserting that an abundance of habitat means there will be no consequences of displacement. BLM must further analyze the potential shifts to migration patterns that may arise due to restricting calving and post-calving range on the refuge and the potential subsistence impacts related to this migration shift.

Impacts to Polar Bears

All of the action alternatives would affect large areas of polar bear critical habitat. There are currently just 900 Southern Beaufort Sea polar bears, and the population has declined approximately 50% in the last 30 years (Vol. 1, p. 3-125). The use of land in the Coastal Plain for denning and as summer refuge for polar bears in the region has and will continue to increase with the loss of sea ice, pushing more and more polar bears to require the Refuge for survival. Polar bear critical denning habitat constitutes 77% of the program area (Vol. 1, p. 3-133) and maternal dens are disproportionately high in high hydrocarbon potential zones (Vol. 1, p. 3-134). The DEIS acknowledges that “the potential for injury or mortality could be high when developing new oil and gas projects in polar bear habitat.” (Vol. 1, p. 3-142) Nevertheless, there is no estimate of the number of bears that could be killed, injured or displaced by the leasing process or seismic testing.

Conclusion

Given the shortcomings outlined here, we ask that BLM recognize that this Draft EIS does not meet the standards necessary to uphold NEPA process requirements, including fair and accessible public process and standards of scientific integrity. It provides no acceptable action alternatives, and we ask that BLM produce a revised draft, addressing these deficiencies and allowing for further public input.

Thank you for the opportunity to comment.

Respectfully yours,

Lisa Baraff
Program Director

