
From: Hayes, Miriam (Nicole) <mnhayes@blm.gov>
Sent: Thursday, March 14, 2019 8:48 AM
To: coastalplainAR; Sean Cottle
Subject: Fwd: [EXTERNAL] DOI-BLM-AK-0000-2-18-0002-EIS Coastal Plain Oil & Gas Leasing EIS

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From: **Susan Smith** <susanlnsmith@gmail.com>
Date: Wed, Mar 13, 2019 at 9:08 PM
Subject: [EXTERNAL] DOI-BLM-AK-0000-2-18-0002-EIS Coastal Plain Oil & Gas Leasing EIS
To: mnhayes@blm.gov <mnhayes@blm.gov>
Cc: <Ryan@northern.org>

My name is Susan Smith. I live in Fairbanks, Alaska, and first became an Alaska resident in 1972. While I have not lived here continuously, due to family needs, I have been a resident almost 25 years. I am privileged to have seen some of the beauty of the North Slope while working at Prudhoe Bay during pipeline construction.

I wish to comment on this draft EIS because time is running short. Due to the magnitude of this project, I believe the comment period should be extended. Perhaps the EIS drafting period should have been extended, as well, as it seems to have some gaps in logic.

I believe the Tax Act of 2017, which included a provision for oil gas leasing in ANWR, mandates a lease offering of 400000 acres, and stipulates 2000 acres may be devoted to infrastructure. 2000 acres does not seem like much compared to the entire Coastal Plain, but it appears that the term infrastructure does not include roads, gravel pits, etc, which will certainly have as much impact as a drill pad itself. Infrastructure needs to be redefined to include all man-made transformation of the area.

Also, it looks like the 2000 acres means 2000 acres at one time, and when one area is finished, the leaseholder can move on to another 2000 acre parcel. This is ludicrous, as it opens the entire area to destruction. This does not sound like what Congress intended. This 2000 acre provision needs to be more carefully considered and defined to truly minimize the impact of development on the wilderness uses originally intended in establishing ANWR.

I did not see any provision for bioremediation during or after the drilling period. Complete remediation should be a requirement of any resource development anywhere, to minimize the probable negative effects of development on current or future users, including people and wildlife.

I am concerned about the volume of water needed for drilling and to build ice roads and ice pads. It could be up to a billion gallons for drilling, depending on the number of wells, and millions of gallons for ice roads. The eastern Coastal Plain, is relatively dry. Many people do not know that northern Alaska is classified as a desert climate. The wildlife this Refuge is designed to protect, birds, fish, and mammals, require adequate water to survive. The EIS does not seem to address this issue. Moreover, what will happen to surface soils when the water table is depleted?

The subsistence needs of the Native people who rely on the caribou population (hence the word subsistence: required for life) have not been adequately addressed. ANILCA 810 requires special consideration for development that affects subsistence. The DEIS says that oil/gas development will affect the caribou population, yet says there is no impact on subsistence resources. This is a complete contradiction. The impact of development on caribou and the people who depend on them needs to be defined. And then mitigated by new provisions.

There is little in the DEIS about the impact of development on polar bears, whose population is already stressed due to shrinking ice coverage. Polar bears are increasingly denning on land, which will only be made more difficult by the presence of human activity. Also, the DEIS does not appear to address the impact on migratory birds who come from very far away to summer on the plain. An adverse impact here could cause adverse impacts on the population in other parts of the world. The world ecosystem is totally intertwined, and an adverse impact on one niche will be an adverse impact on all related niches, so it is not just a few polar bears we are concerned about.

As an editorial comment, I would strongly insist that the people of the world NEED wilderness, NEED clean air and clean water to survive both physically and spiritually. We will not continue to need oil much longer, so why should we let short term, short sighted, and narrowly focused economic interests destroy what really matters: the health of our planet? If we feel we need oil in the short term, let's be sure the industry plays fair and allows for the benefit of future generations by preventing damage to its surroundings.

Thank you for this opportunity to comment. I hope you leave the comment period open for a more adequate period, as there are many issues here to be studied.

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