
From: Hayes, Miriam (Nicole) <mnhayes@blm.gov>
Sent: Wednesday, March 13, 2019 8:09 AM
To: coastalplainAR; Sean Cottle
Subject: Fwd: [EXTERNAL] Attn: Coastal Plain Oil and Gas Leasing Program EIS

Nicole Hayes

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From: **Kaarle Strailey** <kaarle.strailey@gmail.com>
Date: Tue, Mar 12, 2019 at 5:04 PM
Subject: [EXTERNAL] Attn: Coastal Plain Oil and Gas Leasing Program EIS
To: <mnhayes@blm.gov>

I tried to submit these through the portal but am not sure that it ever went through. Now it seems the url is dead... I hope that resubmitting these through email won't be a redundant submission, but I did want to make sure they got in. Please consider the following comments regarding the Coastal Plain Draft EIS.

I hope that I haven't overlooked explanations for the issues I am concerned about, but this document was difficult to comb through thoroughly as a common citizen in my "spare time".

Regarding the portrayal of resources and uses of the program area in the Draft EIS, it is inappropriate that this document opens with the mission of the BLM. This is a report about National Wildlife Refuge System lands, not BLM lands. The mission of the National Wildlife Refuge System is to administer a national network of lands and waters for the conservation, management, and, where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans. The US Fish and Wildlife Service, which stewards these lands, has the mission of "working with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people." Either of these mission statements would be appropriate for establishing context for decision making processes in the Arctic Refuge. Opening with the BLM mission creates a false context for the entire document.

I offer the following suggestions for improving implementation of an oil and gas leasing program consistent with the purposes of the Arctic National Wildlife Refuge. I didn't find these purposes anywhere within the DEIS but the following are what I found online:

The ANILCA purposes are:

- (i) to conserve fish and wildlife populations and habitats in their natural diversity;

- (ii) to fulfill the international fish and wildlife treaty obligations of the United States;
- (iii) to provide the opportunity for continued subsistence uses by local residents; and
- (iv) to ensure water quality and necessary water quantity within the refuge.

www.fws.gov/refuge/arctic/faqs.html

I offer the following suggestions for improving implementation of an oil and gas leasing program consistent with these purposes of the Arctic Refuge:

Alternative A is the only alternative that satisfies these purposes. Furthermore, the Comprehensive Conservation Plan for the Arctic National Wildlife Refuge was recently completed after a thorough, deliberate, and highly participatory public process. A Vision Statement was developed through the CCP stating The Arctic Refuge Vision: This untamed arctic landscape continues to sustain the ecological diversity and special values that inspired the Refuge's establishment. Natural processes continue and traditional cultures thrive with the seasons and changing times; physical and mental challenges test our bodies, minds and spirit; and we honor the land, the wildlife and the native people with respect and restraint. Through responsible stewardship this vast wilderness is passed on, undiminished, to future generations. Oil leasing promotes exactly the opposite of an "untamed arctic landscape" and "undiminished" wilderness.

Alternative A is the only alternative that contributes to conserving fish and wildlife populations and habitats in their natural diversity. Any and all exploration and development activities that result from leasing on the coastal plain will impact the fish and wildlife that have inhabited the area, even if only seasonally or en route during migrations, compounding stresses that are already worsening from global climate change and widespread pollution.

Alternative A is the only alternative that fulfills the international fish and wildlife treaty obligations of the United States, and is a particular violation of agreements with Canada to protect the Porcupine caribou herd. The DEIS fails to fully assess the significant impacts oil leasing and development would have on caribou, especially when caribou are most vulnerable to disturbance—during critical times of calving and raising young. Canada has prioritized protection of the herds range on its side of the border, and oil development in the prime calving grounds of the herd are likely to undermine these efforts.

Alternative A is the alternative that best provides opportunities for continued subsistence uses by local residents, as it is the only alternative that does not directly ensure destruction of some amount of habitat and subsistence resources. Oil leasing and development on the Coastal Plain would add stress at a critical time to caribou and cause caribou populations to decline, which would have significant ramifications over a vast area of Alaska and Canada, and these effects would compound and persist beyond the estimated 130 years of exploitation. The DEIS fails to address this reality and its effects on indigenous people. The discussion in the DEIS addressing environmental justice was severely lacking in depth and breadth, but it is glaring in the appendix section on environmental justice that the Gwich'in communities, those with the very least to gain and potentially the most to lose both physically, through the impacts to subsistence caribou, and spiritually through the desecration of sacred lands, are the most financially disadvantaged to begin with, and by a considerable margin. I understand that the DEIS has not been translated into Iñupiaq or Gwich'in despite local interest in having them so, and that should be rectified.

Alternative A is also the only alternative that ensures water quality and necessary water quantity within the refuge to the best of our ability by not contributing to climate change or diversion of water movements.

Broadly, the DEIS fails to describe how oil leasing and development would destroy the Arctic Refuge's ecological integrity and does not thoroughly assess the cumulative effects of oil leasing and development within the Refuge with current and expanding development across the North Slope and offshore in the Arctic region.

On a similar note, oil leasing and development would destroy the wild quality of both the Coastal Plain and a broad swath of adjacent designated Wilderness lands in the Arctic Refuge as the coastal plain is so highly visible from so much of the uplands on the north side of the Brooks Range. The DEIS fails to truthfully explain what would be lost by opening the Arctic Refuge to oil leasing and development.

The DEIS significantly underestimates the amount of carbon pollution that oil leasing and development would add to the atmosphere and fails to truthfully address the implications of exacerbating the climate crisis, globally and specifically in the arctic habitat that the Arctic Refuge was created to protect. The general discussion about potential greenhouse gas emissions and the tables regarding comparative greenhouse gas emissions are laughable as an attempt to trivialize the impacts of the proposed development. Analogously, around 55,000,000 people on earth die every year, and 385,000 of those deaths were murders in 2016. But a murderer attempting to trivialize their crime by stating they were responsible for a mere 0.0000026 murders and 0.00000002 deaths of the year would certainly fail to sway any jurors. Climate change threatens all aspects of life on Earth as we know it and its treatment in the DEIS is woefully inadequate.

Fresh water is relatively limited on the Refuge Coastal Plain, however the DEIS does not adequately assess the impacts that industry's water use would have on fish and wildlife. Oil development is extremely water intensive while Alaska's North Slope is essentially an arctic desert when it comes to precipitation. The watersheds feeding the coastal plain of the Arctic Refuge are very small in area. There is simply not enough water in the main streams to provide adequate flows for resident and anadromous fish population and water thirsty development. Impoundments and alterations to surface water movement atop permafrost caused by roads and pads have widespread and unpredictable implications for the micro and meso habitats of the coastal plain and long term implications for accelerating thaw of underlying permafrost. The effects upon permafrost and localized melting that will then spread resulting from compaction of soils during exploration and development activities are not addressed in a meaningful way.

The economic justifications for leasing and development in the coastal plain are misleading. The legislation establishing this leasing program projected outrageously unrealistic revenue for the federal government. As an Alaskan I have observed our congressional delegation and overall body of our state government are either honest and very gullible or are willing partners in mass deception campaigns orchestrated by oil interests, which isn't surprising for a state stuck in a perpetual colonial exploitation condition. This leasing program is about absolute power of oil companies to gain access wherever to any part of our nation they want, not saving Alaska's industry. I know a number of individuals working in North Slope oil fields as operators, engineers, and geologists who have told me generally about the 50 year and even 100 year development plans for the areas already developed regardless of any expansion of the industry into new territory.

I would appreciate it if the following questions would be addressed in the next draft of the EIS:

What has been done recently or will be required of lease purchasers to assess baseline permafrost conditions and hydrology, and the effects upon soil, surface water movement, and permafrost stability of compaction and impediments to water flow caused by gravel pads, roads, etc? How many species of ground nesting birds rely on the habitats created by the patterns of surface water and vegetation created by such factors as permafrost polygons and millenniums old game trails that could be altered by disturbance from development? How would industry effects upon local habitats and wildlife be monitored?

How accurately has the extent and depth of the glacier ice found at Kaktovik in 2008 (see <https://www.alaska.edu/files/epscor/newsletters/2009-spring-newsletter.pdf>) been mapped and how can infrastructure on top of rotten glacial ice be expected to be stable?

What recent baseline data is there for stream flows and water chemistry in streams crossing the coastal plain, trends as the climate has warmed, and responding trends of resident and anadromous fish populations and health? How would impacts of exploration and development be assessed and monitored?

Have there ever been complete inventories taken of polar bear denning sites on the coastal plain? What trends have been revealed? What techniques have been used and how accurate are they? How would impacts from oil activity be assessed?

What baseline data for human health has been gathered? What would be required of lease holders to monitor and mitigate any potential health impacts?

Finally, for all these shortcomings and many others the DEIS clearly fails to fulfill the requirements of the National Environmental Policy Act (NEPA), and therefore BLM cannot authorize leasing.

Thank you for your consideration of these comments.

Sincerely,

Kaarle Strailey
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