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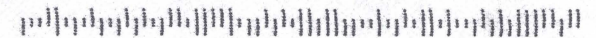
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Coastal Plain Oil & Gas Leasing Program EIS  
222 West 7th Avenue, Stop #13  
Anchorage, Alaska 99513-7504

99513-750413



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January 30, 2019

Coastal Plain Oil and Gas Leasing Program EIS  
222 West 7th Avenue, Stop #13  
Anchorage, Alaska 99513 -7504

Dear Sir/Madam,

I have reviewed the programmatic Draft EIS and supporting documents on the BLM's very accessible website. I found the document easy to navigate and read, with clear maps, figures and charts. I have spent time rafting and flying over the Arctic National Wildlife Refuge (NWR) and know it as an exceptional place with irreplaceable natural values. I have also worked for the Bureau of Land Management and other Federal land management agencies and understand the difficulty of balancing competing multiple uses. Congress gave you an impossible task of leasing 400,000 acres for oil and gas development while maintaining compatibility with purposes of the Arctic National Wildlife Refuge, of which the Coastal Plain is part.

The Draft EIS does not adequately describe or analyze the significant impacts that oil and gas development will create for birds and other wildlife. It is unfathomable how the "action" alternatives (B, C, and D) could meet the intent of PL 115-97 to cover no more than 2,000 surface areas of the Arctic Coastal Plain with development and production facilities. The Draft EIS doesn't explain how oil and gas activities could be kept within this maximum given that between 66 and 100% of the Arctic Refuge Coastal Plain's 1,563,500 acres would be open to lease. Applying the 2,000 acreage limit to the total number of acres covered by production and support activities *at any one time* and not counting land formerly containing production and support facilities (Page 1-6) is a deliberate manipulation of the NEPA process. As is excluding gravel mines and pipelines from the 2,000 acreage limit. "Reclaimed" facilities, gravel mines, pipelines, ice roads will all directly affect wildlife and fragment habitats, thus impacting additional surface area not covered by facilities. None of these cumulative or indirect impacts are adequately addressed in the DEIS. Additional specific comments are as follows:

Alternative A is dismissed on page 1-1 because it would not comply with Section 20001 of PL 115-97 requiring the BLM to establish and administer a competitive oil and gas program on the Coastal Plain area within the Arctic Refuge. Likewise, Alternatives B and C should be dismissed because the exploration, development, production and related activities stemming from oil and gas leasing would be in direct conflict with at least two of the Refuge Purposes stated on Table 3-31 (page 3-209): (i) to conserve fish and wildlife populations and habitats in their natural diversity, and (ii) to fulfill the international fish and wildlife treaty obligations of the US. Alternatives B and C probably also conflict with Refuge Purposes (iii) and (iv) regarding providing subsistence rights and ensuring water quality, but since my professional expertise is in natural resources I'll focus on wildlife issues that concern me.

For all but a couple of species (e.g., caribou and polar bear) the DEIS lacks baseline data and scientific analysis of impacts as required under the National Environmental Policy Act (NEPA). This is especially true regarding the proposed project's effect on nesting and migrating shorebirds. Much of my career was spent monitoring and managing habitat for shorebirds in the Atlantic and Pacific flyways. Shorebirds are in decline worldwide and the project area is used by shorebird species that migrate to all parts of the U.S. and to all continents. Page 3-88 of the Draft EIS cites recent surveys where an estimated that 230,000 shorebirds occupied the program area during the breeding season. Table J-9 lists thirteen shorebird species with some special status or at risk factor (e.g. conservation concern, sensitive or red list species) that occur on the Arctic Refuge Coastal Plain. These species are facing population-wide or hemispheric



declines, they are protected by international treaties, and their well-being is a Refuge Purpose. Given that virtually all of the Project Area is classified as wetlands (Page 3-67 and 68), the entire project area is potential habitat for nesting shorebirds (as well as waterfowl and other waterbirds). Furthermore land formerly containing production and support facilities, Alternatives B, C, and D contain no stipulations or mitigating measures to protect nesting shorebirds. Lease Stipulation 4 (Page 2-7), whose purpose is to "Protect fish and wildlife habitat, including that for waterfowl and shorebirds, ...." only restricts oil/gas development in a miniscule subset of shorebird habitat along the coast. And even in this small portion of the vast (unprotected) shorebird habitat, only oil drill pads are restricted- but infrastructure that supports the drill pads could be permitted. The vast majority of shorebird nesting, resting and migration habitat would be available for oil and gas leasing and untold habitat destruction without protection or mitigating measures. The DEIS fails to analyze or disclose these impacts, which would be global in scope and significant at a population level. Neither the population impacts to at-risk shorebirds species nor site-specific impacts of oil/gas exploration and development are quantified.

Alternatives B and C fail miserably in protecting the Porcupine Caribou herd's prime calving area and therefore do not comply with purposes of the Arctic NWR. Under Alternative B, the entire Coastal Plain would be open for lease including all 721,200 acres of caribou calving area. The only restriction would be during the calving period when there would be a halt in "construction activity using heavy equipment between May 20 and June 20". All other exploration, development, and production activities would be allowed to take place during the time with mothers and young are most vulnerable. Page 3-114 states that, "Displacement lasts from calving (late May to mid-June) up to when calves are approximately 3 weeks of age (Lawhead et al. 2004; Haskell et al. 2006). " So under Alternative B, heavy construction could resume during the post-calving period, when calves are also vulnerable to disturbance. Under Alternative C the majority (606,200 acres) of primary calving area may be offered for lease (Page p-13), with more restrictions to protect calving areas (No Surface Occupancy - NSO). However seismic exploration and associated human activities in this important area could still impact caribou. Furthermore, it is unclear if infrastructure to support the oil development could be allowed in the NSO area.

Polar Bears, which are facing unmitigated threats due to loss of sea ice cover and thickness caused by global warming (page 3-124), would be dealt yet another blow to their population if either Alternatives B, C, or D are implemented. Eighty percent of the Arctic Refuge Coastal Plain has been designated Critical Polar Bear Habitat (Table 3-22) and the "the occurrence of maternal dens has been disproportionately high in the high-(hydrocarbon) potential zone, where 54 percent of known dens occurred in 30 percent of the potential habitat mapped," (page 3-134). Under Alternative B the vast majority of Critical Terrestrial Polar Bear Denning Habitat (Maps 2-1 and 3-24) would be open to oil and gas leasing/development with buffers around known dens. Since polar bears move their dens from year to year, and some dens may not be discovered in time it seems probable that vehicles or other activities will disturb denning polar bears, impacts that the DEIS fails to adequately disclose. Excluding snow or ice roads from counting toward the 2,000 acre maximum surface disturbance limitation further grossly underestimates the project's impacts on polar bears.

Pages 3-144 to 3-149 compare and quantify the magnitude of the impacts to polar bears between Alternatives B, C, and D. Alternatives B and C are clearly not compatible with purposes of the Arctic NWR because the vast majority of Designated Critical Polar Bear Habitat would be open to oil and gas development. Alternative D is only marginally better. More critical habitat would be closed to leasing or designated NSO, but a large area of preferred denning habitat in the west portion of the coastal plain would be open to oil/gas leasing/development. None of the Alternatives consider the cumulative effects of melting sea ice, which is causing the polar bears to rely more on terrestrial denning habitat (page 3-128).

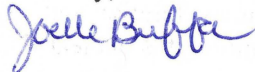
I am also concerned with BLM having the qualified personnel- especially wildlife biologists and natural resource specialists - available to monitor, evaluate and enforce this program. BLM has a chronic lack of funding for biologists and monitoring. Delays in budget approval from Congress, government shut-downs such as we are recently experienced, and low prioritization of the non-extractive uses of BLM's mission could derail the best of intentions to manage the program properly.

In conclusion all of the "Action Alternatives" (B, C, and D) would allow seismic exploration over the entire coastal plain, therefore causing irreversible and irretrievable impacts to and losses of birds, terrestrial and marine mammals, and conflict with purposes of the Arctic NWR. I therefore think that the only option is for BLM to select Alternative A.

Although it's hard for me to visualize an alternative whereby the coastal plain of the Arctic Refuge could be opened to drilling in an ecologically sound way, if the BLM feels compelled to evaluate oil and gas leasing here, the DEIS needs to diligently analyze a full range of alternatives as required by NEPA. Since many of the potential impacts can't be identified or quantified because the proposed action lacks precedent and the risks are great, the BLM could consider developing an adaptive management alternative AFTER taking more time to undertake baseline studies and realistically determine the number of surface acres impacted by such a project. This alternative could include opening a very small percentage of the coastal plain, in a phased approach with monitoring (funded by the lessees) between phases.

Thank-you for the opportunity to provide comments, and please add them to the official record.

Sincerely,



Joelle Buffa