

LIN DAVIS
3099 NOWELL AVE
JUNEAU, AK
99801



ATTN: Coastal Plain Oil & Gas Leasing Program
222 WEST 7TH AVE, STOP #13
ANCHORAGE, AK 99513
EIS

Feb 26, 2019

Attn: Coastal Plain Oil and Gas Leasing Program EIS
222 West 7th Ave, Stop #13
Anchorage, AK 99513

Dear BLM EIS Program Evaluators:

I am a 26 year resident of Alaska. I have traveled through part of ANWR and spoken to Gwich'in residents of Arctic Village. I found them all very opposed to petroleum development in the ANWR Wilderness. Unfortunately I feel their voices are not being heard.

I urge you to re-do the draft EIS to **comply with legal rules:**

- 1) Please comply with human rights and subsistence rights of the Gwich'in. The EIS does not adequately consider these rights. "The Gwich'in have a cultural and spiritual connection to the Porcupine caribou. Our Elders and our traditional knowledge tell us that taking care of the land keeps the caribou healthy and the caribou in turn keep our people healthy," says Bernadette Demeientieff, director of the Gwich'in Steering Committee.

The network of roads, ice roads, pads, noise, lights, activity, seismic impacts, and stinky odors endanger the calving Porcupine caribou. Denning winter polar bears may also be harmed and their ability to survive additionally diminished.

The DEIS does not examine this likely unacceptable harm to the Gwich'in, their culture and subsistence, and the likely harm to the Porcupine caribou and polar bears.

One accurate measure of our democracy is how carefully we protect vulnerable beings. ANWR honors one of the last places American Native people can live subsistence lives. In sacred trust we have the American duty of safe harbor for the Gwich'in ancient home. The 7,000 Gwich'in are 100% opposed to oil and gas development.

The dismal history of US government harm toward Native Americans compels us to carefully consider the Gwich'in and their rights,

- 2) In 1960 ANWR and the 1002 Coastal Plain were set aside as wilderness. They are a biological Smithsonian. All forms of life in ANWR have devised stunning ways of survival. Each animal and plant reveals a story of adaptation made for tender telling around the campfire. Even the stones sort themselves in patterned ground – pingos, palsas, frost boils, felsenmeer and

strangemoors. This refuge designation has merit and should not be revoked or damaged by oil companies.

There is a misconception that all Alaskans support drilling in ANWR. Look at the recent crowds in Fairbanks and Anchorage protesting and testifying on behalf of oil-free ANWR.

Since birds from all the states migrate to ANWR for breeding, many Americans want to preserve the Coastal Plain and prohibit development. It appears that the DEIS minimizes the impact on millions of birds and loopholes will likely allow oil/gas development despite great harm to birds.

As fragile as ANWR is, its refuge status has also been in a fragile legal status for decades. The forces of money and corporate power try to bully their way into places that cannot be measured in money. And right now the BLM is rushing the comment period. 680,000 people commented on the Scoping EIS. The draft EIS published 12/28/18 does not reflect those concerns, as it legally should.



So EIS revisions are needed. Here are some more deficiencies in the EIS:

- 1) There is no map to show the public the extent of oil pads, ice roads, pipelines, gravel mines and other infrastructure. Likely the acres allowed by Congress would not include other extensive infrastructure needed for the project. Likely a convenient loophole allows more than the public thinks will be developed.
- 2) The EIS does not address the current high rate of climate change in Alaska and the dangers it poses to oil and gas infrastructure.
- 3) Nor does it address the critical concern that oil and gas development in ANWR will exacerbate climate change by adding great amounts of black carbon from all the combustion activities inherent in just the development phase. The DEIS does not add in the burning of the oil extracted which is likely equivalent to the chugging of 16 new coal power plants. The planet cannot afford any more coal plant emissions.
- 4) The DEIS does not discuss ways of minimizing the area to be leased, developed and drilled. Careful readers of the EIS have noted that the list of four DEIS alternatives all grab more acres for development than are required by the Tax Act regarding lease sales. Only 400,000 acres are required by the Tax Act but Alternative D grabs 1 million acres or 66% of the Coastal Plain. This confuses the public.

- 5) The EIS allows oil companies to obtain lots of waivers. Lots! As a 26-year resident of Alaska, I have seen oil companies appear to do whatever they want. And generally the State of Alaska does not interfere with their power.

And just this week, Alaska's governor, Dunleavy fired Hollis French from the non-partisan Alaska Oil and Gas Oversight Commission. This is a clear sign that Dunleavy is happy to give oil companies anything they want. Your BLM federal oversight is even more important.

And we Alaskans know that oil spills occur all the time. Possibly 400 a year. We remember 2006 when BP leak detection failed in Prudhoe, and an oil worker smelled fuel-scented wetlands. 260,000 gallons leaked into the tundra. And we remember the 2017 Hilcorp natural gas oil leak into Cook Inlet. This leak went on for months and likely harmed the beluga whale habitat. No workers or technology could shut it off. Aging pipelines and the inlet contains more than a 1000 miles of pipe and 16 offshore oil and gas platforms operating in extreme weather and temperatures and earthquakes and buried in ice. Later it was discovered that an 8-inch underwater line was sending 210,000 to 310,00 cubic feet of natural gas into the Inlet. Later it was also discovered that this pipe leaked in 2014 for an unknown amount of time. A helicopter discovered the Hilcorp leak. Their leak detection failed. Hilcorp did not pay to study damage to the belugas.

This brings us to the point that oil spills do not belong in refuges. Clean up is not profitable. When crew and equipment get weathered in, days go by and the leaks have their way. Unprofitable use of workers and equipment does not always rise to the high priority list for Alaskan oil companies.

- 6) The EIS draft has lifted sections from NPR-A in Northwest Alaska. NPR-A has striking differences from ANWR. One size does not fit all. The EIS must be rewritten to accurately depict the scientific uniqueness of ANWR's micro-climate, animals and the narrow land strip of the 1002 Coastal Plain.

Likely the imposed hurried timelines have caused your staff to take shortcuts. Please have staff pay special attention to the scientific differences between the ANWR caribou and the NPR-A caribou. The draft EIS says protection of ANWR caribou is paramount but the EIS has not made an adequate case for attaining that goal.

- 7) A project this complex and so important to so many Americans must have more time for public comment and for BLM analysis. The month long federal shutdown cut into the work time of BLM staff, and Alaskans and other Americans could not reach BLM with questions about the DEIS. The

Trump Administration has improperly applied a one-year time limit to the EIS contractor. That is blatantly an undemocratic way to steamroll this controversial project. Some senators have asked for much more public comment time.

- 8) Water Quality: the DEIS has not adequately dealt with impacts to water. According to Alaskan scientists who have studied the DEIS, there are special concerns about water quality in ANWR. Different from Western Alaska, water is scarce in the Coastal Plain especially in winter. Ice roads require a lot of water, a million gallons for every mile. Each well requires 500,000 to 1.9 million gallons of water, and each pad will drill 30 wells. Likely 540 wells will be drilled in the 1002, and the US Fish and Wildlife Service has lodged concerns about the cumulative effects of all stages of oil/gas development on the streams, rivers, springs and therefore detrimental all habitats of fish and wildlife.


The DEIS has not thoroughly considered these significant impacts. The Refuge designation of ANWR through ANILCA specified that water quality and water quantity be protected as a way to conserve wildlife and fish.

The lease sale very likely cannot adhere to ANILCA. The DEIS likely fails this legal requirement.

- 9) Are the economics really there to justify development? The DEIS shoots in the dark an estimate of \$1 billion for Alaska and \$1 billion for the US. Many economists and analysts do not feel that ANWR oil/gas development is viable. The rocket ascendancy of renewables and the vision of Alaska showing the world how the arctic can transition to geothermal, hydro, wind, tides and solar, urge a NO vote for ANWR development. Could be a total waste. Why go down a backward path. Why wreck a treasured area and harm the Gwich'in?

Thank you for considering these points.

Sincerely,



Lin Davis
3099 Nowell Ave
Juneau, AK 99801