

Administrative Final EIS, for BLM and Cooperating Agency Review**To BLM and Cooperating Agency Reviewers:**

The **Administrative Review Final EIS**, is intended for BLM and cooperating agency review. (Please do not distribute.)

- Please complete the MSWord comment matrix (provided at the end of these instructions) by saving this file with a new file name including your last name (for example, name your comment matrix "I40L6318F0003_AdminFinalEIS_BLM-agency-cmnts_20190722_HayesN.docx"), and then fill out your comments on the document.

How to Provide Valuable Feedback**Commenting:**

For each comment, please fill in the following information under the appropriate column heading in the matrix:

- ✓ Page number, line number, or table number on which you are commenting. **The page and line numbers in the PDF file MUST be used.**
- ✓ Your comments:
 - **Your comments must be specific and provide exact changes to the text.** Please be unambiguous, clear, and directive, with exact wording changes stated. Ambiguous comments, such as "What?," "Poor," or "Is this right?," are not helpful and will not be considered.
 - If you have the same comment more than once, do not refer back to a previous comment number. Instead, please copy and paste your comment to a new row in the matrix and provide the specific page number, etc.
 - If you need additional space for comments, click in the table cell where you would like to comment, select the *Table* menu, *Insert*, and either *Rows Above* or *Rows Below*.
- ✓ Reviewers should keep this in mind, and constructive comments should focus on the following:
 - Adequacy of addressing the purpose and need.
 - Missing information, such as tribal, local and state planning documents or other readily-available data.
 - Inconsistencies between stipulations and required operating procedures in the alternatives.
 - Adequate illustrations of the alternatives in the maps.
 - Adequacy and appropriate level of direct, indirect, and cumulative impact analysis. Provide specific changes to improve analysis and note any gaps in logic.
 - Consistency of impact analysis between resource topic areas.

**COASTAL PLAIN OIL AND GAS LEASING PROGRAM
ENVIRONMENTAL IMPACT STATEMENT**

BLM and Cooperating Agency Comments on Administrative Final Review EIS

Cmt #	Page #	Row # or Line #	Reviewer Name/ Agency	Comment	A/R/M¹	Remarks / How Resolved (Reviewers: Leave this column blank)
1.			North Slope Borough	On March 13, 2019, the Borough submitted comments on the Draft Environmental Impact Statement (DEIS) for the Coastal Plain Oil and Gas Leasing Program (Leasing Program). A copy of that comment letter is attached to this document. The Preliminary Final Environmental Impact Statement (PFEIS) adequately addressed many of the Borough's comments on the DEIS. However, the PFEIS does not adopt all of the Borough's proposed revisions. The Borough incorporates by reference those comments here and requests that BLM adopt those requested revisions in the Final Environmental Impact Statement (FEIS).		
2.			North Slope Borough	<p>The Borough requests that the FEIS be clarified to clearly exempt road and local infrastructure development from any restrictions under the Leasing Program.</p> <p>Specifically BLM should ensure that the Leasing Program allows for road and local infrastructure development for the community of Kaktovik. Road connectivity would benefit Kaktovik by lowering the cost of goods and also reducing development costs in the Coastal Plain. Other benefits of a road connecting Kaktovik to future oil and gas facilities include greater access for subsistence activities and increased employment opportunities for local residents.</p> <p>Increasing road connectivity is also consistent with the Arctic Strategic Transportation and Resources (ASTAR) project being undertaken by the Borough and Alaska Department of Natural Resources to identify, evaluate, and advance opportunities in North Slope communities through responsible infrastructure development.</p>		

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3.			North Slope Borough	<p>The Borough requests that the FEIS be clarified to clearly exempt local energy infrastructure from any energy development restrictions.</p> <p>Additionally, BLM should promote local energy development as a benefit associated with the Leasing Program. BLM should allow for the construction of infrastructure to supply natural gas to Kaktovik. Several of our communities, such as Utqiagvik and Nuiqsut, have benefited from access to natural gas provided by nearby development projects.</p> <p>BLM should encourage lessees on the Coastal Plain to work with the Borough and the City of Kaktovik to provide the community with access to natural gas resources.</p>		
4.	ES-5	Table ES-2	North Slope Borough	Table ES-2 states that “[a]nother assumption is that 3D seismic studies would have been completed by the time the ROD is published.” This assumption appears to be an inaccurate assumption and also inconsistent with a statement concerning the timing of 3D seismic studies on B-10. Please clarify.		
5.	2-6		North Slope Borough	<p>The Borough requests that Alternative B Lease Stipulation I within the FEIS be modified to only include the following river setbacks: (1) 0.5 miles on either side of the Okpilak River, the Hulahula River, the Aichilik River, and the Jago River; (2) 0.5 miles on the Staines-Canning River along the east side of the Coastal Plain border; and (3) 1 mile around Fish Hole One.</p> <p>The setbacks described in the PFEIS are overly restrictive and are inconsistent with the congressional mandate of providing a competitive leasing program. The proposed revisions to the river setbacks in Alternative B Lease Stipulation I will be protective of the environment while providing for a competitive leasing program.</p>		

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6.	2-10 – 2-11		North Slope Borough	<p>The Borough requests that Alternative B Lease Stipulation 4 be removed because it is overly burdensome and inconsistent with the congressional mandate of providing a competitive leasing program.</p> <p>Instead, the imposition of no surface occupancy restrictions should be evaluated in subsequent phases of the Leasing Program and should be based on site-specific impacts. Development activities at Prudhoe Bay demonstrate that production in coastal areas is not harmful to wildlife and the environment. In addition, the barrier islands along the coast of the Beaufort Sea provide additional protection for development in coastal areas by reducing erosion potential.</p> <p>The Borough also opposes this Stipulation because it could shift oil and gas development offshore into state waters. Such an occurrence would increase the risks associated with oil and gas leasing, such as potential impacts to subsistence species.</p>		

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7.	2-16		North Slope Borough	<p>The Borough requests that Alternative B Lease Stipulation 9 be modified to require that before conducting open water activities, the lessee/operator/contractor be required to consult with the Alaska Eskimo Whaling Commission, the Borough, and local whaling captains' associations to minimize impacts on subsistence whaling and other subsistence activities of the communities of the North Slope. This requirement is currently included in Alternative C Lease Stipulation 9.</p> <p>The Borough also requests that this requirement be expanded to apply to any activity that could potentially impact subsistence whaling and other subsistence activities of the communities of the North Slope.</p> <p>These requirements are necessary to protect subsistence whaling and other subsistence activities.</p>		
8.	2-19		North Slope Borough	<p>The Borough requests that ROP I be clarified to prioritize the use of a local landfill to disposal of all solid waste and garbage.</p> <p>The Borough intends to create a service area and landfill in the Coastal Plain. The Borough is interested in establishing a service area to provide utility services to industry in the Coastal Plain, similar to the services we provide in Service Area 10 (Prudhoe Bay), which would help consolidate infrastructure and operations. A landfill will be needed in the Coastal Plain to dispose of waste. Without a landfill on site, waste disposal costs would be unnecessarily burdensome, and transporting waste out of the Coastal Plain presents potential environmental concerns.</p>		
9.	2-19		North Slope Borough	The Borough requests that the language be revised to change "Arctic Refuge subsistence users" and "Arctic Refuge recreationists" to "Coastal Plain subsistence users" and "Coastal Plain recreationists."		

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10.	2-22		North Slope Borough	The Borough requests that the design and implementation of the monitoring study of contaminants in subsistence foods should be coordinated with the Borough's Department of Wildlife Management.		
11.	2-24		North Slope Borough	<p>The Borough requests that the ROP 10, subparagraphs c and d, within Alternatives B and C be deleted. These obligations are overly restrictive and unnecessary. The Borough requests that these subparagraphs be replaced with a new subparagraph which reads as follows:</p> <p>“Between October 30 and April 15 of any year, a lessee/operator/contractor working in polar bear denning and seal birthing habitat would conduct a survey for polar bear dens and seal birthing lairs, in consultation with USFWS or NMFS, or both, as appropriate, throughout the planned area of activities and before initiating activities.”</p> <p>This would be consistent with the NPR-A IAP and would provide adequate protection for the species.</p>		
12.	2-30		North Slope Borough	The Borough requests that ROP 22 be revised to prioritize overland pipeline crossings.		
13.	2-33		North Slope Borough	The Borough requests that ROP 29 be revised to allow the lessees/operators/contractors to rely upon existing cultural and paleontological resource surveys upon approval of the Borough. The Borough has a significant amount of information on cultural and paleontological resources which will inform the need and scope of additional surveys.		
14.	2-34		North Slope Borough	The Borough requests that ROP 33 be revised to require the lessees/operators/contractors to provide GIS data of new infrastructure development to the Borough, in addition to BLM and the State of Alaska.		

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15.	2-35		North Slope Borough	The Borough requests that ROP 35 be revised to require the lessees/operators/contractors to post a bond to ensure adequate funding for spill response, cleanup, and eventual decommission, remediation, and removal.		
16.	3-10 – 3-22		North Slope Borough	<p>In the PFEIS, BLM has not considered the impacts of gas flaring associated with oil and gas exploration and production in its analysis of outdoor air quality.</p> <p>The Borough requests that BLM include and analyze the potential effects associated with gas flaring emissions sources. In addition, the Borough requests that BLM consider potential emissions associated with wildfires in Alaska. Additionally, the Borough requests that BLM consider the relationship between outdoor air quality and any corresponding impacts on indoor air quality.</p> <p>In addition, baseline air quality data are needed for Kaktovik and the Coastal Plain in order to monitor the effects of development on air quality. These baseline data must be obtained before construction activities begin.</p> <p>The Borough requests that monitoring stations be constructed in: (1) Kaktovik; (2) in the portion of the Coastal Plain where development might occur; and (3) downwind of possible development.</p> <p>The Borough requests that a public agency or an independent third party operates these air monitoring stations to alleviate potential concerns raised by our residents regarding industry-sourced air monitoring data.</p>		

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17.	3-10-3-22		North Slope Borough	BLM is working on a Cumulative Alaska North Slope Air Quality Regional Model, to assess the cumulative effects of BLM-authorized oil and gas development on the North Slope, including on the Coastal Plain. The Borough requests that any results (even if preliminary) from this model be analyzed in the FEIS or, if not available by that time, in any subsequent National Environmental Policy Act documents relating to BLM activities on the North Slope.		
18.	3-38 – 3-46		North Slope Borough	<p>In its discussion of geologic hazards, the PFEIS acknowledges the impacts associated with coastal erosion and storm surge. The analysis does not provide a temporal scale, which makes it difficult to evaluate the potential impacts. The document is unclear as to whether the data reflect recent higher and increasing rates of coastal erosion associated with an absence of sea ice and more impactful weather events or more long-term, multi-decadal averages. Without this temporal reference point, it is difficult to determine whether the rate of coastal erosion is increasing in the short-term and should therefore be a consideration with respect to areas offered for leasing and the location of oil and gas infrastructure.</p> <p>The Borough requests that for the lease of any lands in coastal areas, that BLM include the site-specific rates of erosion and require that any lessee/operator/contractor locate infrastructure outside the maximum distance of erosion that is projected to occur during the life of any proposed development.</p>		

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19.	2-40		North Slope Borough	<p>The Borough requests that the third sentence of Lease Notice 2 be revised as follows: "BLM would not approve of any action that would result in the take of marine mammals until it completes its obligations under application requirements of the MMPA."</p> <p>Existing language that requires compliance with the applicant requirements for any action that may affect a marine mammal is inconsistent with the requirements of the MMPA.</p>		
20.	3-72	20-22	North Slope Borough	The Borough requests that BLM provide additional analysis to support its conclusion that, under all action alternatives, there are no anticipated potential long-term effects on lakes and ponds from ice roads, ice pads, or ice bridges, and that there is adequate water for withdrawal.		
21.	3-76		North Slope Borough	The PFEIS does not address PFAS or the emerging science regarding the health effects of these substances. PFAS are included in substances utilized by the oil and gas industry, most prevalently in firefighting foams. Because PFAS have been recognized as an emerging contaminant issue in the Arctic, the Borough requests that BLM include an analysis of the potential effects associated with these chemicals.		
22.	3-89	12-14	North Slope Borough	The Borough requests that a reference be provided for the referenced long-term study of the effects of ice roads in the NPR-A and its conclusion of minimal effect.		

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23.	3-100	34-43	North Slope Borough	<p>The Borough notes that a more recent study along the Spine Road in Prudhoe Bay found that 50 meters off the road "[c]lear surface mineral horizons up to 18 cm thick occur near the southwest side of the road and up to 10 cm thick on the northeast side," and that 200 meters from the road "the underlying organic material have a gray color indicating leached dust." D.A. Walker, M. Buchhorn, and M. Kanevskiy, et al., Infrastructure-Thermokarst-Soil-Vegetation Interactions at Lake Colleen Site A, Prudhoe Bay, Alaska. Alaska Geobotany Center Data Report, AGC 15-01, 92 pp. Institute of Arctic Biology, University of Alaska Fairbanks, Fairbanks, AK (2015).</p> <p>The Borough requests that the PFEIS be updated to reflect this scientific information.</p>		

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24.	3-172	13	North Slope Borough	<p>The Borough requests that the following references pertaining to climate change impacts on beluga whales be considered in this section:</p> <p>D.D.W. Hauser, K.L. Laidre, H.L. Stern, S.E. Moore, R.S. Suydam, and P.R. Richard. 2017. Habitat selection by two beluga whale populations in the Chukchi and Beaufort seas. PLOS ONE 12(2):e0172755. doi:10.1371/journal.pone.0172755.</p> <p>D.D.W. Hauser, K.L. Laidre, S.L. Parker-Stetter, J.K. Horne, R.S. Suydam, and P.R. Richard. 2015. Regional diving behavior of Pacific Arctic beluga whales <i>Delphinapterus leucas</i> and possible associations with prey. Marine Ecology Progress Series 541:245-264.</p> <p>G. O'Corry-Crowe, A.R. Mahoney, R. Suydam, L. Quakenbush, A. Whiting, L. Lowry, and L. Harwood. 2016. Genetic profiling links changing sea-ice to shifting beluga whale migration patterns. Biology Letters 12: 20160404. http://dx.doi.org/10.1098/rsbl.2016.0404.</p> <p>K.M. Stafford, M.C. Ferguson, D.D.W. Hauser, S.R. Okkonen, C.L. Berchok, J.J. Citta, J.T. Clarke, E.C. Garland, J.Jones, and R.S. Suydam. 2016. Beluga whales in the western Beaufort Sea: current state of knowledge on timing, distribution, habitat use, and environmental drivers. Deep Sea Research II. (http://dx.doi.org/10.1016/j.dsr2.2016.11.017).</p>		

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25.	3-173	1-3	North Slope Borough	The PFEIS overstates the potential impacts of climate change on marine mammal species. Specifically, the PFEIS states that "[t]he ongoing declines in the extent and duration of sea-ice cover present the greatest sources for possible population-level impacts on marine mammals over the next 20-40 years, although the impacts are not entirely clear and may vary among species." Contrary to this statement, it is clear that potential changes in sea ice in the next 20-40 years are not likely to have negative population level effects on the bowhead whale based, in part, on the long lifespan of the species. In addition, while there have been observed changes in sea ice extent and duration, there have been no detectable corresponding reductions in the population size or health of bearded and ringed seals.		
26.	3-198	24-28		The Borough requests that the sentence that reads "Under the Inuvialuit-Inupiatq Agreement . . . considerations of further adjustments may be needed if the population continues to decline to lower levels." This sentence is speculative and superfluous. The Borough strongly objects to any statement by BLM in this document that further reductions in harvest quotas may be necessary.		

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27.	S-602	Row 172	North Slope Borough	<p>BLM's response is nonresponsive to the Borough's comment. The Borough's comment was focused on polar bear habituation and not on the need for ITRs for seismic activities.</p> <p>The Borough requests that BLM provide additional information, including descriptions of current polar bear behavior in areas with existing oil and gas facilities and in the area around the community of Kaktovik. In particular, BLM should consider whether concentrations of polar bears in and near Kaktovik-such as at the "bone pile," an area frequented by tourists that contains the discarded remains of subsistence harvested bowhead whales which attracts polar bears-demonstrate that those animals are habituated to noise and light and are more likely to be attracted to human activity than polar bears in other areas. In addition, we note that polar bears appear to be attracted to oil, anti-freeze, foam snow-machine seats, and other waste. BLM should include a discussion of mitigation measures that have been successfully used by industry to avoid or reduce attracting and habituating polar bears.</p>		
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