Coastal Plain Oil and Gas Leasing Program EIS July 22, 2019

### 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 “140L6318F0003\_AdminFinalEIS\_BLM-agency-cmmts\_20190722\_HayesN.docx”), and then fill out your comments on the document. Special Instructions

### 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.

| **Cmt #** | **Page #** | **Row # or Line #** | **Reviewer Name/ Agency** | **Comment** | **A/R/M1** | **Remarks / How Resolved *(Reviewers: Leave this column blank)*** |
| --- | --- | --- | --- | --- | --- | --- |
|  | 3-17 | 14-29 | EPA | We appreciate that some additional information has been added to the Pre-FEIS text to clarify the conclusion, based on past analyses for other projects, that future development projects in the Coastal Plain are unlikely to result in violation of the air quality standards and air quality related values. However, we continue to be concerned by the reliance on past studies, rather than development of a specific, qualitative air quality analysis for the proposed action. We have previously mentioned this recommendation for a specific qualitative analysis for this EIS at both the scoping stage and at the DEIS stage. |  |  |
|  | S-26 | #4 | EPA | Regarding AQRV impacts, in response to comments #14 and #15 of EPA’s letter (pg. S-26), the BLM states Air Quality Related Values (AQRV) thresholds in the FLAG 2010 document are not applicable to the Arctic National Wildlife Refuge. This infers the concern noted by the EPA regarding nitrogen deposition in the Refuge is unfounded, because the thresholds recommended in FLAG 2010 are not applicable to Class II areas, such as ANWR. To support this position, the BLM provides statements from the preface of the FLAG 2010 document that outline the purpose of the guidance document. However, in the Pre-FEIS, the BLM does not also include the important footnote from the quoted section of the FLAG 2010 document that states, “Nevertheless, the FLMs are also concerned about resources in Class II parks and wilderness areas because they have other mandates to protect those areas as well. The information and procedures outlined in this document are generally applicable to evaluating the effect of new or modified sources on the AQRVs in both Class I and Class II areas, including the evaluation of effects as part of Environmental Assessments and/or Environmental Impact Statements under the National Environmental Policy Act (NEPA). However, FLAG does not preclude more refined or regional analyses being performed under NEPA or other programs.”  The values presented in the EPA’s comment letter on the DEIS demonstrate that nitrogen acid deposition from development in the Refuge would likely significantly exceed the FLAG thresholds of concern for impacts on sensitive vegetation. The EPA is concerned that significant impacts to AQRVS could occur in the Arctic National Wildlife Refuge due to development at leased areas within the Refuge. Acid deposition could potentially impact sensitive moss, shrubs, grasses and other types of vegetation that are a main source of food for a number of species protected in the Refuge.  In the absence of a robust quantitative air quality analysis for the proposed action, we recommend that FEIS include a preliminary estimate of development and evaluate, based on previous evaluations of development on the North Slope, the range of acid deposition rates expected from development. In addition, we recommend analysis and disclosure of acid deposition impacts on the known vegetation types in the Refuge. |  |  |
|  | 3-20 | 35 | EPA | There appears to be an error in new text inserted describing the level of detail that was included in the GMT2 cumulative air quality analysis related to potential development in the Coastal Plain Leasing Area. We recommend that the sentence be revised to state “… the GMT2 direct emissions did **not** contain the full suite of emission sources described in the RFD…” |  |  |
|  | 3-15 | 1 | EPA | As mentioned, the EPA continues to have concerns regarding air quality impacts from the proposed lease sales in the Coastal Plain. Therefore, we also continue to recommend that the BLM convene an air quality technical workgroup to discuss the air quality analysis. |  |  |
|  | 3-15 | 31 | EPA | As we have previously commented, air impact analyses from several of the North Slope development studies quoted in this section indicated air quality impacts, notably 1-hour NO2, near or exceeding the NAAQS in some alternative modeling cases. These assessments are not accurately represented in the Pre-FEIS.  The possibility of greater emissions under the development of the Coastal Plain compared to the referenced projects indicate the increased likelihood of significant air quality impacts. We continue to recommend that these impacts be analyzed and disclosed for Agency decision makers and the public in the EIS. |  |  |
|  | 3-20 | 12 | EPA | We recommend that the statement that Nuiqsut air quality monitoring may provide a conservative representation of potential coastal plain impacts at the Canadian border be further qualified. For example, prevailing wind direction and local meteorology and topography would have an impact on how well Nuiqsut conditions represent another area. |  |  |
|  | 3-71 | 37 | EPA | We continue to recommend that the EIS disclose potential water resource impacts associated with the Central Processing Facilities. Currently, this potential impact is only briefly mentioned in the Executive Summary and is not analyzed in Section 3.2.10, Water Resources. Some information has been provided in the response to EPA’s previous comments in Appendix S (pg. S-1027, Section S.3.46, comment #16), however, we were unable to locate any additional text in the body of the Pre-FEIS that would address our concerns. We recommend that the FEIS analyze the potential water resource impacts from the CPFs, including describing the potential waste streams from these facilities. Pertinent information would include the likely volume, anticipated contaminants of concern, anticipated disposal method, and potential for discharges to surface waters. |  |  |
|  | 3-359 | 1-4 | EPA | We appreciate the revised text that helps to clarify the discussion of previous VOC sampling conducted in Nuiqsut. For accuracy, we recommend that “screened levels” and “screen levels” in this paragraph be replaced with “screening levels,” or, more specifically, risk-based concentrations or regional screening levels (RSLs). |  |  |
|  | 3-365 | 4 | EPA | We appreciate that additional text has been added describing future potential site-specific air quality analyses, and we continue to recommend refraining from including conclusions based on air quality analyses conducted for previous projects, such as concluding that “all action alternatives are likely to be below applicable air quality standards for all phases of development.” This recommendation is based on our understanding of the air quality analyses conducted for previous projects and the concerns we continue to raise. |  |  |
|  | 3-366 | 27-36 | EPA | We continue to recommend that the BLM not draw conclusions regarding potential air quality impacts to Kaktovik based on air quality analyses conducted for previous projects, for example, the statement that “Based on other oil and gas development on the North Slope, it is unlikely that air emissions during any stage of oil and gas development would reach levels that could increase respiratory or cardiovascular disease rates for Kaktovik residents.” If such broad statements regarding impacts to Kaktovik residents remain in the Final EIS, it would be helpful for decision makers and the public to understand how the distance from the nearest Kaktovik residence to potential oil and gas facility locations compares to the proximity of Nuiqsut to oil and gas facilities analyzed in previous EISs. |  |  |
|  | B-16 | 30-32 | EPA | We appreciate the additional information added to Appendix B Reasonably Foreseeable Development Scenario to clarify how drill cuttings would be disposed during exploration and development phases. However, we note that the document incorrectly states that Class I or Class II disposal wells would be regulated by ADEC. As is correctly described in Appendix D Laws and Regulations, the EPA has the authority to regulate Underground Injection Control (UIC) wells under the Safe Drinking Water Act. In Alaska, EPA directly implements the program for UIC well classes I, III, IV, V, and VI, but has delegated the implementation of the program for UIC well class II to the Alaska Oil and Gas Conservation Commission. If the BLM has questions about the EPA’s regulation of Class I wells, please feel free to contact us for more information. |  |  |
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