

P.O. Box 766
Talkeetna, AK 99676
July 22, 2004

Susan Childs, Bureau of Land Management
Alaska State Office
222 West 7th Avenue
Anchorage, Alaska 99513-7599

Dear Ms. Childs:

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These are my comments on BLM's Draft Amendment to the 1998 Northeast National Petroleum Reserve – Alaska Integrated Activity Plan/Environmental Impact Statement (IAP/EIS).

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I very strongly support the “no action” alternative, Alternative A.

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In fact, the more I research this issue, the more outraged I become at BLM's proposed “preferred” action, which seeks to overturn what I consider to be a reasonable compromise between environmental protection on one hand and energy development on the other. The 1998 Northeast IAP/EIS represents a balance that allows oil development while protecting critical wildlife habitat and subsistence culture of the Inupiat people.

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NEPA
Process

I have read many of the public comments from last Fall's Anchorage, Nuiqsut, and Barrow scoping meetings. I found particularly compelling those comments from Geoff Carroll, Alaska Fish and Game area biologist, George Ahmagoak, North Slope Borough Mayor, Mary Hicks, and John Schoen, Audubon Alaska scientist. These and all other public comments, except those of resource development organizations or companies having a financial interest in the outcome, have been virtually ignored in your draft preferred alternative.

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Good public policy decisions can only come about in a process based on sound information, objective analysis, and meaningful participation of all stakeholders. That is what happened with Secretary Babbitt's 1998 Northeast IAP/EIS. That is not what is happening now.

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Purpose

Clearly, what BLM has orchestrated here, despite what you profess, is not an analysis based on sound science and meaningful public process. It is a predetermined policy decision driven by industry, through its undue influence on the Energy Task Force, and by the ideology of the Bush/Cheney administration. This administration doesn't believe in sound science and public process; it believes in twisting science and ignoring the public in order to meet its own policy objectives. The track record is indisputable, and this amendment process is another egregious example.

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Basic

Please, name for me one credible scientific study since 1998 that discounts the vital importance of Teshekpuk Lake Special Area to migratory bird nesting, rearing, molting, pre-migration staging. Or one that discounts the importance of this Special Area to the Teshekpuk caribou. I don't believe you can.

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Research

The provisions and stipulations of the 1998 document are absolutely necessary in order to protect critical wildlife habitat and subsistence culture. In removing the bulk of these requirements and in eliminating, in particular, the research and monitoring team, you are poised to do serious and permanent damage to a critical area.

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I urge BLM to view scientific evidence and the public process not as obstacles to overcome but as vehicles to guide policy decisions. If you do that, you will leave the 1998 plan in place; you will choose Alternative A.

Thank you for this opportunity to comment.

Sincerely,

John Strassenburgh