



CoastalPlain\_EIS, BLM\_AK &lt;blm\_ak\_coastalplain\_eis@blm.gov&gt;

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## [EXTERNAL] Comment on Coast Plain Oil and gas Development in Arctic Wildlife Refuge

1 message

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**Keith Arnold** <arnold.keith@gmail.com>  
To: blm\_ak\_coastalplain\_EIS@blm.gov

Fri, Apr 20, 2018 at 2:34 PM

Hello,  
Please see my attached letter submitted for public comment period opening 4/20/18 for the proposed oil and gas exploration in the Arctic Wildlife Refuge

Thank you for considering my comments, I have mailed a hard copy as well to be sure this arrives and is considered.



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**Letter to BLM Alaska - Arctic Wildlife Refuge.docx**  
27K

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Letter to BLM Alaska Concerning Public Comments for the Environmental Impact Statement of the Coastal Plain Oil and Gas Leasing

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

BLM Alaska State office & Reviewers of Public Comments for the Environmental Impact Statement of the Coastal Plain Oil and Gas Leasing,

Hello and thank you for considering my comments,

I am submitting my comments on the proposed exploration and conversion of the Arctic National Wildlife Refuge into a Natural Gas extraction site, so that they be considered when evaluating the EIS for this proposed extraction project. The area in which the proposed action will take place has been referred to as the 1002 area, a specific parcel within the lands identified Alaska National Interest Lands Conservation Act. I am strongly opposed to any Oil and Gas Exploration and extraction in this Wildlife Refuge. This refuge is key habitat and is just one more piece of key wildlife habitat, being considered to be converted into a petroleum extraction site. We cannot continue to recklessly use up our non-renewable energy resources and aggressively extract from sensitive wildlife refuges, before it is necessary. This is being done way to soon and maybe should never be done in this area. Humans are already extracting more than enough non-renewable sources of energy, we do not need this additional flow of oil and gas. What we do need is to continue and expand upon our protections for natural landscapes in which hundreds of thousands of wildlife and plant species depend. The purpose of a Wildlife Refuge is to preserve the wildlife populations habitat so that they may exist unimpeded by human interference and exploitation, for the sole purpose of preserving the natural ecosystem so that the plant and animal species may continue to exist and reproduce as they have been doing. This action will thus end the preservation of the land for Wildlife to exist and push forth an unnecessary extraction at the expense of the surrounding ecosystem. There are numerous documented reasons of how different aspects of this Oil and Gas Extraction project will negatively effect the wildlife and plant species for which this refuge exists, thus proving that this act cannot take place within a wildlife refuge, without the disregard for what a refuge is, and is meant to accomplish. Allowing this plan to go forward by leasing this wildlife refuge to be mined and converted into an oil extraction hub, will not only ruin the Arctic Wildlife Refuge, decreasing it's carrying capacity and ability to buffer against additional population declines and losses in genetics for endangered and threatened wildlife species, but It will undermine the concept of a Refuge worldwide, and further degrade the concept of a refuge meant for preservation of life outside of humans.

- This action undermines the principles of a Wildlife Refuge. Pushing this exploration through on a landscape that has been determined to be key wildlife habitat for endangered and threatened wildlife species, is reckless and shows a lack of understanding of the impacts of such oil explorations, and physical infrastructure that exploration requires.
  - o The proposed physical footprint of permanent infrastructure is not to exceed 2000 acres, but this does not account for the far greater footprint that roadways and pipelines may inhabit and impact.
  - o Noise pollution has been increasingly shown through current wildlife management plans to be of significant impact. Wildlife species for which the refuge was established will avoid the area inundated with industrial noise which will be far greater than the 2000 acre footprint in the middle of the refuges prime flat habitat, and thus degrade a significant function of the protected valley floor and riparian areas as wildlife habitat. The BLM itself manages massive amounts of

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lands that are impacted by industrial noise. This is the noise that oil drilling, extraction, construction of infrastructure and transportation produce. This noise contributes to wildlife behavior and negatively impacts the effected habitat's carrying capacity for the overwhelming majority of wildlife species which are currently covered in management plans. This is not a new concept to wildlife management. The BLM, Forest Service, and National Park wildlife management programs all asses Noise Pollution when calculating critical habitat for endangered and threatened wildlife species, such as Sage Grouse. Many animals have been shown to avoid areas near oil derricks or wells. The noise pollution of roadways and the construction of roadways is a significant impact on wildlife behavior, as has been shown in numerous studies conducted by Wildlife biologists both employed by BLM and Forest Service, and by Biologists working at academic institutions such as the Schools of Natural Resources at the University of Arizona, or University of California Berkeley.

- Roadways have also been shown to be a major contributor to wildlife mortality, behavior, and exposure to toxic substances.
  - Wildlife mortality is significantly impacted by roadways, it doesn't take much to show this to most people, as anyone who drives a car on a public roadway has probably seen a dead wildlife species on the side of the road, and more likely sees this on a regular basis. These animals are dead usually because collision with a vehicle. This should be of significant concern as there are expected to be very extreme driving conditions, with low visibility sometimes on frozen roads, and intense arctic weather fluctuations, which increase the likelihood of a collision with wildlife. The nature of trucking equipment and oil, in and out of this refuge will likely entail a steady flow of vehicles at all hours of the day, which can be extrapolated to a mortality rate amongst populations expected to be crossing or nearby the road. Smaller animals have difficulty managing large roadways and can become stranded within the middle of the roadway. The lack of vertical structure in the habitat leaves animals exposed to the elements and predation. Soil compaction caused by the roadway also greatly effects subterranean wildlife and soil health, and can be a cause or contributor to soil erosion, both incrementally over time and as catastrophic erosion events due to extreme weather. Extreme weather is commonplace on the coastline of the Northern Sea. Massive erosion events can adversely effect wildlife habitat by disrupting migratory movements, such as with large migratory ungulates like the caribou who have lived in, and utilized the area now known as the Arctic Wildlife Refuge for the species known occupancy of this world.
  - The Caribou and other wildlife species have just as much of a right to exist in their natural environment as we do. Drilling for more oil wells and shipping it across the globe is not necessary to human existence. It is merely a way for the companies in a position to exploit this area's resources to increase their output of gasoline and other petroleum products like plastics and tar. By increasing their output they will have short term financial payouts, which will reflect in an increase in tax revenue. This however disregards the fact that the area being explored is a wildlife refuge and will cease to be a refuge as soon as it becomes an oil field, with roadways and pipelines cutting across its landscape, disrupting and damaging the wildlife within the refuge. This will adversely impact the wildlife's ability to exist in their natural environments, while doing nothing to enhance human's ability to exist in our natural environments. As humans decide to degrade more and more natural places the carrying capacity for Wildlife and plant species drops, and sometimes collapses.

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- Oil and Gas Extraction is a significant contributor to toxic waste proliferation in the local environment from which it was extracted. This is not new information but well established fact, which the EPA has regulated since it's inception. Oil Derricks and wells along with filling stations and gas stations are all routinely checked in on by EPA officials to document and attempt to prevent toxic waste inundation into the soil and surrounding environment. The roadways themselves, which are heavily used in the transport of machinery and the extracted oil, are major sources of toxic waste exposure, as chemicals leak out of the trucks and machinery and there is high likelihood of more catastrophic failures like spills and leaks. Studies conducted by Biologists across the country have shown that petroleum based chemicals can adversely effect wildlife behavior and fitness. Many chemicals found to build up on roadways due to automotive toxic waste, are known endocrine disruptors and carcinogens. Wildlife eating plants and other animals who are exposed to the toxicity of the roadways can have decreased fitness, and altogether fail to reproduce and survive.

This move fundamentally undermines the survival chances for all species on earth, as it is an unnecessary extraction not based out of human necessity but out of lust for a valuable natural resource which can be converted into wealth and political influence. I will digress further on this chain of thought as it seems that these outcomes are not being weighed when determining the conservation decisions made for a non renewable resource on public lands protected as a wildlife refuge. Please keep in mind that the oil suspected to be within the Refuge was earmarked to be used only if the US Navy was in dire need of additional oil. This is not the case, the US Navy have enough energy sources to operate as it has been. This exploration is being pushed forward by a corrupted congress and administration, in order to secure a massive profit generator for a few business entities which will then reciprocate profits back to investors and shareholders who had the foresight to invest in the companies which are going to benefit from this. This will create revenue for the Oil companies that win the bid for the extraction lease, and for the investors who act quickly following the approval of this extraction plan. The reason for this is to create returns on investments in these companies so that a few people, likely the majority of the congress and members of the administration, can increase their wealth in the future. This entirely abandons the purpose of this site, The Artic National Wildlife Refuge, and replaces it with the purpose of creating a new investment opportunity for those who are aware of it's impending returns, i.e. the congressmen who snuck this into their Tax Cuts and Jobs Act of 2017. Keep in mind that this congress has been utilizing gerrymandering to maintain and increase the presence of like minded representatives, and is not actually representing the majority of American citizens, who will not benefit from this oil and gas exploration at all.

We have enough oil production currently in operation and can thus focus our efforts on creating a renewable energy infrastructure so that humans can continue to have electricity to help them live comfortably into the distant future, while reducing or maintaining their current impact on wildlife, plant, and other forms of life.

We need to use the oil we have available to make a shift towards creating and relying on energy source which utilize the physical parameters of natural world to create electric charge, to be either immediately used or stored for later use. Pushing to extract every possible molecule of the fossil fuels buried under the earths outer crust is short sighted and enables our energy infrastructure providers to postpone and delay development of renewable energy sources. There are sources of energy all around us, our world is not static, forces that have been identified long ago as forces that can be mechanically harnessed still exist and will continue to exist for millennia on Earth. Solar radiation, Sunlight, Is a potent source of energy which is a parameter of our natural world. Ocean currents, hydro energy, wind, atmospheric energy have been harnessed by humans for thousands of years. Biological production of potent energetic molecules such as ethanol, can help provide combustion based energy which our

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infrastructure relies on. With the massive strides forward in Energy Storage technology we are able to hold a charge in relative stability, similar to holding a tank of gas in your car, ready to utilize on demand.

The resource that is being focused on, fossil fuels, will run out, and if we have not utilized its incredible energy potential to create a greater form of energy production which does not run out, then humans will have to greatly adjust their lifestyles, i.e. no cars, no grocery stores stocked with food etc. A clean transition into a more sustainable lifestyle will be easier on the health of the planet and its inhabitants, as we have seen countless times before in history. When Humans are starved of resources, mainly food, mass extinctions follow, this has been shown to be the main driver in the loss of North American Megafauna such as the Mammoth, Bear Sloth, Giant Armadillo, and Steller's Sea Cow. Humans desperation for food and animal body parts has also led to the extinction of the Passenger Pidgeon, once the most abundant bird on earth, and is leading to the extinction of several primate species and other macro-fauna, such as the Mountain Gorilla, Tigers, Elephants and Rhinoceros, to name a few.

This is a digression from the main point of this letter, but I feel it is necessary to bring these human caused catastrophes to light, as this is the impending result of blowing through our oil and gas reserves before it is truly necessary. Once these run out they are gone and will not replenish themselves, converted into gaseous emissions and heat. Our world's massive human population currently will not be able to survive without the amenities such as food that are delivered to them through fossil fuel derived energy. If the food runs out environmental degradation will follow, and a massive species extinction will occur across the planet. Once animal species go extinct they are gone, and the ecosystem they are a piece of collapses and reforms as something new, something that may not function. This is called a cascade effect and can result in the extinction of entire ecosystems consisting of thousands of species. Looking into the future of our planet, it is an undeniable truth that we must preserve as many species and types of life that have arisen from Earth's evolutionary chain, not just the humans.

As we choose to degrade the concept of a Wildlife Refuge we open all future refuge and conservation lands up to immediate exploitation. The Refuges were established to keep habitat intact, so that the vast network of life within them can continue to exist and interact as it has been doing and evolving to do. This state has led to the stability of the world in which intelligent humans arose, where food and habitat for humans is so plentiful. This is not a guaranteed state and without the millions of contributing life forms, our network collapses and our world may not be so habitable to our form of life anymore, as we have made it uninhabitable to the majority of established life forms that we have coevolved with.

Is this short term increase in oil production for a private company or two worth degrading our concepts of conservation? This is a push to create a productive investment for a few people who may be able to get a stake in this operation, and then receive a payback exponentially higher than their investment. Savvy investors who use their wealth increases to influence our government officials in order to get infrastructure installed and refuges converted into oil fields, so that they may expand their wealth and influence further. The oil within the refuge was officially earmarked by President Warren G. Harding in 1923 when he ordered the area reserved as a source of oil for the U.S. Navy. The Wildlife Refuge was later established when it was determined that it was necessary for the survival of the Arctic ecosystem, as it is a biodiversity hotspot in the Arctic, Bolstering the surrounding landscape's wildlife and plant populations.

Do not allow this refuge to be converted into a Oil production site, The impacts of day to day operations at the extraction site and along the roadways and pipelines will be extremely detrimental to wildlife, and the possibility of a catastrophic event such as a spill could further degrade the purpose of this site as a Wildlife Refuge first and foremost. How is it that the sole purpose of this site is being overlooked?

Our government is being run by people who are not representing the people of the country or the best interests of life on this planet, they are simply taking advantage of a house and senate majority and an abhorrent and corrupt

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administration in order to secure a lease as quickly as possible on lands that should never be extracted from. They are pushing this through now because they know that they will likely not have the opportunity in the future, because this action is fundamentally wrong and unnecessary, and that a government concerned with the survival of biodiversity, would never undermine its refuges in order to secure an extraction deal with a private company for the purpose of enriching them and their investors. This is an abandon of our principles as land managers and is a leap backwards in the human realization that we are stewards of the Earth and members of the ecosystem, not entitled exploiters, separate from all other forms of life here to serve ourselves and generate wealth so that we may live unnecessarily lavish lives and corrupt our representatives decisions in order to further dominate and entrench footholds in the energy market.

I greatly appreciate your reading of my letter, and I hope that it factors in to the decisions being made about the use of our Arctic Wildlife Refuge. Please Do not corrupt our Artic Wildlife Refuge, that decision would be short-sighted. The Arctic Wildlife refuge is infinitely more valuable to the planet intact, undeveloped, than it is to the private oil companies hoping to turn it into their next temporary cash cow and destroy its true purpose as a refuge. The only possible reason to extract oil from here would be if we had run out of oil elsewhere from exiting sources, which we have not, in fact worldwide and nationwide oil production is at or near its highest levels in history.

Please consider my thoughts and know that they are shared by the majority of people on Earth who do not stand to benefit from the Oil extraction, but do benefit everyday from the preservation of our planets most valuable natural resource, life itself; the biodiversity that arose along with our own species, and can never be replicated once lost. If you pull enough pieces out of a mechanism it will no longer work. The pieces of a clock all contribute to that clock being able to function and keep time. We cannot abandon our already lax efforts to preserve biodiversity on this planet. Please do not convert the Arctic Wildlife Refuge into an oil extraction site. Every step down the wrong path is at least two more steps that we will have to take in order to get to where we should have been.

**Thank you,**

**Keith Arnold  
1201 Bollinger Canyon Road  
Moraga, CA 94556**

**4/20/2018**