



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] EIS Coastal Plain Oil and Gas Leasing Programs in the ANWR/Area10021 message

In The Shadow Of The Wolf <intheshadowofthewolf27@gmail.com>
To: blm_ak_coastalplain_EIS@blm.gov
Cc: mnhayes@blm.gov

Mon, Jun 18, 2018 at 2:03 PM

Nicole Hayes
Project Coordinator
Coastal Plain Oil and Gas Leasing Program EIS
[222 West 7th Avenue](#), Stop #13
Anchorage, Alaska 99513
mnhayes@blm.gov blm_ak_coastalplain_EIS@blm.gov

Dear Ms Hayes,

As a U.S. citizen deeply concerned for our environment and diminishing wildlife populations, I am writing to highlight for you the fundamental importance of fully protecting its 1.5-million acre coastal plain. Like the majority of Americans, I completely oppose oil exploration, development and production in the Arctic Refuge. Such activity would be incompatible with the purposes for which the refuge was established, including “to conserve fish and wildlife populations and habitats in their natural diversity.”

I would like to focus on polar bears with this commenting opportunity.

Polar bears are a major concern when considering of the harmful effects oil drilling. A [declining population](#) of polar bears reside in the Alaskan National Wildlife Refuge, and are one of only two subpopulations of polar bears in the United States. Known as the Southern Beaufort Sea population, approximately [900 individuals](#) remain (at last count), and are listed as [threatened wherever found](#).

This already declining population is facing a very real threat in the face of climate change and arctic oil drilling. Polar bears experienced a 40 percent population loss between 2001-2010 from 1,500 to 900 bears during a period of sea ice decline (Jeffery F. Bromaghin, et al., Polar bear population dynamics, Ecological Applications).

One fundamental issue in planning for ANWR oil development is choosing the most appropriate time of year to enter the Refuge for drilling. In an attempt to minimize their environmental impacts, several oil companies proposed limiting their activity in the Refuge to winter thus reducing the harm to the majority of species in the area. This plan, of course, would be severely detrimental to polar bears, as winter is when polar bear denning occurs (Corn, 2003, p. 62), making them particularly sensitive to disturbances. Every October/November, female bears move onshore, to coastal areas, where they then dig a den in November, and give birth to one to three cubs in December or January. The mother and her new cubs do not emerge from their den until March or April (U.S. Fish and Wildlife Service, 2017, para. 3). The ANWR possesses the highest density of onshore dens of any area (approximately 43%) along the Alaskan coastline (Corn, 2003, p. 61), making it, by far, **America’s most important onshore denning habitat** for polar bears. One reason for this may be that the Refuge coastal plain and northern foothills have more uneven terrain than areas to the west, allowing snow drifts to form more readily (U.S. Fish and Wildlife Service, 2017).

With a large number of denning individuals in the area, threats from drilling could have significant impacts on the Refuge's bear population.

Several studies found that female polar bears are highly sensitive to even slight human disturbance and will often respond by abandoning their cubs (Corn, 2003, p. 61). Aside from the drilling itself, other oil-related processes, such as seismic blasts, drive mother bears away from their cubs. In 1985, a pregnant polar bear in the Refuge was observed abandoning her soon-to-be birthing den after she was disturbed by seismic activity from what was considered to be the most intensive monitoring program ever in place for seismic exploration (Garner, G.W. and P.E. Reynolds. 1986. Arctic National Wildlife Refuge coastal plain resource assessment: final report, baseline study of the fish, wildlife, and their habitats. Section 1002c, ANILCA. U.S. Fish & Wildlife Service, Anchorage, p. 158.) – evidence that these bears would be highly responsive to even the most state-of-the-art ANWR drilling program.

As polar bear denning occurs both on mainland areas *and* on annual ice plains, polar bears' denning behaviors will be heavily affected no matter where the drilling occurs, be it on the mainland or offshore, as any potential den displacement cannot simply be shifted outwards onto offshore ice islands, banks, and plains where drilling is not present. It is imperative to recognize the significant reduction in Arctic sea ice over the past few decades, thus reducing alternative denning areas. The decline of sea ice is a trend that is only expected to continue and potentially worsen. **September Arctic sea ice is now declining at a rate of 13.2 percent per decade** (NASA, Arctic Sea Ice Minimum, [Scientific Visualization](#)).

To further exacerbate this dreadful situation, a strikingly large proportion of the Southern Beaufort Sea polar bear population (nearly half) choose to make their dens on annual pack ice that has been declining since 1990 (Durner, Amstrup & Ambrosius, 2006, p. 35 also Bromaghin JF et al., Polar bear population dynamics in the southern Beaufort Sea during a period of sea ice decline - [link](#)). However, as the sea ice melts, the polar bears are forced to seek out another area for denning purposes. It seems inevitable that the proportion of bears denning on the mainland in the Refuge will increase dramatically within the foreseeable future, a phenomenon that only further heightens the value of the Refuge for U.S. polar bears.

Polar bears in arctic regions use sea ice not only for denning habitat but for crucial hunting grounds of their main prey species: seals. Because of melting sea ice, it is likely that many polar bears will starve. A new study reveals that large carnivores need to eat 60 percent more than anyone had realized. The study also reveals polar bears' utter dependence on seals (Anthony Pagano, USGS, Polar Bear Ecology and Conservation) – [link](#).

The continuing decline of arctic sea ice, and reduced ability to capture a key food source, intensifies the many threats polar bears across the arctic, including the declining Beaufort Sea population, are facing. Arctic populations have declined in numbers by approximately 40 percent since the start of the millennium. In 2007, the U.S. Geological Survey estimated that the total number of polar bears worldwide will shrink to just a third of its current size due to loss of habitat and decreased access to prey ([link](#)). In fact, some scientists believe that polar bears and other iconic animals could be extinct by the end of the century, emphasizing the need to protect critical habitat and marine areas, a primary tool for mitigating threats to marine biodiversity ([link](#)).

As polar bears are one of the most highly susceptible species to human-induced climate change, these magnificent creatures are already fighting a brutal uphill battle against prominent changes in fundamental habitat structure – a sad reality that is only forecasted to intensify. Further, the results from a study based in the 1002 Area of the Refuge suggest that climate change and oil development behave synergistically when their future potential impacts on wildlife habitat are analyzed in unison (Fuller, Morton, and Sarkar, 2008). In other words, the simultaneous occurrence of climate change and oil development would intensify both of their individual contributions to habitat reduction for polar bears, (in addition to ten other resident species). Fuller, Morton, and Sarkar (2008) conclude that shortfall from wildlife conservation targets in the 1002 Area is up to 35 times greater if the area is developed for oil drilling as opposed to being left intact, and affirm that their findings should provide Congress with critical

insight for **permanently proscribing oil development and designating it a protected wilderness area** (p. 1556, [link](#)).

The Arctic is one of our last and greatest unspoiled wild places. No oil company has ever successfully drilled for oil in the pristine, wildlife-filled public waters of the Arctic Ocean despite an expensive and near catastrophic attempt by Shell Oil to explore for oil there in 2012, when a Shell drilling rig ran aground in a storm. Drilling here would threaten one of our planet's most fragile, and remote ecosystems.

Once again, like the majority of Americans, I completely oppose oil exploration, development and production in the Arctic Refuge.

Don't let the sun go down on the polar bears and other wildlife dependent on an intact ecosystem in Area 1002.

Thank you for your time and consideration of my comment, on behalf of the 30,000 members of In the Shadow of the Wolf community,

E. A. Allen
Executive Director
In the Shadow of the Wolf