



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] Comment from Arctic Audubon

1 message

gail mayo <mayogail@gmail.com>
To: Blm_ak_coastalplain_EIS@blm.gov

Tue, Jun 19, 2018 at 6:04 PM

Arctic Audubon Society

PO Box 82098
Fairbanks, AK 99708
arcticaudubon@gmail.com

June 19, 2018

Nicole Hayes
Attn: Coastal Plain Oil and Gas Leasing Program EIS
222 West 7th Ave., Stop #13
Anchorage, Alaska 99513
[Blm_ak_coastalplain_EIS @blm.gov](mailto:Blm_ak_coastalplain_EIS@blm.gov)

Dear Ms. Hayes,

Arctic Audubon comments on the proposed oil and gas exploration and development in the Arctic National Wildlife Refuge in response to your scoping Notice of Intent to Prepare an Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program(83 Fed. Reg. 17562 (Apr. 20, 2018).

Arctic Audubon is the most northern Chapter of the National Audubon Society. Our area covers Alaska north of the Alaska Mountain Range to the Beaufort Sea. Our chapter has about 200 members, and although many of us live in Fairbanks, we are represented throughout our area. We are all volunteers, so our chapter speaks with our own voices, as do all Audubon chapters. Many of our members testified at the Fairbanks public hearing on the proposed EIS, while others did not get a chance to speak when the hearing cut off at 9 pm.

The Arctic National Wildlife Refuge has been “our” refuge since we organized as a chapter in 1979. Our membership has supported the Arctic National Wildlife Refuge from its inception in 1960 as the Arctic National Wildlife Range to the creation of the “Refuge” in 1980 and on to the present day.

Since we live in Fairbanks, Alaska, where the headquarters for the Arctic National Wildlife Refuge is located, we have close association with the scientists, administrators, managers, and philosophers who shepherded the area from Range to Refuge . Many of our members have visited the Refuge; many have not but nonetheless embrace its values. Our members have walked, skied, climbed, camped, hiked, backpacked, rafted, kayaked, studied, and walked the refuge including its coastal plain. Some make their living guiding on the Refuge, some are in management positions, and some live subsistence lifestyles on the Refuge. We have contributed to previous conservation management plans developed for the Refuge by the U.S. Fish and Wildlife Service through their many stages and revisions.

Since 1986, Arctic Audubon has formally “adopted” the Arctic National Wildlife Refuge as part of the National Audubon Society’s “Adopt-a-Refuge” program, reflecting the special interest of chapter members

in the Arctic Refuge and committing us to active service toward wise and benevolent stewardship for the refuge. At that time, the Interior Department was poised to recommend oil and gas development—not wilderness designation—for the refuge coastal plain “1002 Area,” and our organization and its members engaged extensively in the process.

In 1987, Arctic Audubon provided public comment on the “1002 report” Legislative EIS as to its major deficiencies, particularly that the conclusions and Interior Secretary’s recommendation to lease the coastal plain were not supported by the scientific analysis and report itself which predicted major negative impacts would likely occur to the Porcupine caribou herd, muskox, snow geese as well as a major adverse impact on subsistence in the region. (DOI, 1987, Arctic National Wildlife Refuge, Alaska Coastal Plain Resource Assessment, Report and recommendation to the Congress of the US and final Legislative Environmental Impact Statement – Appendix – Public Comments and Responses, pp.O-168 to O-1982)

Back then, the public process was rushed, like the process now, and hearings inconveniently held the first week of January and then only in Anchorage and Kaktovik, so our members had to fly to participate. We found the EIS profoundly flawed due to preconceptions and bias, confusing and contradictory presentation of evidence, including the geological potential, incomplete coverage of the context of cumulative impacts on fish and wildlife and their habitats across the North Slope and nearshore (state) and offshore (federal OCS) Beaufort Sea waters, and that it omitted analysis of environmental impacts of the Prudhoe Bay development on air and water quality.

Arctic Audubon disagreed with the Interior Department’s leasing alternative, and we said that “the Arctic Refuge is best managed under Alternative E, with wilderness designation. This is the best way to permanently protect the refuge in a manner consistent with the purposes for which it was established, the conservation of unique wildlife and wilderness values.... Only true wilderness status is grand enough for this remaining area of untouched Arctic coastal plain. And only this choice is wise enough to protect this land in the name of current and future national interest.” Our comments on the 30-year old “1002 Report” LEIS are apropos today given that it is the latest EIS on oil and gas leasing and development in the refuge.

We were dismayed by the rushed insertion of the Arctic Refuge oil and gas provisions as a rider on the Tax bill without a single hearing. First, its devious inclusion in a tax bill abrogates the national attention and meaningful discussion and review that must precede such a decision. Second, the rationale of the proposal is faulty: the amount of oil available is not known, and its stated value is overinflated. Finally the possible impact of proceeding with the proposal is brushed off as insignificant, citing that only about 2000 acres would be affected when it is vague and confusing about what activities or infrastructure would be included and misleading in that each lease sale is to offer a minimum of 400,000 acres and the oil and gas program deals with the entire 1.6 million acre Coastal Plain area; that disruption of the caribou herd would be minimal, and the effects of an inevitable accidental spill would be negligible, even though ample scientific evidence shows the contrary.

The coastal plain of the Arctic National Wildlife Refuge is the most fragile northern edge of the United States and a place of unsurpassed beauty and biological productivity in our northern summers. The refuge coastal plain is coursed by a dozen major rivers flowing from the highest Brooks Range peaks down to hilly coastal plain, riparian habitats, lakes, ponds and rich wetlands, springs, river deltas, lagoons, barrier islands and shorelines along nearshore waters and bays of the Beaufort Sea. The compactness and diversity of bird habitats in the narrow Coastal Plain are important to migratory birds for nesting, feeding, staging, molting, and resting.

More than 200 species of birds migrate through six continents and all 50 states to breed in the Refuge. Over 70 species nest in the Coastal Plain. This is an important bird nursery.

Despite the cold conditions, 26 hardy bird species remain within the entire Arctic Refuge in significant numbers all year round, Frank Keim who is an Arctic Audubon member noted in his essay "Wings over Winter Snow," (in the book *Arctic Wings: Birds of the Arctic National Wildlife Refuge*). Of these, only a half dozen species or so are considered permanent residents of the Coastal Plain: Common Raven, Rock and Willow Ptarmigan, Snowy Owl, Gyrfalcon, and American Dipper, with Common and Hoary Redpoll occasionally seen and Ivory and Ross's Gull seen rarely.

The American Dipper resides in the warm open waters of Sadlerochit Spring on the Coastal Plain year-round. At Arctic Audubon's monthly meeting in November 2017, presenter Dr. Ed Murphy said, "The Dipper has the greatest ability to thrive in the harshest winter conditions." The Dipper's habitats in springs are uniquely vulnerable to the effects of water withdrawals and changes in hydrological flows; places with aufeis, river taliks, and a variety of other contributions of water vital to bird habitats have had little ecological study in the refuge, especially in the changing climate. There has been little scientific research on the wintering birds of the Coastal Plain. Traditional knowledge of birds, including wintering birds is important.

The Coastal Plain is a vital bird nursery is threatened by the combined habitat loss, human disturbance, increased predation, and risks of spills. There would be cumulative, permanent losses of its intact, diverse habitats from myriad oil and gas activities and infrastructure that would occur on the coastal plain as a result of the oil and gas leasing program and all subsequent phases of operations set in motion from geophysical and geological studies, science and monitoring studies, pre and post seismic, exploration, drilling, development, production, access roads and pipelines, ports, and dismantling, rehabilitation and restoration.

Audubon Alaska's report, *Birds and Oil Development in the Arctic Refuge*, describes cumulative consequences of oil and gas activities in the Coastal Plain,

"Over time, fewer birds would nest or stop in the refuge, and species with small, declining or vulnerable populations would be at risk. In the event that an oil spill were to reach coastal lagoons, the threat to bird populations would increase dramatically. The loss of bird life that would follow oil development in the Arctic Refuge would diminish its value to everyone, including subsistence and sport hunters, backyard birdwatchers, scientists, and outdoor enthusiasts around the world."

The refuge is also a place of solitude in the winter. The coastal plain can be unbelievably brutal, especially for humans and their machines, in terms of weather and remoteness. It is extremely arrogant of the oil industry and its political supporters to assume that this unique environment would emerge unharmed from oil extraction there. Industry claims that they can respond to "accidents" yet there continue to be chronic spills on average every day on Alaska's North Slope, blowouts, and risks of spills that could devastate migratory birds and other wildlife. Oil spills in the lagoons and open waters off the Refuge coast, as well as from oil and gas exploration and development in the Beaufort Sea (state and federal OCS waters) as well as shipping, barge traffic and other sources risk major long-term effects.

In conclusion, Audubon has reaffirmed its commitment to stand with the Gwich'in to defend the Arctic Refuge from oil and gas and uphold the wildlife, wilderness, recreational and cultural values it was established to protect. Arctic Audubon has always opposed oil and gas and other mineral exploration and extraction in any part of "our" Arctic National Wildlife Refuge since, above all, it is a "Wildlife Refuge." We will continue to do so. We hope you will give our concerns full consideration and offer a true no action alternative.

Sincerely,

Gail Mayo

Conservation Chair

2 attachments



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