



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

**[EXTERNAL] I oppose drilling in the 1002 area**

1 message

**Jay Anderson** <jayanderson@comcast.net>  
 To: blm\_ak\_coastalplain\_EIS@blm.gov

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Comments from:

Jay Anderson  
 22384 Riverside Drive  
 Cupertino, CA 95014  
[jayanderson@comcast.net](mailto:jayanderson@comcast.net)

Here are my comments on ANWR Coastal Plain Oil and Gas Leasing EIS.

I have visited the Refuge twice for 10-day backpack trips on the Achilik and Jago rivers. I just returned from my second trip there last week. My immersion in this area has given me a deep appreciation for its cultural and natural significance. This is the largest unspoiled wilderness in the United States. It is an area that is important to the entire world due to the migratory birds that use the refuge and particularly the coastal plain. It is the calving ground for the Porcupine Caribou which have the longest migration of any mammals on earth. And, it the cultural and spiritual home of the Gwich'in people who have lived there for centuries and rely on it for food. The area is rich with wildlife. I have seen Grizzlies, Wolves, Caribou, Dall Sheep, Muskox, and migratory birds. The arctic looks harsh and rugged, but it is a very fragile ecosystem. Permafrost lies just under the soils and any disturbance leads to damage that can never be un-done.

I strongly oppose any efforts to open the coastal plain in the Refuge to oil and gas exploration. This is completely unnecessary and will harm the area forever.

Issues that the EIS must address are:

1. Indigenous people's reliance on this land for food security. The Gwich'in people rely on the Porcupine Caribou herd for food, shelter, and clothing as they have for centuries. The caribou migrate to the lands encompassed in the 1002 area to give birth and nurture their calves. They are sensitive to human activity. Altering their migration will impact the viability of the indigenous populations. This is a human rights issue.

The DEIS must address impacts on food security, subsistence rights and subsistence food availability, and resulting cultural effects on the Gwich'in and Inupiat people, and explain how these impacts will be mitigated or avoided.

2. This is an international and transboundary issue. The DEIS must address how drilling would impact the United States' 1987 agreements with Canada to protect the Porcupine Caribou herd. The DEIS must address how drilling would impact the Migratory Bird International Treaty which is now 100 years old. Bird populations are declining around the world and drilling will affect important breeding and feeding grounds for many species that migrate from all over the world. The DEIS must address the impact on polar bears who are using the land areas along the coastal plain more due to decreasing pack ice.

3. Oil and Gas development is not consistent with the purpose of the Refuge. The Arctic Refuge was established specifically to preserve unique wildlife, wilderness, and recreational values. Specifically:

- (1) To conserve fish and wildlife populations and habitats in their natural diversity including the Porcupine Caribou herd, polar bears, grizzly bears, muskox, Dall sheep, wolves, wolverines and other rare and iconic animals. Clearly, human activity will damage these interests.
- (2) To fulfill international treaty obligations of the United States with respect to fish and wildlife and their habitats.
- (3) To continue subsistence use by indigenous people
- (4) To preserve water quality

The tax bill added a 5th purpose - an oil and gas program. This is entirely incompatible with the original specified reasons for the establishment of the refuge. The DEIS must address how this new addition will impact the original 4 specific purposes.

4. Adherence to other Federal Laws. The DEIS must address how drilling would violate or adhere to the stipulations and requirements of relevant federal laws such as ANILCA, the Natl. Wildlife Refuge Administration Act, the Endangered

Species Act, the Wilderness Act, the Clean Water Act, the Clean Air Act, and numerous international treaties.

5. Wilderness. Preserving wilderness values (not exclusive to designated wilderness areas) is one of the original purposes of the Arctic Refuge. Drilling and all the related human activity and development will irrevocably destroy the wilderness character of the coastal plain and the view shed of the designated Wilderness areas within the Refuge. The fragile tundra environment and permafrost cannot support development of roads, pads, airstrips, housing and other infrastructure. There is objective data in the still-damaged area where one drilling operation occurred. The coastal plain is the "heart" of the refuge and any impact there spreads throughout the refuge, the designated wilderness, and in the case of migratory birds, the entire world. The DEIS must address these far reaching impacts. There is no such thing as localized impacts in this ecosystem.

6. Wildlife. Preserving unique wildlife was another founding purpose of the refuge. There is very specific verbiage citing preservation of fish and wildlife populations, the Porcupine caribou herd, polar bears, grizzly bears, and numerous other important and iconic species. The DEIS must address these far-reaching impacts. Damage to the coastal plain will clearly alter the behavior and migration patterns of these animals and those impacts will ripple through the entire ecosystem.

7. Climate change. Impacts in the Arctic have a non-linear affect on climate change. Melting permafrost releases large amounts of greenhouse gases. This positive feedback loop will accelerate warming and impacts worldwide, but particularly in the fragile arctic environment. The DEIS must address these far-reaching consequences of human activity on the coastal plain.

8. 2000 acre surface development limit. This may sound like a limited scope, but these impacts will be spread across large areas and have far reaching impacts. The DEIS must examine how numerous local impacts will cascade and how those impacts will impact the entire ecosystem.

I do not believe that there is any way that these impacts can be mitigated in this incredibly fragile environment. The only way to preserve the environmental, cultural, and health benefits of the Arctic Refuge is to prevent any development activity on the coastal plain. Please do not bow to political pressure and short-term financial interests when analyzing this situation. We must preserve this last, great wilderness for future generations and for the health of the planet.

Sincerely,  
Jay Anderson