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[EXTERNAL] comment on Notice of Intent1 message

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This comment is submitted to BLM's "Notice of Intent to Prepare an Environmental Impact Statement for the Coastal Plain Oil and Gas Leasing Program, Alaska", issued 4/20/18.

I am deeply opposed to any oil and gas leasing and development activity in the Coastal Plain of the Arctic National Wildlife Refuge (the area commonly known as the "1002 Area"). I would like to share with you a few of the many reasons for my opposition, which is based on 25 years of personal experience on the ground in the Coastal Plain and adjacent northern foothills of the Arctic Refuge, as well as on a great deal of reading and research I have personally conducted as a lay person.

My opposition specifically includes exploration activities using seismic imaging, which I understand is tentatively slated to begin as early as December of this year. The most urgent message I can deliver in this comment is that this seismic imaging activity must be fully vetted through the EIS process before any such exploratory action is begun.

Seismic imaging is often portrayed as a benign activity -- taking place on snow-covered frozen ground in the winter. However, I can attest through personal observation that the effects of such activity are profound and long-lasting on the integrity and viability of the sensitive tundra of the Coastal Plain. In 1996, at the conclusion of a backpack trip from Peters Lake north to Camden Bay, I flew over an area between Marsh Creek and the Sadlerochit River that had been subjected to seismic testing more than a decade earlier. Even from more than a thousand feet in the air, the parallel scars in the tundra, miles long, were still startlingly visible. Even when the seismic testing is performed on frozen snow-covered ground, the underlying tundra is compacted and scarred for decades. And what is even more alarming is that the seismic imaging equipment used today is much more intensive than what was used back in the 1980's.

The sensitivity of the tundra to mechanical disturbance cannot be overestimated. On that same trip down Marsh Creek in 1996, I also observed scars of vehicle tracks along Marsh Creek within the last 10 miles or so of the shoreline. Inquiring about this later, I was amazed to learn that these tracks were from forty years earlier, during the construction of the DEW Line site at Camden Bay, when a couple of GI's took a single joy ride one day, up Marsh Creek in their half-track vehicle.

Another point that needs to be carefully vetted in the EIS is the politically-motivated false claims regarding the small "footprint" of proposed development in the Coastal Plain. It has been frequently claimed that the oil development footprint will be only a small number of acres, but these acreage claims cover only the drilling infrastructure, not the extensive network of roads and pipelines that will be necessary to construct, operate, and maintain the drilling platforms. These "footprint" claims are as specious as it would be for me to claim that the "footprint" of my waffle-soled hiking boots is limited to only the points of the waffle pattern that touch the ground, when in fact my footprint is obviously my whole foot, for heaven's sake! In addition, the "footprint" argument also ignores the impact of dredging massive quantities of gravel from nearby rivers in order to build the drilling platforms. I can relate another personal observation related to the decades-long impact of gravel dredging. In 2005, I flew in to an old DEW Line gravel airstrip at

Nuvagapak Point on the coast, a few miles west of the Aichilik River delta. A couple of miles away, at the mouth of the Kogotpak River, I observed large mountains of gravel, left over from the construction of the airstrip fifty years earlier, as well as the prominent scar of the road that was used to transport the gravel to the airstrip site.

All three of the scarred areas described in the previous paragraphs are within the boundaries of the Coastal Plain (the 1002 Area). Fortunately, due to the protection this area has had since these activities, the scars have not grown in scope. But in the event exploration and drilling activity is commenced in the 1002 Area, such scars will be everywhere, even decades or even centuries after the last drop of oil is extracted.

Finally, the impact of both exploration and drilling on the wildlife of this area will be profound, especially on caribou and polar bears. The thriving Porcupine Caribou Herd calves right there, in the exact same area as is proposed for these development activities. I have personally observed these calving activities and the aggregations of the herd on the Coastal Plain many times. It is not only an awesome sight, but the migratory paths of this herd provide crucial sustenance to the Gwich'in Athabaskan native populations of the communities of Arctic Village, Venetie, and Fort Yukon, on the southern boundary of the Arctic Refuge. I have spent time in each of these villages and have heard first hand from the people who live there about the importance of the migrating caribou to their traditional subsistence livelihoods.

The impact of oil drilling activities on caribou is another source of repeated false and misleading claims from oil development proponents. They often cite the supposed success of the Central Arctic Caribou Herd in the vicinity of the Prudhoe Bay development. But this claim is highly misleading vis a vis its applicability to the potential impact on the Porcupine Herd in the Arctic Refuge. The Central Arctic Herd is much smaller than the Porcupine Herd and has a much larger calving area. The coastal plain is several times wider in the Central Herd's territory, from Prudhoe Bay west and south. In the Arctic Refuge, the extraordinarily rich habitat of the coastal plain is confined to a very narrow coastal plain, and the adjacent habitat of the foothills is not nearly rich enough to support the tens of thousands of calves born to the Porcupine Herd each June.

Therefore, the effect of exploration and development in this area would be profound on the mortality of the annual calving and the viability of the herd in the long term.

The polar bear population of the Coastal Plain area is growing substantially and expanding its seasonal extent due to the severe impact of global warming on Arctic sea ice. This increasingly vulnerable population would be especially severely impacted by seismic imaging activity during the winter months, as this is their denning season, during which they are highly susceptible to disturbance.

Thank you for recording and considering my comments.

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