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[EXTERNAL] Comments on Arctic Refuge Coastal Plain Oil and Gas Leasing Program

1 message

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Dear Planning Team:

In 1974, at the age of 19, I first visited Alaska and was lucky enough to spend a month in the Arctic National Wildlife Refuge (the Refuge). That visit changed my life, as it led to graduate studies at the University of Alaska Fairbanks, which included two full summers of biological field work on the Refuge's coastal plain. That, in turn, led to a 28-year career at the US Fish and Wildlife Service, where I worked on assessing and mitigating impacts of North Slope oil and gas development on wetlands and wildlife, endangered species conservation, and arctic climate change.

Looking back over my 30-year career, it is clear to me that we are a lot less smart than we think we are when it comes to predicting (or even measuring) the effect of human activity on the environment. Definitive answers often remain elusive, even after years of study. While I would not necessarily predict a wildlife disaster if the Refuge were to be opened to oil and gas development, I am certain that there will be change. Anyone who confidently predicts that "we will do it right" and leave the arctic environment unscathed is expressing irrational exuberance rather than scientifically-grounded analysis.

I am opposed to opening the 1002 Area of the Refuge to exploration and development primarily because of the permanent harm it will do the wilderness values of the area, and the affront to local people. While not "designated wilderness" this landscape is unique in the American arctic – where the entire sweep of the North Slope, from Brooks Range to Beaufort Sea coast lies before our eyes largely unaffected by human activity. The power of that landscape to inspire and restore the human spirit will be irretrievably diminished if we allow industrial development and would deny future generations the same access to life-changing experience that I had. Furthermore, the risks to caribou populations would be unjustly and disproportionately borne by the indigenous population, while the benefits accrue elsewhere. At a time when the world is awash in oil and urgently needs to reduce dependence on carbon-based fuels to avoid further aggravating climate change, opening the Refuge is a poor trade-off.

Nevertheless, Congress has decreed that lease sales shall occur in the coastal plain of the Arctic National Wildlife Refuge and amended the statutory purpose of the Refuge to "provide for an oil and gas program" on the coastal plain. The tax bill did not repeal the original Refuge purposes, however, or the requirement in Section 1002 of ANILCA that obligates the Secretary to "authorize exploratory activity within the coastal plain in a manner that **avoids significant adverse effects on the fish and wildlife and other resources**" (emphasis added). The Department has a legal obligation to protect wildlife and wilderness values to the maximum extent compatible with adherence to the provisions of the tax bill.

With that legal obligation in mind, I recommend that the environmental analysis include the following:

- A thorough evaluation of the **effectiveness** of the various lease sale stipulations, permit conditions, and required operating procedures that have been implemented on State lands and the National Petroleum Reserve – Alaska with the intent to minimize impact to wildlife. Given the importance of the Porcupine Caribou herd to subsistence users, particular attention should be paid to evaluating the effectiveness of measures taken to protect caribou populations. An unbiased and transparent analysis of past practices is needed in order to assess the likelihood that an oil and gas program can be operated in a manner that protects the wildlife resources for which the Arctic Refuge was created. Sources of uncertainty and risk should be stated plainly – if effectiveness is unknown, this should be stated. This is a difficult task, but critical to the evaluation of the proposition that an oil and gas exploration and development program can be undertaken without adverse effects to wildlife, and/or subsistence harvest activities. Our confidence, or lack thereof, that we can protect the biological resources of the Refuge should be based on fact, not wishful thinking.
- Identification of ecologically important portions of the coastal plain, by virtue of biological productivity and/or human use for subsistence and recreational activities. At minimum include the following: caribou calving and insect-relief habitat; coastal habitat important for polar bear denning and foraging; river delta wetlands important for breeding water birds and river delta alluvial zones important for migratory shorebirds; coastal lagoons important for molting and migrating water birds and anadromous fish; riverine corridors important for diverse vegetation communities, terrestrial mammals and freshwater fish.

- Assessment of the effectiveness of prohibitions on surface development in the ecologically important zones identified above as a means to protect wildlife, subsistence uses, and wilderness recreational values. This should be coupled with an assessment of the practicality of directional drilling from outside these zones to extract petroleum with minimal impact to other values and identification of the largest buffer zones that would provide maximum protection to surface resources while allowing exploitation of sub-surface resources.
- Identification of geographical characteristics that differ between the Arctic Refuge coastal plain and other portions of the North Slope, and acknowledgment of how these characteristics require different approaches than those taken in past developments. These include a narrow coastal plain with little alternative habitat for caribou displaced by human activity. There is also a scarcity of open water habitat (lakes and ponds) and wet/flooded sedge tundra (such as low low-center polygon fields) -- protecting these habitats from adverse modification will be necessary in order to preserve the diversity of wildlife within the Refuge. Freshwater supplies for ice roads are extremely limited and thus will require alternative methods of exploration. These points are important because they highlight areas where past practices and experience in arctic oil and gas development are not relevant guides to environmentally responsible development in the Refuge.
- Evaluate use of modern snow measurement and modeling techniques for the purpose of avoiding damage to tundra vegetation/permafrost, and avoiding polar bear denning habitat.
- Evaluate options for phased leasing and development, coupled with rigorous impact assessment, to guide the conduct of leasing and development. This adaptive management approach should be designed to be responsive to areas of uncertainty and risk identified in the analysis (see above) of the effectiveness of past mitigation measures and the uncertainties highlighted by the analysis of identified differences between the Refuge's environment and other North Slope locations.

Thank you for considering these comments. The proposed oil and gas lease sale in Arctic Refuge is ill-advised and harmful to the national interest, which lies mainly in preserving an intact arctic ecosystem rather than further oversupplying the global petroleum market. Nevertheless, your analysis may provide a clear picture of the expected impacts, risks and unknowns, and best options to reduce those impacts. I wish you well in this endeavor

Sincerely,

Philip Martin

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