



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] Public scoping comments Flash Cards on Arctic Refuge Coastal Plain Oil & Gas Program EIS1 message

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Cc: pammillerarctic@gmail.com

Wed, Jun 20, 2018 at 12:13 AM

Dear Nicole Hayes,

Please find my public comments,"Flash Cards".

These flesh out my oral public hearing remarks which were presented at the Anchorage and are provided as written comments.

Regards,

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PamelaAMiller Comments Flash Cards BLM ArcticNWR CPo-g leasingEIS 6-19-2018.pdf
386K

Arctic National Wildlife Refuge
Coastal Plain Oil and Gas Leasing Program EIS
BLM Public Hearing for Scoping
Dena'aina Center, Anchorage
May 30, 2018

Written Testimony Submitted on June 19, 2018

by

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Flash Cards

I am Pamela A Miller, I live in Fairbanks.

When I was 3, my Dad read to me... flash cards of North American mammals (shown one by one):

Muskox, wolf, tundra vole, collared lemming, porcupine, weasel, pika, walrus, beluga. The caribou card says, "shy but curious, eyesight fair, but hearing and sense of smell keen. Found in great herds, migrates, feet click at each step. Economic importance: In many areas of the North, humans need meat and hides of caribou to survive." Learning about Arctic animals from a loving parent was a seemingly small thing to a child. But here we are today.

These flash cards, while mere "Cliff" notes, have more information about the animals living in the Arctic Refuge Arctic Refuge than BLM has given us here today.

BLM is not ready to do scoping for this EIS and should start over. I oppose leasing and any oil and gas activities in the Arctic Refuge as it will irreversibly destroy the wholeness of this intact ecosystem.

Note: This is bit of testimony is roughly what I was able to give after the 9:00 pm hour when the testimony was to be cut off; anticipating my number was to be next in line, I spoke along with a line of others who still held numbered speaking cards. My remarks were extemporaneous and so differ from this written testimony.

The BLM's scoping information obscures the fact that we are talking about the animals that live in the Arctic National Wildlife Refuge and the Gwich'in people who need the caribou to survive, physically, culturally, spiritually. The agency denies that the Coastal Plain is still an integral part of the Arctic **National Wildlife Refuge**.

Look at the only display map we see today at this hearing– the isolated Coastal Plain as mapped per the Tax bill provisions– not even within its context of the whole Arctic National Wildlife Refuge whose lands have been protected for wildlife and wilderness for over 57 years. The

“Coastal Plain Oil and Gas Leasing Program EIS Public Scoping Comment Form,” passed out here or the post cards sent to residents do not even say **Arctic National Wildlife Refuge** Coastal Plain. The public notice for the scoping meetings in the Fairbanks Paper did not even mention that this area is within the Arctic National Wildlife Refuge.¹ This disembodied mapping and naming “Coastal Plain, like “ANWR” or “1002 area” fails to provide the general public with sufficient information to scope the impacts of its decisions that will irretrievably affect the Arctic National Wildlife Refuge’s living resources, the uniqueness of this whole ecosystem, the cultural and human rights of the indigenous peoples depending on this place, and its long-term value to all Americans and the world. Nor did BLM provide any information about the kinds of oil and gas activities, infrastructure, past and existing geographic scope of oil and gas leasing across the North Slope, or even any maps of the Prudhoe Bay oil field complex in state and federal lands and waters.

At 30 years old, I first saw the Arctic National Wildlife Refuge. I began my participation in field studies of tundra birds and habitats as a biologist for the U.S. Fish & Wildlife Service in 1982 on the Arctic Refuge Coastal Plain Resource Assessment baseline study program.¹

In winters as a seismic exploration monitor, I measured snow on wind brushed ridges, witnessed dozens of heavy vehicles - thumpers, bombers, D-9 Cats pulling cattrains during that one-time “1002” program- that crashed riparian willows, crushed Eriophorum sedge tussocks, disturbed a polar bear mother from a den.

This was my key turning point, witnessing seismic thumpers and bulldozers pulling the crew camps tear up the tundra with lasting harm, unavoidable harm. The entirety of the Arctic Refuge coastal plain is knitted together with incredible complexity and it was impossible to avoid damaging the habitat or disturbing animals because of their different and overlapping geography of land and water in both time and space.

The one-time seismic surveys in the Arctic Refuge resulted in long-term changes to natural habitat diversity, including changes in plant species composition and permafrost stability. Long-term monitoring by Jorgenson et al. 2010 found that “Recovery to pre-disturbance communities was not possible where trail subsidence occurred due to thawing of ground ice. Previous studies of disturbance from winter seismic vehicles in the Arctic predicted short-term and mostly aesthetic impacts, but we found that severe impacts to tundra vegetation persisted for two decades after disturbance under some conditions. ... Climate change is likely to make permafrost even more sensitive to seismic exploration activity in the future.”² Seismic surveys have gridded most the North Slope with 32,000 miles of trails made just from 1990 to 2001, according to the National Research Council.³ They wrote, “Networks of these trails now cover

¹ Fairbanks Daily News-Miner, May 21, 2018. BLM Public Notice for Scoping Meetings. P. B7. (also published May 14, 2018)

extensive areas and are readily visible from the air, degrading visual experiences of the North Slope.”⁴

From my ground-level view of the Arctic, it is clear that even oil’s earliest stages are profoundly incompatible with the heart of wilderness wildlife refuge and its adjacent coastal estuary, and the homelands of the Gwich’in and Inupiat people who depend on these areas for their cultural sustenance. Furthermore, the stages of seismic, exploratory drilling, development of permanent facilities for processing and transportation of oil to distant markets proceed for decades, overlapping in time.

Since then I have witnessed the steady expansion of exploration and development on land and offshore with its cumulative effects at a regional scale.

Environmental reviews for offshore and onshore development have underestimated the extent of seismic surveys, for example, the BLM’s plan for the Northeast National Petroleum Reserve-Alaska, including sensitive Teshekpuk Lake wetlands. Four times more 2-D line miles were surveyed than predicted- totaling 15,400 miles, while 3-D surveys covered 14x as many square miles as predicted.⁵

Here we are today.

The refuge coastal plain bursts with life in the summer as migratory wildlife converges on this biological heart of the refuge —Not only the Porcupine caribou herd, and millions of migratory birds representing more than 200 species that nest, feed, molt, and stage here. Arctic cisco, other anadromous, migrating fish. Migrating beluga, whales. Even Ptarmigan migrate from the Brooks Range to the coast in spring in flocks of thousands.

The Arctic Refuge is unique on Alaska’s North Slope due to its compressed diversity of Arctic and sub-Arctic habitats, where the Brooks Range swings close to the Beaufort Sea coast in the northeastern corner of Alaska. Beautiful rivers rush northward from the highest Brooks Range peaks and Sadlerochit Mountains through foothills and hilly coastal plain, braid across wetland tundra, lakes, and ponds to open as broad river deltas with intertidal flats, a chain of lagoon and barrier islands, and bays, spits, and Beaufort Sea shores.

The refuge’s remarkable natural diversity of Arctic ecosystems as a protected land scape, without leasing, exploration and development is a beacon of hope for the world in this time when climate change accelerates around us, all of us.

Even without oil and gas, a transformation of the landscape with climate change is taking place. Already all glaciers in the Arctic Refuge are shrinking; in the next 50 years research says most of its 400 glaciers will likely vanish. Glacial loss will affect river flows, estuaries, birds, and fish (Nolan et al 2011).

The Arctic Refuge demands updates of its own unique baseline ecological studies and environmental analysis because the existing environment with its large glacial fed rivers and few large lakes and ponds, compared with west of the Canning River. It is not the same as the Prudhoe Bay region, or the NPRA. These areas have many different features of the physical and living environment

This EIS must address the entire scope of the oil and gas program and its full direct, indirect and cumulative impact that will be propelled forward by oil and gas leasing. The impacts of pre- and post-leasing seismic, geological and geophysical studies, exploration, development, production, transportation including roads, pipeline and aircraft, ports and tankers including at Valdez.

I have run out of time during this short public comment period.

The Arctic National Wildlife Refuge is priceless and timeless.

¹ Alaska National Interest Lands Conservation Act, Sec. 1002 (c); 16 USC 3142.

² Janet C. Jorgenson, J.M. VerHoef, and M.T. Jorgenson. 2010. Long-term recovery patterns of arctic tundra after winter seismic exploration. *Ecological Applications*, 20(1): 205–221.

³ National Research Council. 2003. p.86.

⁴ National Research Council. 2003. Report in Brief http://books.nap.edu/html/north_slope/reportbrief.pdf.

⁵ BLM, 1998, Northeast NPRA IAP Final EIS; (Petroleum News 1997, 2001; Kornbrath 1997).