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[EXTERNAL] Public scoping comments 3 Minutes about Forever on Arctic Refuge Coastal Plain Oil & Gas Program EIS

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To: blm_ak_coastalplain_EIS@blm.gov

Dear Nicole Hayes,

Please find my public comments, My 3 minutes about Forever.

These flesh out my oral public hearing remarks which were presented at the Fairbanks hearing.

Regards,

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Arctic National Wildlife Refuge
Coastal Plain Oil and Gas Leasing Program EIS
BLM Public Hearing for Scoping
Carlson Center, Fairbanks
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Written Testimony Submitted on June 19, 2018
by

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My 3 minutes about Forever

Note: For each minute of oral testimony, only bits from a few paragraphs written below would fit; my speech differed from this written submission.

I am Pamela A Miller, I live in Fairbanks.

In just 3 minutes of life, I must speak about forever for the Arctic National Wildlife Refuge.

If I simply read the name of each species of migratory birds that lay eggs, hatch, and migrate from the refuge, it would take all my minutes and more.

The first 60 seconds... Count the heart beats of this special refuge, where the Coastal Plain has been an integral part of its fabric since being set aside before Statehood over 50 years ago as it is today, whole, wild and free. This is refuge for an intact, interconnected web of existence of which we are a part, a refuge with heart beats of the land alive with regard for Gwich'in, Inupiaq and others in relationship with the migrating animals and their habitats. The Refuge Coastal Plain is recommended for Permanent Wilderness Protection.

This remarkable natural diversity of Arctic ecosystems is a beacon of hope for the world in this time when climate change accelerates around us, all of us.

"No Action," is the place today, complete with full breadth of life forces, a tapestry of ecological relationships that is the natural and human environment.

There needs to be full, robust and comprehensive No Action alternative, including an integrated ecological baseline and interdisciplinary analysis of the impacts from oil and gas. Also into both existing natural and human environment and all impact analysis there must be robust range of climate change stressors and effects for the next 50 years based on rigorous scientific Greenhouse Gas Emissions scenarios.

But can there really be an honest no “No Action” alternative because Murkowski’s words in the Tax Bill state there “shall be 2 lease sales.”

I oppose any leasing program and any industrial operations in the Coastal Plain because of the irreversible and irretrievable harm to the Refuge’s essential purposes which are managed by FWS today.

There is no way to ensure its ecological values at a landscape scale remain intact and for our national commitment to its wilderness purpose –so visionary at its founding and still yet today–lives on.

Minute 2. Countless animals in relationship with clean air, water, land and each other in a narrow, living, breathing band of tundra carved by 12 major rivers from Brooks Range to Beaufort Sea coast. Canning River (and tributary Staines River), Tamayariak River, Katakturuk River, Marsh Creek, (Iqalugliurak) Carter Creek, Itkilyariak Creek, Sadlerochit River & Sadlerochit Spring, Last Creek, Arctic Creek, Kajutakpok Creek, Nataroarok Creek, Hulahula River, Okpilak River, Akutoktak River, Jago River, Okpirourak Creek, Okerokovik River, Niguanak River, John River, Sikrelurak River, Angun River, Kogotpak River, Aichilik River.

All but a few stretches of these river channels freeze solid in winter, as do most of the lakes and ponds which significantly less than west of the Canning and in the heart of the existing Prudhoe Bay oil fields. There simply is not enough winter water for ice roads, drilling or industrial use without major harm to the natural populations and habitats in their natural diversity, for the Dolly Varden and grayling, sculpin upon which the birds feed, natural hydrological flow for wetlands that support the migratory birds and the clean water for the plankton, invertebrates and full diversity of life in the refuge.

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 permafrost in the refuge coastal plain is extremely ice rich with massive ice wedges - especially along the shore line, an area vulnerable to melting and erosion from climate change along with greater risks for the structural integrity of pipelines, especially at shoreline landfalls. The Arctic Refuge demands its own unique environmental analysis because the existing environment with its large glacial fed rivers and few large lakes and ponds, and many other living and physical features differ compared with west of the Canning River. It is not the same as the Prudhoe Bay region, or the National Petroleum Reserve-Alaska. You cannot simply superimpose practices from those places to the Coastal Plain, its apples and oranges.

On the Refuge over 200 fish and wildlife species have been documented for its Coastal Plain including 158 species of migratory birds of which 79 species are known to nest -- how many minutes to even read each species name? 47 mammals in the refuge or its adjacent waters

(although there are few current and long-term integrated ecological (western scientific) studies for most mammal species' trends in abundance, distribution and habitat use, relationships with other animals as predator or prey and interactions with plants and vegetation types; this is especially the case for small mammals like voles, ground squirrels, species in the weasel family and most furbearers.... 42 fish species, freshwater Arctic grayling, Arctic char, sticklebacks, sculpins; anadromous least and Arctic cisco, broad and humpback whitefish, Dolly Varden; marine species from Arctic cod, Pacific herring, capelin, sculpin, flounders, and many, many more.

The last minute. We face a crazy bill snuck through on the Tax bill and now an obscene political rush by Interior to transform the Arctic Refuge for ever with an EIS decision in one year. We are not talking about 2,000 acres of change, not even just 1.6 million acres of Coastal Plain change, this is wholesale transformation to industrial use of a region. In the place where I grew up, Cleveland, Ohio which was the long-time home of SOHIO, such transformation of the landscape from its original natural condition, took hundreds of years not mere decades like has occurred across Arctic Alaska.

This transformation of a huge region entails oil and gas impacts that will reach far beyond the direct footprint as the National Research Council cumulative impacts study concluded in 2003. The 2,000 acre "limitation" in the Tax bill –with whatever restrictions might be put in place assuming that a documentation system could be set up that is transparent and does not end up corrupt or failed like the notorious Enron Corporations' – is misleading at best given that the minimum size of 400,000 areas is mandated for two mandated by the bill and these areas could be fully committed to the exploration, development and production of oil and gas, and due to the fact that the Tax bill removed ANILCA Sec. 1003 prohibitions on leasing and development for the entire 1.6 million acre coastal plain.

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, scientific studies, exploration, development, production, transportation including roads, pipeline and aircraft, ports and tankers including at Valdez or elsewhere, and ultimately Dismantling, Rehabilitation and Restoration to "original conditions." The BLM's EIS cannot evaluate alternatives, including mitigation measures, stipulations, and potential impact levels without first doing a comprehensive and systematic study (social science and environmental, traditional knowledge and common sense) evaluating the actual practice of lease language, how they have been implemented in the office and on the ground, the adequacy of baseline environmental information to evaluate effectiveness, and exceptions, waivers, and violations of the stipulations, best management practices and violations of law and permit requirements. Based my reading of rent oil company applications, environmental assessments (if even that level of

NEPA analysis) and permit requirements, waivers very often have been requested and granted for fueling of airplanes on frozen lakes, despite the increased risks of spills and contamination with increased risk of harm to water quality and wildlife. See also *Broken Promises: The Reality of Big Oil in America's Arctic* (Pamela A Miller, 2012) in *Arctic Voices*, ed. S. Banerjee.

Some examples of the magnitude of industrial activities, and also how the talk about seasonal (timing) restrictions ignores the reality of year-round activities that the oil companies conduct today during all stages of oil and gas programs:

- 7,844 helicopter take-off and landings – Conoco Phillips plans in summer 2018 field season in the NPRA for environmental, mapping, geological and other studies. Of this, over 700 helicopter flights are for stickpicking – that's summertime trash clean up after exploration drilling, ice roads – and for summer staking ahead of the next winter.¹
- 256 million gallons of freshwater from 10 lakes for just 1 winter of Conoco Phillip's CP exploration in NPRA.
- 32,000 miles of seismic trails across the North Slope from 1990-2001 (NRC 2003)
- 197,000 miles Beaufort and Chukchi Seas (1968-2008)
- GHG emissions: >15 million metric tons CO2 equivalent from Alaska's oil and gas industry annually.
- The full scope of all activities, infrastructure, and stressors, and their direct, indirect and cumulative impact needs to be addressed including important areas that have never been addressed for the Arctic Refuge, such as effects on Gwich'in culture and human rights, combined effects of onshore and offshore development, global warming, water quality and quantity, air and water pollution, hazardous and solid wastes.

The goal of BLM's EIS process, to sell leases to oil company bidders, is to grant rights to extract oil which requires the gamut of oil and gas operations, activities, infrastructure and facilities that will negatively affect the existing Arctic Refuge human and natural environment. The leases are not mere "paper" exercise but invoke private rights to these public resources, lands and waters. This result is fundamentally wrong and irreconcilable with upholding the fundamental, original purposes of the Arctic National Wildlife Refuge to preserve the unique wilderness and wildlife, conservation of populations of fish, wildlife and their habitats in their natural diversity, adequate water quantity and quantity, subsistence, and upholding international treaty obligations. BLM must start over so that the public has adequate background context and factual information upon which to provide sufficient scoping comments.

Three minutes will never be long enough for the public, much less experts in the environment and in every other field, community members, and others interested to convey their concerns and expertise to the Interior Department.

We have a conversation in the time before, after, and during the public hearings among all of those who participate in this fundamental basis of democracy—the public meeting and hearing—as our right to petition the government. Listening to each other we learn from each other and this can help us all better understand the real issues at stake. In Fairbanks, all but one of 49 people who testified in the short, the actual public hearing session (not the pre-selected speakers) supported the values of the refuge as it is today and opposed oil and gas leasing and activities in the Arctic Refuge. About 30 or so more people had numbers and would have spoken; this line asked for an extension for the scoping period and for another hearing. We were not granted this. Without full hearing and comment from the people, the decisions are a mere black box, not democracy.

We are talking about the fate of OUR Arctic National Wildlife Refuge forever. Its living future should be timeless freedom, not oil.

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¹ {(June to Sept), This includes 465 flights for stick-picking (trash cleanup) for exploration ice roads, pads and 250 for exploration well siting, staking, and ice road scouting}.