



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] Attn: Coastal Plain Oil and Gas Leasing Program EIS

1 message

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To: blm_ak_coastalplain_EIS@blm.gov

Wed, May 30, 2018 at 11:13 AM

To Whom It May Concern:

I am writing to provide comments relative to the Arctic Coastal Plain Oil and Gas Leasing Program EIS.

I lived and worked as a wildlife biologist with US Fish and Wildlife Service for 28 years in Alaska. I was the Principal Investigator for 3 bird-related projects in the original baseline and follow up studies on the coastal plain for resource assessment of the Arctic National Wildlife Refuge for 3 of those years (1984-86 and 1988-89). My colleagues included caribou biologists Fran Mauer (USFWS) and Ken Whitten (Alaska Department of Fish and Game). My later work in the Division of Migratory Bird Management served to keep me informed about the status of this area.

The coastal plain portion of ANWR is approximately 1.5 million acres in size, and represents about 5% of the north slope coastal plain (north of the Brooks Range.) **The vast majority of the 95% not within the Refuge is already open for oil and gas exploration and development.** By giving this relatively small area Wilderness status we could permanently protect a complete arctic ecosystem from the shoreline on the Beaufort Sea coastline, south across the coastal plain, through the foothills and the north slope of the Brooks Range (it's all tundra from the divide north to the Beaufort Sea), and sweeping down the south slope to the boreal forests and the northern floodplain of the Yukon River. Most of this area looks as it has for thousands of years, and it is ecologically complete and intact with a full suite of life including a complex of top-level predators.

Why would it hurt to develop the coastal plain portion of the Refuge? This area is the calving area for the 150,000-strong Porcupine Caribou Herd, a herd that is a vitally important subsistence resource for the Gwich'in Athabaskan Indians that live south of the Brooks Range in Alaska and Yukon Territories (where the caribou herd winters). The herd concentrates on the coastal plain during a mass birthing in late June/early July, and support a whole host of predators (brown bears, wolves, wolverines, and Golden Eagles) that converge for this annual feast. The caribou are also an important subsistence resource (second to bowhead whales) for the Inupiat Eskimos of the Alaska North Slope.

During my time in Alaska and under the current administration, there have been deliberate misrepresentations by high ranking Department of Interior officials (particularly by former Secretary of Interior Norton under President George W. Bush) of impacts to the affected area and research done on caribou response to oil pipelines. **A prominent caribou researcher with many years of experience with the Porcupine Caribou Herd told me that pregnant females and females with calves stay far away from oil pipelines (based on work done in the Prudhoe Bay area).** A spider web of pipelines connecting production wells, and associated structures and airfields, would assuredly have dire long-term consequences for the herd and associated predator populations, and likely the tundra habitat (not to mention the subsistence hunters who will NOT be allowed to hunt anywhere near a pipeline).

The coastal plain is also an important migration area for Regional priority species Yellow-billed Loons and nesting and migration habitat for a host of different shorebird species (for example: Buff-breasted

Sandpiper, Black-bellied Plover, American Golden Plover, Semipalmated Plover, Pectoral Sandpiper, Semi-palmated Sandpiper, Long-billed Dowitcher, Stilt Sandpiper, Red and Red-necked Phalaropes, Bar-tailed Godwit, and Baird's Sandpiper.) There are also important Endangered Species considerations given the increasing importance of this area for ESA threatened Polar Bears (Critical Habitat for denning) and the fact that ESA threatened Spectacled Eiders nest there. The coastal plain is also important in some years for as many as 350,000 Lesser Snow Geese (that nested in a western Canadian colony) to fatten on sedge rhizomes before migrating south.

Development of this area would go directly against the purposes of the Arctic Refuge as stated by the U. S. Congress. It would be a colossally bad decision if this jewel of the Refuge System was forever despoiled in exchange for gas and oil that we don't even need.

Thank you for your consideration.

Russell M. Oates

Chief, Division of Migratory Bird Management, USFWS Alaska Region (retired)

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Conserve wild things, protect wild places.