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[EXTERNAL] Arctic National Wildlife Refuge scoping comments from Barry Whitehill

1 message

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To: blm_ak_coastalplain_EIS@blm.gov

Attached are my scoping comments re: opening Arctic National Wildlife Refuge to oil drilling/exploration.

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BHA Arctic Comments by Barry Whitehill.docx

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Bureau of Land Management
Attn: Coastal Plain Oil and Gas Leasing Program EIS
222 West 7th Avenue, #13
Anchorage, Alaska 99513

To whom it concerns,

As an Alaskan my family, like many, rely on wild game for our meat. Arctic National Wildlife Refuge has been my place for harvesting caribou. Over the years I have floated, hiked, and mushed into Arctic Refuge to do so. Traveling up Ignek Valley from the Canning River to the Sadlerochit Mountains has provided me views of the unmarred Arctic Coastal Plain that makes it easy for me to visualize what the vistas might have been like for Lewis and Clark in the upper Missouri country. Having lived and traveled extensively in the western United States, I have not found a similar vista left in the Lower 48 that doesn't have roads, lines, or fences scarring the landscape to diminish the feel. My annual pilgrimages to Arctic National Wildlife Refuge is really about nurturing my soul.

Over the years I have had the honor of sharing this experience with visitors from several foreign countries and the Lower 48, and in 2016 and 2017 I led groups of PTSD veterans and urban teenagers affiliated with Soul River, Inc. on remote Arctic Refuge river floats. I have seen the transformation and healing that the Arctic National Wildlife Refuge brought to each of these visitors. I believe this is the true value of this undeveloped landscape. If the short-sighted interests continue with oil development, it will be gone forever, as will Alaska as "the Last Frontier".

The National Petroleum Reserve, just west of the 1002 area is 22.8 MILLION ACRES specifically dedicated to and set-aside for oil development on the North Slope. Why must the entire slope be open to drilling? This is not a balanced approach to managing our public lands for all human values, especially in an economic era where we are exporting oil and gas, not just developing this oil for energy self-reliance.

Two years ago, we lost our opportunity to hunt caribou on federal land in Unit 23 when reports of increased airplane traffic changed caribou migration patterns. Now, only local, federally qualified subsistence hunters can hunt caribou there. Who's to say that that developing this portion of the Porcupine caribou herd's calving area won't change their habits. How can we ensure that we don't lose our opportunity to hunt this herd as well? Current oil fields on public land on the North Slope are closed to public access. Developing part of the Arctic National

Wildlife Refuge for oil and gas is equivalent to transferring currently publicly accessible lands into private hands. Will there be any mitigation measures to off-set loss of access to hunt wild public lands?

The proposed oil lease area is an important nesting area for migratory birds. It is also an area with limited water resources. How will the construction and operation of drilling pads and associated infrastructure be using the limited water resources? What potential impacts will that usage have on unique Arctic, sensitive populations of yellow-billed loons, yellow wagtails, spectacled and Stellar's eider, plus the myriad other migratory birds that nest in that area? This includes expansion of egg eating ravens by creating raven nesting habitat with increased towers and poles across a pristine landscape. Will there be raven control measures implemented?

In addition to water usage, will there be vector control during construction and during summer work seasons? This is a biologically rich area and mosquitos and other insects are the primary food source for many migratory birds that use this area for nesting. Also in regards to the effects development will have on flora and fauna, what steps will be taken to monitor and control invasive plant species that will be brought in with infrastructure construction and upkeep?

Initially, it was said that there would be a mere 2,000 acres of surface impact due to this oil drilling activity in Arctic National Wildlife Refuge. At the Fairbanks scoping meeting it now talks about 2,000 acres per lease area. Where does it stop? Does this figure include surface roads for seismic exploration, gravel pits, digging sites, and surface roads to support the drilling operation or does it only apply to the drill pads? Is this a continual disturbance figure per lease? In other words, if some of the disturbance is "restored", will this provide an opportunity to disturb additional land within a lease area. Since there has never been a complete restoration of Arctic tundra habitat back to what was there prior, how is restoration to be done in these areas? What will be the definition of a "successful" restoration?

With the multitude of disturbances associated with oil development, will they all be archaeologically reviewed? For example, for pipelines, Section 106 only applies to the USACE jurisdictional stream crossings so a 100ft buffer around any stream crossings. The majority of pipeline disturbance often receives no archaeological survey as segmentation of the project is not considered for pipelines for the most part. Would this be the case on Arctic National Wildlife Refuge? With the climate change increasing the melt of the permafrost layers, I have seen a "treasure trove" of artifacts and Pleistocene bones being discharged along the streams and rivers. Much of this thousands of year-old material is wood, antler, and bone that normally would have disintegrated centuries ago in other climates.

Climate change apparently is also forcing polar bear populations to den on-shore. If polar bears are found in or near oil exploration areas, how will this alter oil activities?

The Porcupine herd migrates internationally. How will the petroleum industry's impacts in this calving area affect the other Alaskan Gwich'in communities that were not included in the scoping hearings, as well as the Canadian communities that rely on the caribou for subsistence food? Many communities across northern Canada are seeing a decline in caribou numbers. The

Porcupine herd has been an exception as it continues a growth trend, how can we ensure that drilling activity in an important calving ground won't disrupt the herd's health?

With Arctic National Wildlife Refuge's importance to the international conservation community as an intact, pristine ecosystem, no exploration and development restrictions should be less restrictive than what is currently in place for oil exploration and extraction activities on the National Petroleum Reserve! Frankly, this process of gathering scoping comments from the public and having limited community meetings, gives the feeling of being "steam-rolled." Few of the specific development impacts have been quantified in order to provide informed scoping comments. Lastly, the insult to injury of this short-sighted venture is that it will undoubtedly lead to increasing long term climate change impacts to this fragile ecosystem.

Sincerely,

Barry Whitehill