



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] Coastal Plain Oil and Gas Leasing EIS Comments

1 message

Geoff York <GYork@pbears.org>

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To: "blm_ak_coastalplain_EIS@blm.gov" <blm_ak_coastalplain_EIS@blm.gov>

Please find in the attached comments from Polar Bears International on the proposed EIS for the Coastal Plain Oil and Gas Leasing Program, Alaska.

Regards,

Geoffrey S. York

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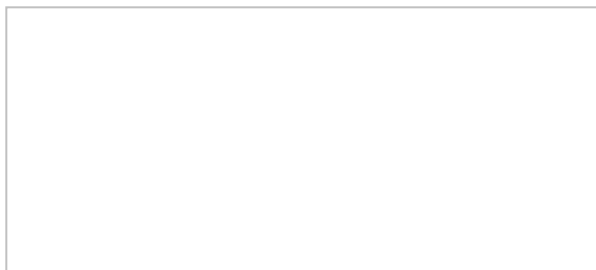
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**BLM Refuge EIS Comments PBI 2018.pdf**

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Comments on Scoping Issues for the Proposed Arctic Coastal Plain Oil and Gas Leasing EIS

Polar Bears International (PBI) is the only conservation organization whose sole passion and focus is polar bears. Consisting of a team of conservationists, scientists, and volunteers, PBI exists to help secure a future for polar bears across the Arctic. Our staff scientists have a combined 40 years of experience working on the ground in Alaska for both PBI and formerly with the USGS Alaska Science Center. Our Chief Scientist, Dr. Steven Amstrup, pioneered modern research techniques on polar bears in Alaska from the late 1970's and has done extensive research across the coastal plain of the Arctic refuge. Our Senior Director of Conservation, Geoffrey York, led efforts to develop polar bear den detection techniques in Alaska and has 16 years of polar bear capture experience. Our Director of Conservation Outreach and Staff Scientist, Alysa McCall, spent years studying aspects of polar bear denning ecology in Hudson Bay, Canada.

In response to the Public Comment period for the BLM Coastal Plain Oil and Gas Leasing EIS pursuant to the Tax Act (Public Law 115-97, Dec. 22, 2017). Polar Bears International would like to highlight the following concerns and areas for enhanced mitigation.

The Northern coast of Alaska, from the Colville River to the West and the U.S. Border with Canada to the East, contain most of the prime maternal denning areas for Alaska's Southern Beaufort Sea polar bear population, including significant denning activity within the Arctic National Wildlife Refuge (Refuge). The Coastal Plan of the Refuge remains essentially intact wilderness, often called America's Serengeti, and is also known for its caribou, muskoxen, and migratory birds. For anyone who cares about polar bears, or wildlife more broadly, the potential impacts from oil and gas exploration and development are a grave concern.

The Refuge coastal plain is vitally important to polar bears. Pregnant female polar bears head to this area every fall to create snow dens where they give birth to their young. In fact, the region has higher concentrations of polar bear maternal denning habitat than other coastal areas on Alaska's North Slope. In recent years, the Refuge has become even more important as a polar bear denning area as historically stable sea ice in the Beaufort Sea has deteriorated, forcing more polar bears to den onshore, rather than risk giving birth on unstable ice.

In a recent examination of the Southern Beaufort Sea polar bear population, scientists from the United States and Canada found that during the first decade of the 21st century, the number of polar bears in the southern Beaufort Sea dropped by approximately 40 percent.

The research, led by scientists at the U.S. Geological Survey, found that survival of adult bears and cubs was especially low from 2004 to 2006, when most of the decline occurred.

Survival of adults and cubs began to improve in 2007 and the population stabilized at approximately 900 bears in 2010, the last year of that study. However, the survival of juvenile bears declined throughout the 10-year study period (2001-2010), suggesting that conditions remained unfavorable for young bears newly separated from their mothers.

Scientists suspect that limited access to seals during both summer and winter contributed to low survival during this period. Although some bears in this population now come onshore during the autumn open water period, most stay with the sea ice as it retreats north into the Arctic Basin and far from shore where few seals are thought to occur. Similarly, the thinning and increasingly mobile winter ice is susceptible to breaking up and rafting, which can create rough and jumbled ice conditions that may make it harder for polar bears to capture seals. However, other potential causes, such as low seal abundance, could not be ruled out.

While it might be possible to explore for and develop the potential oil and gas under the Coastal Plain of the Refuge with minimal wildlife impacts, a hastily developed plan proposed by an administration that favors no regulatory safeguards for humans or wildlife fosters little optimism that such a possibility would be realized. Given the recent decline of this population, and expectation of continued decline as Arctic temperatures grow warmer, any additional sources of direct or indirect disturbance and mortality should be conservatively weighed and carefully managed.

Avoidance of potential maternal denning areas should be a priority closely overseen by the U.S. Fish and Wildlife Service and their research partners at USGS. Available maps of historical denning areas combined with denning habitat maps can help guide exploration planning and mitigate potential disturbance. Phasing exploration away from the coast (20-mile buffer) until late spring may also limit the potential for disturbance.

Existing tools for polar bear den detection should also be maximized and include the proper application of aerial Forward Looking Infrared (FLIR), hand held or ground based FLIR, and the use of scent trained dogs for confirmation. However, it should be emphasized here that FLIR den detection is only effective in fairly tight environmental windows as indicated in Robinson et al. 2014 (wind speed, sunlight, stable temperatures, precipitation). Improved den detection tools should be developed.

In addition to the Coastal Plain of the Refuge being a critical denning area for denning polar bears, all polar bear habitat faces profound impacts from climate change unless we transition away from using fossil fuels for energy. Warmer temperatures mean less sea ice habitat, which polar bears rely on to catch their seal prey. Encouraging more fossil fuel usage, as opening the Refuge would do, will only add to ongoing global warming at a time when Nations have fully recognized the need to rapidly reduce emissions.

If we continue to follow a “business as usual” reliance on fossil fuels, including the development of the already proven reserves, average annual temperatures in Alaska’s Arctic are projected to be more than 10 degrees Celsius (18 degrees Fahrenheit) higher at century’s end than they are now. Such high temperatures would assure ice-free summers in the Arctic, with devastating impacts on polar bears, other Arctic wildlife, along with the communities and existing infrastructure across the North Slope.

With “on the ground” exploration and drilling activities posing a threat to polar bear denning sites, and prolonged reliance on fossil fuels continuing to melt the sea ice polar bears need to catch their prey, oil and gas development in the Refuge would serve a double whammy. Opening the Refuge to drilling, therefore, is a path we should avoid—for the sake of polar bears, our children, and our grandchildren.

