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## [EXTERNAL] Comments on Arctic Refuge EIS Scoping

1 message

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To: blm\_ak\_coastalplain\_EIS@blm.gov

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Comments attached.



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**Arctic Refuge scoping comments ppourchot 6-18-18.docx**  
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## **Comments on BLM Scoping for Arctic National Wildlife Refuge Oil and Gas Leasing Program**

Notwithstanding the authorization of oil and gas leasing in the “1002 Area” of the Arctic National Wildlife Refuge by 2017 Tax Act, nothing in that law altered the underlying purposes and management prescriptions for the Refuge contained in the Alaska National Interest Lands Conservation Act of 1980, especially “special values” in Section 304(g)(2)(B). Nor did the Tax Act alter the requirements of NEPA and the leasing program to be conducted similar to that conducted for the National Petroleum Reserve-Alaska.

Consequently, in the EIS analysis it is incumbent on BLM to comprehensively identify and analyze all significant impacts that may result from exploration, development, and production of oil and gas from the 1002 Area. These impacts must also include those occurring outside the 1002 Area, including other wilderness areas in the Refuge, as well as lands and waters outside Refuge boundaries.

The 2015 Comprehensive Conservation Plan adopted by the US Fish and Wildlife Service identifies many of the purposes and “special values” of the Refuge warranting conservation protection. Notable among those is the narrow coastal plain which is the biological and ecological “heart” of the Refuge. This region provides key habitat with the highest productivity for calving and migrating caribou, waterfowl, nesting shorebirds, and a host of other wildlife, including terrestrial denning sites for polar bear. The report called for in Section 1002 of ANILCA, issued in 1987, found that “The Arctic Refuge is the only conservation system unit that protects, in an undisturbed condition, a complete spectrum of the Arctic ecosystems in North America.” It further found that “[t]he 1002 area is the most biologically productive part of the Arctic Refuge for wildlife and is the center of wildlife activity.” Impacts from oil and gas exploration and development on this unique and biologically important area must be identified and analyzed in the EIS.

The 2015 CCP also identified and analyzed significant river resources in the Refuge. The CCP determined 10 rivers in the Refuge to be eligible for inclusion in the National Wild and Scenic River system, including four rivers which flow through the 1002 Area: The Canning River, the Hulahula River, the Okpilak River, and the Jago River. Of these the Hulahula River was recommended for formal Wild and Scenic River designation.

All these rivers, plus the Aichilik River, receive significant recreational use and act as wildlife corridors between the Brooks Range and the coastal plain. It must be recognized in the EIS analysis that recreational use of these rivers, for both floating and hiking, most commonly begins at informal airstrips in Refuge wilderness in the Brooks Range and continues into and through

the coastal plain of the 1002 Area to reach aircraft or boat pick-up locations. The 1002 Area provides an essential component of the wilderness recreational experience and well as a varied ecosystem for the river-oriented trip. Similarly, these river corridors provide essential habitat for wildlife to reach seasonal foraging needs. Oil and gas exploration, development and production could have profound effects on these recreational and wildlife uses and must be addressed in the EIS.

Thank you for this opportunity to comment.