



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] Comments on Scoping Program for the coastal plain of the Arctic National Wildlife Refuge

1 message

Ann Rappoport <agrappoport@gmail.com>
To: blm_ak_coastalplain_EIS@blm.gov

Mon, Jun 18, 2018 at 11:31 AM

To the Bureau of Land Management,

attached, please find my comments in response to your recent public comment period (which closes 6/19/18) requesting scoping comments on a proposal to open the coastal plain of the Arctic National Wildlife Refuge to oil and gas development. I expect you to enter these into your official public record for this issue.

Thank you,

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Dear Bureau of Land Management –

June 18, 2018

Thank you for this opportunity to provide scoping comments on a proposed leasing program for the coastal plain of the Arctic National Wildlife Refuge (Arctic Refuge). I retired from the U.S. Fish and Wildlife Service (USFWS) as a supervisory biologist a few years ago after a 33-year career there, including 9 years working on the issue of whether the Arctic Refuge coastal plain should be opened to drilling in response to section 1002 of the Alaska National Interest Lands Conservation Act (ANILCA). This included stints monitoring the carefully planned 1983-85 seismic and surface geology exploration program on the Refuge, many public meetings in Refuge villages as well as in Anchorage on that exploration program, overviews of the biological field work, and serving as lead for the environmental assessment team that wrote those sections of the 1987 Environmental Impact Statement on whether to open the coastal plain to oil and gas development.

More recently, while working for a national non-profit organization, I worked with the Bureau of Land Management (BLM) on their Regional Mitigation Strategy for oil development in the eastern National Petroleum Reserve-Alaska (NPR-A), attending multi-day public meetings in Fairbanks and Utqiagvik. There, many people from Utqiagvik, Nuiqsut, and other North Slope communities recounted how current oil development, as well as climate change, are negatively affecting their ability to harvest fish and wildlife resources for essential subsistence, causing significant health and other concerns.

Congress has continued to protect the tremendous biological, subsistence, and cultural values of the Arctic Refuge coastal plain for several decades. There is a current effort in Congress to continue protection for this special place. **Given those tremendous values, and particularly in light of the extent of oil development now present across the rest of the North Slope of Alaska, climate change and other factors described below, I thoroughly agree with that effort and encourage you to analyze and select a no action alternative.**

Neither the biological importance nor the geology of the Refuge Coastal Plain has changed since the 1980s studies. But, in a clause on an unrelated bill, and without careful debate, Congress recently passed legislation to open the coastal plain to development. Reference to those and more recent studies provide documentation regarding: the vast numbers of the international Porcupine caribou herd calving on the coastal plain and for whose protection there is an international treaty with Canada; the immense numbers of snow geese and other migratory birds breeding here; polar bears denning and increasingly using the coastal plain as their sea ice hunting platforms melt with our warming climate; the fish in the rivers that feed the people and fertilize the arctic biome; and countless other species that depend on this unique ecosystem for various life stages. There are also the Native Alaskans who have called this place home and who have subsisted off those renewable resources for thousands of years. All these resources have been protected under the purposes of the Arctic National Wildlife Refuge as initially established nearly 60 years ago and updated in the 1980 Alaska Lands Act. Notably, the USFWS recommended a Wilderness designation for the area in 2015 after an extensive analysis.

Changes throughout the North Slope over the past several decades make it even more imperative for BLM to not rush into an irreversible development program. These include:

- 1) Adjacent state lands to the west are now crossed by an extensive infrastructure spider web and activities of oil and gas production (see Figures 1, 2, 3, and 4, attached). Other areas are under

planning for additional development, already informed by recent and advanced geological exploration and test drilling information.

- 2) On the BLM-managed National Petroleum Reserve-Alaska, drilling and leasing, with some initial production, extends west from State lands. Portions of the NPRA have also been informed by recent, advanced exploration.
- 3) This extensive development on state lands, and development and opportunities now extending into the NPRA, together cover about two-thirds of the North Slope, leaving the coastal plain of the Arctic Refuge as the last undisturbed wildlife and subsistence arctic ecosystem within the North Slope of Alaska and the United States. The Arctic Refuge coastal plain is narrower than the plains on those other areas, leaving no alternatives for displacing wildlife. If leasing and development of the coastal plain is permitted, it will ultimately destroy this globally significant habitat and migratory corridor for so many species.

Through 2011, over 18,000 acres have been directly disturbed by oil and gas development on State lands immediately west of the Arctic Refuge, with additional acreage and significant areas disturbed since then, including on the NPR-A (Hillmer-Pegram, Kevin. 2014. *A Synthesis of Existing, Planned, and Proposed Infrastructure and Operations Supporting Oil and Gas Activities and Commercial Transportation in Arctic Alaska*. University of Alaska, Fairbanks. 46 pp.). Further details in that publication document the 336 miles of electric transmission lines, 491 miles of in-field pipeline corridors, nearly 5400 acres of gravel mines in rivers and other infrastructure features included in this disturbance and loss of habitat and are shown here, Figures 1, 2, 3, 4.

- 4) People of Nuiqsut did not worry when Prudhou Bay developments were 70 miles away, but now that drilling is within sight and sound, they are concerned about asthma that their children are suffering, cancer rates, and decreasing availability of subsistence use resources. Utqiagvik residents at BLM's Regional Mitigation Strategy meetings reported that the caribou they could once easily hunt within a day or two to feed their family all year, are no longer using nearby habitats making it much more difficult to subsist.
- 5) Climate change is exacerbating all these changes, and at a faster and faster rate – polar bears are spending more time on land and are having greater difficulties finding food, resulting in increasing potential for human/bear conflicts. Invasive species are moving north where they will compete for habitats and food with native species. Freeze up is later and snow melt earlier, shortening the period when ice roads and winter exploration can occur without damaging the tundra. Coastal erosion, melting permafrost, and the changes in rivers freezing and thawing all affect the ability of Kaktovik and other North Slope residents to safely travel and obtain needed subsistence resources. Mitigation of climate change will only come from a slowdown of oil and gas production and transition to clean, renewable energy resources. Yet that is not what is being considered here.

While the specific development footprint for the coastal plain may be limited to “only 2,000 acres” - one look at the maps of the existing spider web of oil development on Alaska's North Slope shows the much, much larger area that would be involved. As noted in 3), above, and seen in attached Figures 1, 2, 3, and

4, habitat loss, disturbance and secondary impacts occur throughout a significantly much, much larger area – one extending about 135 miles by 35 miles on State lands alone, an area similar in size through which development on the Arctic Refuge coastal plain is now being considered. Potential offshore developments in the Chukchi and Beaufort Seas will add further disturbances and habitat alterations on terrestrial North Slope areas with support activities and additional infrastructure requirements on land.

I urge you to carefully look at these figures, and thus the vast areas of Alaska's North Slope that have already been developed, where developments are planned to expand in the next 5 – 10 years, and where existing leases and scheduled lease sales on the NPRA and state lands mean that further developments are likely. The coastal plain of the Arctic National Wildlife Refuge is the only area remaining protected where critters and people can travel from the coast through tundra to the mountains without crossing industrialized areas, and where there can be the needed large east/west migratory corridors and habitats used by caribou herds, migratory birds, and other species. Some major ecosystem corridor through Alaska's north slope must be maintained in a state essentially undisturbed by industrial activities - for the fish and wildlife that require these habitats, the people who subsist off the land and resources inhabiting it, and the people who thrive from rare visits to this wilderness or enjoy the photos and stories of others who have visited.

For BLM, as you implement this process, I urge you to hold public hearings at each step, and ensure that the EIS you have been charged with developing covers all alternatives and includes extensive participation from the USFWS, the agency charged with managing, and which has the expertise to manage, this area. The USFWS has been studying the coastal plain's fish, wildlife, and habitats for decades; they are the agency that best understands potential impacts and how mitigation is not realistic for development. **There must be a no action alternative in the EIS for a lease sale.** With the input you have already received, and will continue to receive from the public, the people of the North Slope and the USWS, it should be apparent that the proper conclusion, is that there should be no lease sale here. I hope you will make that correct choice!

During preparation of the 1987 EIS on coastal plain development, I was witness to how political appointees changed the scientific recommendations originating from the field. I urge you to document and ensure transparency as decisions are made throughout this current process. You owe it to the American people to be thoroughly transparent as this issue moves up the decision ladder, and you must ensure that all Americans can weigh in on the future of this important national treasure, and that it remains a National Wildlife Refuge with purposes as defined in ANILCA.

There is no alternative or effective mitigation for the fish, wildlife, habitats, and subsistence users of the Arctic Refuge coastal plain if it is developed for oil and gas. However, there is an alternative for the BLM in scoping for a leasing program on the Refuge. And that is to slow down, properly consider and analyze all the issues, and select the no action, or no leasing alternative.

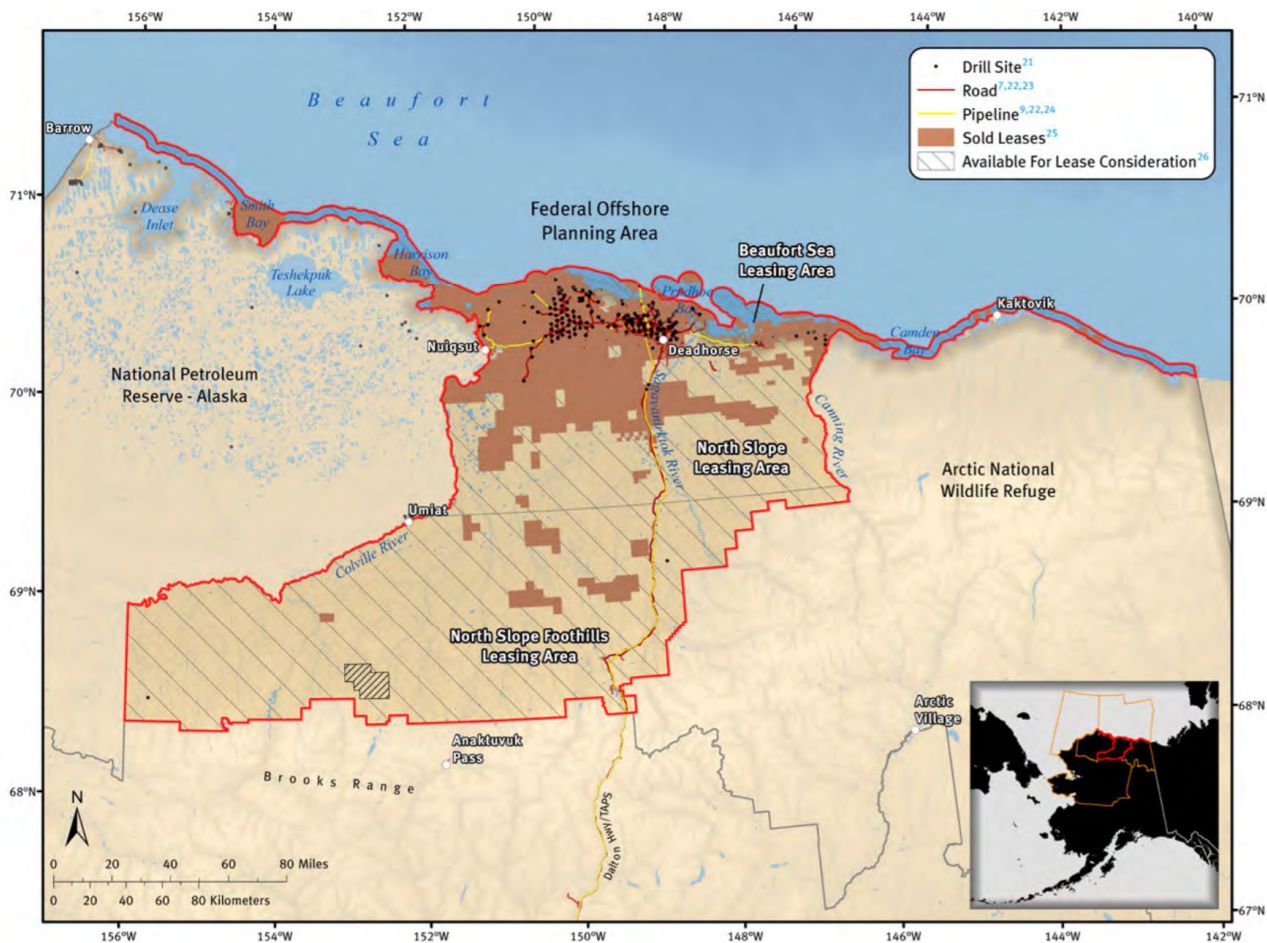
Thank you for your attention to my comments. I would be happy to provide further information or discuss these comments with you (agrappoport@gmail.com 907-230-3187).

Sincerely,

Ann Rappoport

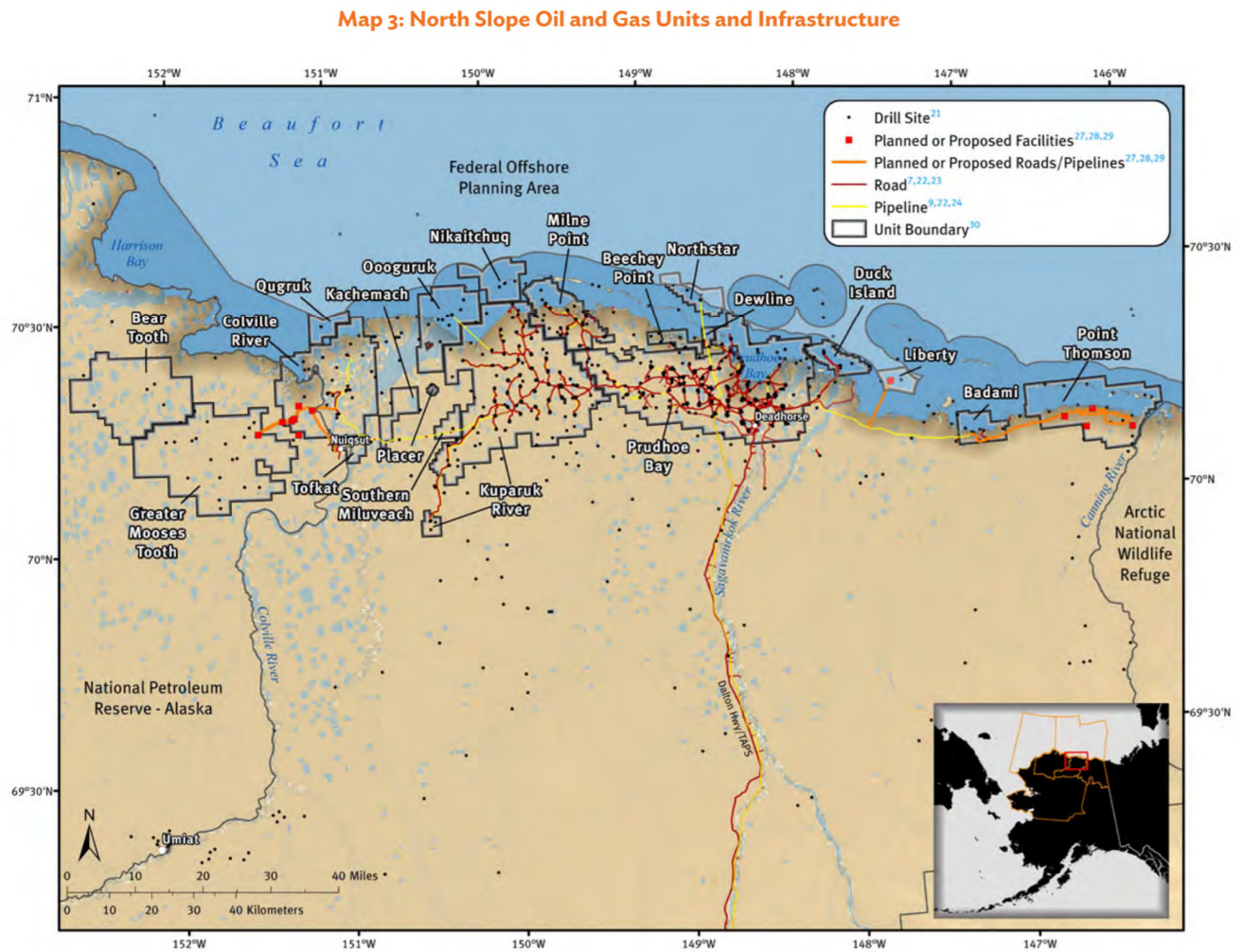
Figure 1. Extent of leased areas and infrastructure development across the North Slope of Alaska, 2014.

Map 2: Central North Slope and State Waters: State Leasing Areas and Existing Infrastructure



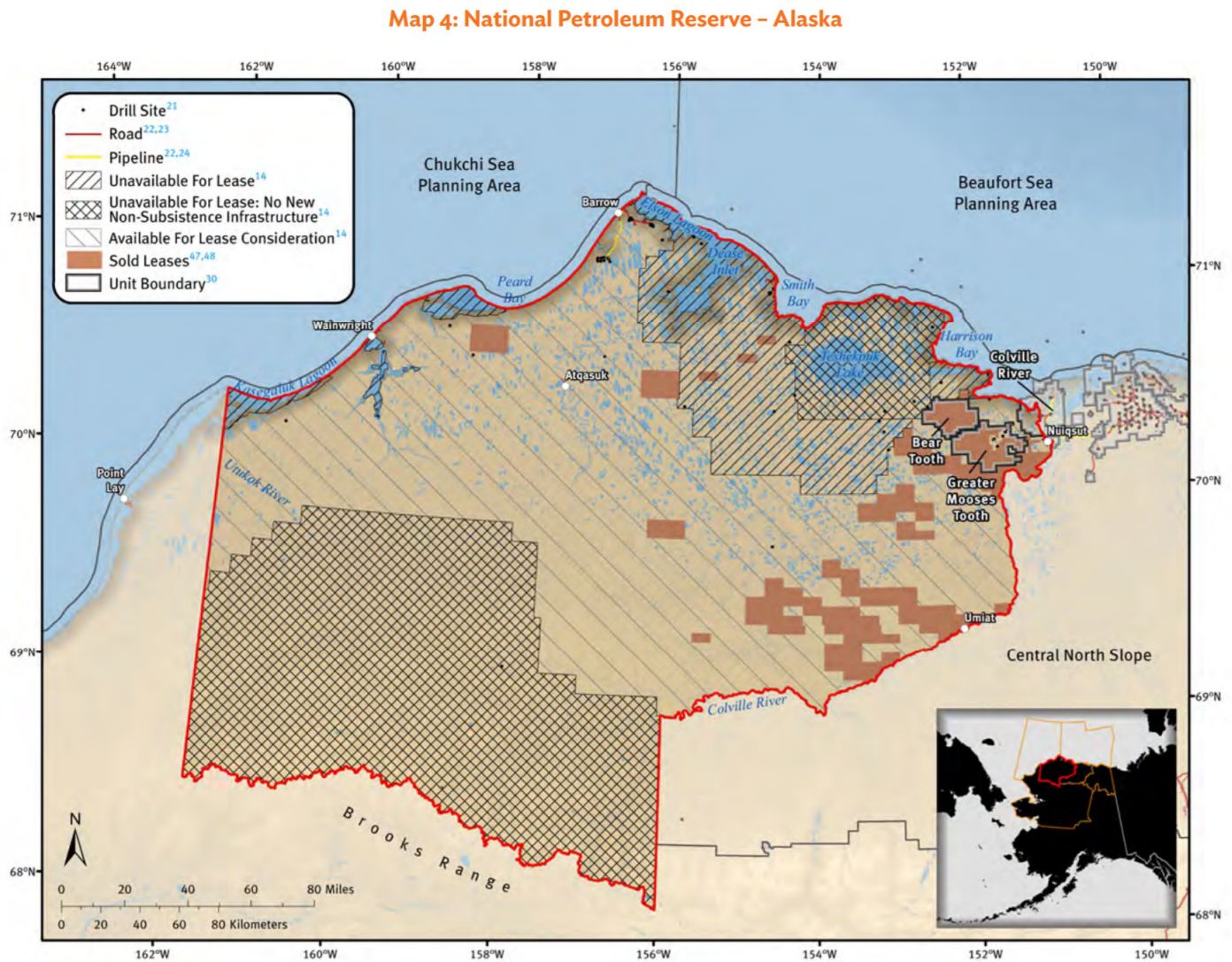
This is Map 2 from the 2014 document: A Synthesis of Existing, Planned, and Proposed Infrastructure and Operations Supporting Oil and Gas Activities and Commercial Transportation in Arctic Alaska by Kevin Hillmer-Pegram, University of Alaska Fairbanks. 46 pp.

Figure 2. Extent of drill sites and development units across North Slope of Alaska



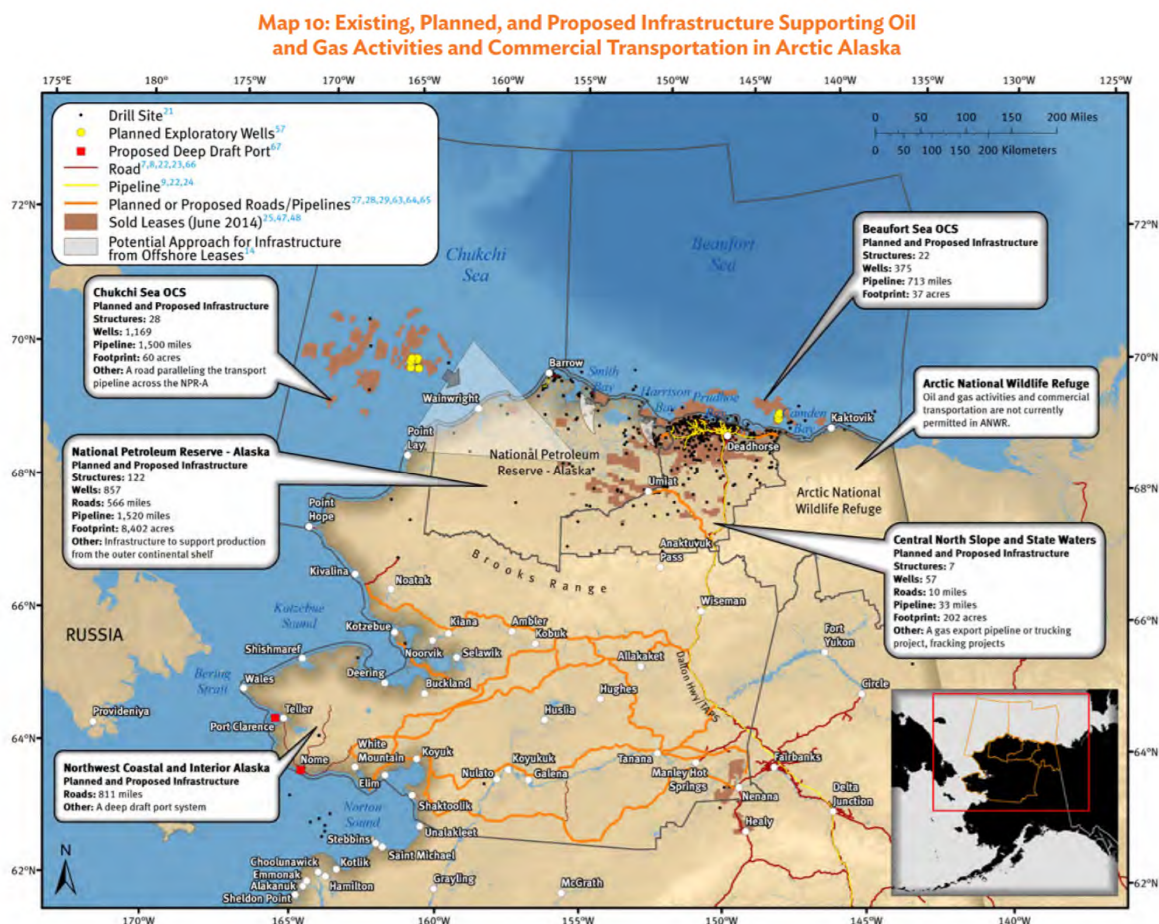
This is Map 3 from the 2014 document: A Synthesis of Existing, Planned, and Proposed Infrastructure and Operations Supporting Oil and Gas Activities and Commercial Transportation in Arctic Alaska by Kevin Hillmer-Pegram, University of Alaska Fairbanks, 46 pp.

Figure 3. Recent extent of leasing and potential development on National Petroleum Reserve – Alaska.



This is Map 4 from the 2014 document: A Synthesis of Existing, Planned, and Proposed Infrastructure and Operations Supporting Oil and Gas Activities and Commercial Transportation in Arctic Alaska by Kevin Hillmer-Pegram, University of Alaska Fairbanks, 46 pp.

Figure 4. Existing, Planned, and Proposed Infrastructure Supporting Oil and Gas Activities and Commercial Transportation in Arctic Alaska, outside the Arctic National Wildlife Refuge. Note how the Arctic Refuge Coastal Plain is the last remaining undisturbed Arctic ecosystem in the United States.



This is Map 10 from the 2014 document: A Synthesis of Existing, Planned, and Proposed Infrastructure and Operations Supporting Oil and Gas Activities and Commercial Transportation in Arctic Alaska by Kevin Hillmer-Pegram, University of Alaska Fairbanks, 46 pp.