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[EXTERNAL] Public comment submission for Coastal Plain Oil and Gas Leasing EIS

1 message

Ken Robertson <akumal50@yahoo.com>

Mon, Jun 18, 2018 at 8:26 PM

Reply-To: Ken Robertson <akumal50@yahoo.com>

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

Attached to this email is a document which contains my comments for the scoping process for the Arctic National Wildlife Refuge Coastal Plain oil and gas leases.

This issue is very important to me and I have carefully prepared my comments for your review. Thank you for your work on this very important issue.

Please reply to me using this email if you are unable to open this attachment.

Sincerely,
Denise Robertson



Public Scoping Comments DRobertson Coastal Plain Oil and Gas Leasing EIS.pdf

146K

Scoping comments for Coastal Plain Oil and Gas Leasing EIS – Arctic National Wildlife Refuge

Submitted by: Denise Robertson, 2461 NW Roosevelt Drive, Corvallis, OR 97330 on 06/18/18;
this document contains 7 pages.

Email: AKUMAL50@yahoo.com

Deadline: 06/19/2018

The future of the Arctic Coastal Plain located within the Arctic National Wildlife Refuge (ANWR) is currently under review for oil and gas leasing and development. Although future oil and gas leases are to be offered in accordance with the Tax Act, the way in which this has come to pass must be emphasized. It was the result of a political bartering between members of the Senate and the lobbying power of the oil companies and was not based on the concrete scientific data and facts, which include, the documented results of the negative impacts which oil and gas development has brought to the Arctic coastal plain west of Prudhoe Bay. If the current conditions in the area west of Prudhoe Bay had been part of this decision, the clear answer would have been to leave the ecosystems of the coastal plain of ANWR intact and undisturbed by human interference in the form of oil and gas leases.

The U.S. Fish and Wildlife Service (USFWS) has conducted many years of scientific research to best understand the delicate balance which exists throughout the area of northern Alaska, which lies north of the Arctic Circle. It has been well documented by USFWS that the Arctic Coastal Plain of ANWR, in particular the 1002 area, is key to the survival of many species of animals and plants, which depend on the Arctic tundra and coastal plain undisturbed and intact. The impacts of global climate change have already been impacting the temperatures and weather patterns which is well documented by federal and state agencies in Alaska with negative impacts on the ocean ice packs, the permafrost, and the health of the animal and plant communities. These facts cannot be ignored to satisfy the oil companies who want to be in control of any areas of the United States that may have oil and gas resources. If there is any place in the United States where oil and gas development must not be allowed to be further developed, it is the area currently under review by the BLM.

The U.S. Fish and Wildlife Service recognized that the coastal plain is worthy of permanent protection when it recommended in 2015 that most of the non-wilderness lands in the refuge be designated as wilderness. Their ANRW website clearly identifies the dependence of Arctic wildlife on the Arctic Coastal plain, not to mention the research and documentation that has been published.

The key points that I think must be considered, evaluated, and analyzed during EIS process are as follows:

The Arctic tundra and coastal plain are extremely sensitive to any human interference. This is a fact of Nature. There is no disputing it. It is well “documented” throughout the landscape in the

large area west of Prudhoe Bay, which has been developed extensively with oil and gas development. A review of the current condition of this large area west of Prudhoe Bay must be part of the scoping process. One only has to look at Google Earth, to see the impact that has been made with roads and oil extraction facilities. Not only have the roads and oil drilling sites caused permanent damage to the permafrost, but the toxic chemicals and industry debris have left the area in total disarray. Not only is the damage to the environment permanent, but all of the garbage and facility debris that have been carelessly left behind by the oil companies has not been hauled out and disposed of outside of the Arctic, which is the only acceptable means of disposal. In some examples, witnessed by people who have made the journey to personally witness the damage, at various locations, the facilities appear to have been abandoned at a moment's notice. Dishes are left on the tables, with food sitting on the dishes. It looks as though people simply walked away and left everything behind. Metal drums of toxic chemicals are sitting, the metal containers corroding and the chemicals left to pool on the ground and seep in to the soil. Why would they bother to take their debris with them? It would cost too much, right? And isn't the only thing the oil companies care about it their financial bottom line? The value of the environment carries no weight in their profit margin. The argument by the oil companies is that it is too expensive to remove. It wasn't too expensive to haul up to the Arctic and of course they never intended to dispose of it properly. I would like to ask if anyone at the Bureau of Land Management who is part of this review or will be part of the final decision, has ever witnessed on the ground what has become of this area west of Prudhoe Bay? I find it hard to believe that the pollution and debris were allowed legally in accordance with the leases between the oil companies and the federal government, therefore I assume that the enforcement of the development and operation of the gas and oil extraction under the terms of the leases has not been fully enforced by the federal government. There is time for representatives from the Bureau of Land Management to make a field trip to witness these areas and to also visit ANWR to see the contrast between an Arctic environment exploited for its oil resources and an area left undisturbed. In addition, be sure to recognize that in the past, seismic testing and exploration was done in the 1002 area of ANWR. Vehicles with large tires traveled many miles during the winter months when it was falsely presumed the impact from the vehicles would not impact the permafrost. The physical evidence proves this is not true. The wheel tracks did cause permanent damage the permafrost and tundra and it is still visible if one travels the area and looks for it; many miles of tracks. In other words, all the evidence that is needed can be seen with the naked eye and this past damage throughout the coastal plain must be identified in this scoping process.

There is no one who has any familiarity with Alaska, whether first-hand, or through the experiences of other people, who can deny that the Arctic Coastal Plain of Northern Alaska is an area that is unprecedented for its uniqueness in terms of its ecosystems and the animals and plants that live there. Fortunately, the Arctic National Wildlife Refuge (ANWR) received status as a wildlife refuge and it has been protected from the total decimation and corruption by those who would rather see the natural resources harvested for their profit, rather than

allowing this precious area of the world to remain as is, allowing the natural relationships that exist between the animal and plant communities to support each other without disturbance. Fortunately, the average tourist would not consider traveling to this remote, harsh environment, for that is the very thing that has kept this part of the world safe. On the other hand, with so few American citizens aware of this area, it has also been its Achilles heel.

The wildlife of the Arctic tundra depend on the coastal plain ANWR, including the 1002 area, for their survival. This area is critical, there is no substitution, there is no other suitable area for these animals to go. The coastal plain comprises only 10 percent of the Arctic Refuge. Yet from May to July, it is the center of biological activity on the Refuge.

Wildlife which must be considered in this scoping review include:

Polar Bears

In 2008 the Department of Interior listed the polar bear as a threatened species. Critical to the survival of the species is its need for suitable denning sites. The 1002 area is one of the last areas available for critical habitat for polar bears. The USFWS has documentation based on research which states the following: "Tracking of the collared bears identified 53 dens along the mainland coast, 26 (50%) of which were within the bounds of the Arctic National Wildlife Refuge. Twenty-two of the 53 dens (42%) were within the bounds of the 1002 area." As I noted earlier, the USFWS has research data that will provide the necessary information for this scoping process. It cannot be ignored.

Caribou

The life cycle of the Alaska/Canada caribou has been well documented and there have been documentaries and books produced which cover the amazing life story of this remarkable animal. Over millions of years, it has evolved and adjusted to living in a harsh environment. Every year the Porcupine Caribou Herd (approximately 190,000 in number) migrates up to 2700 miles round trip to arrive on the coastal plain of ANWR to have their calves. Some falsely claim the animals can adjust to the affects of oil and gas development. This is purely anecdotal, which comes from oil workers who say they have seen caribou roaming the area west of Prudhoe Bay. Oil workers are not scientists. Although it is true caribou have been wandering through the oil production areas, this is not evidence of the natural migrations and calving that used to occur. Research supports the claim that there is no other suitable habitat available to the Porcupine herd. You can simply look at a map and you will see that suitable habitat does not exist further east of the 1002 area. This data must be included in this scoping process. The Porcupine herd is the last remaining caribou herd in North America as yet undisturbed by human impact. This is a heavily weighted statement. Their life cycle cannot be impacted, certainly not for the estimated number of barrels of crude oil which would only support the U.S. for approximately one year. In addition, the Central Arctic Caribou Herd has traditionally used the area west and east of Prudhoe for its range of habitat. The Central Arctic herd has been impacted by the development of oil west of Prudhoe Bay and their number have declined. Once again, we have

actual proof of the impact of oil production on the Arctic Coastal Plain, this isn't someone's guess, it's real and can be seen with your own eyes.

The entire Porcupine caribou herd and up to a third of the Central Arctic herd use the Refuge coastal plain when calving is completed. This essential area contains forage and a variety of habitats that provide insect relief, including the coast, uplands, ice fields, rocky slopes, and gravel bars.

The caribou's annual visit to the Refuge coastal plain brings new life and vitality to the caribou. It is an important part of their life cycle. The coastal plain provides the caribou vital nourishment and a better chance of avoiding predators and insects. This relationship is part of the unaltered system that makes the Arctic Refuge such a wondrous place.

The oil industry says that the wildlife can survive amongst the oil production facilities and roads in the area west of Prudhoe Bay. I have seen photos of wildlife, such as caribou, wandering amongst the garbage and leaking drums of toxic chemicals. This is NOT survival of the species. I think WE ALL know this. The only people who believe it is okay are the oil companies and certain individuals with the State of Alaska who benefit financially and are willing to destroy habitat to do so. This is NOT justification.

Brown Bear

The barren ground brown bear (or grizzly) is unique to the Arctic tundra. It's life cycle is well documented. It survives most of the year on plants and small mammals, but during the caribou calving season, there is a short period of time, critical to the bear's diet, when the caribou calves and weakened adults, provide life sustaining sustenance to their diet. In addition, if oil development and production is allowed to occur, the impact to the fragile tundra ecosystem, will result in the collapse of plant and animal communities. As a top predator, the brown bear populations will suffer.

Migratory Birds

Over 200 species of migratory birds depend on the Arctic Coastal Plain for breeding grounds. With the impact to the coastal plain west of Prudhoe Bay, their habitat has been greatly reduced and ANWR must be preserved to protect their critical breeding grounds.

Musk Oxen

Many years ago, the invasion of the Arctic by white explorers and those who followed decimated the musk oxen of the Arctic tundra. Only through the dedication of hard working individuals has this species been brought back to their rightful place in the Arctic. They live in the Arctic tundra/coastal plain yearround, the only large mammal to do so. Their habitat has already been reduced by the current oil production and their safety will be further threatened if additional oil and gas development and production is allowed to occur.

Wolves

There are people who will say that there are plenty of wolves in Alaska and it won't hurt the population if the ones in ANWR don't survive. As scientists, I know the federal agencies who are involved in this scoping process understand that the wolves that exist today in the region of ANWR must be allowed to survive. They are part of the delicate balance of this ecosystem. Enough is already known about the mechanics of collapsing ecosystems and the wolves of ANWR are a critical component of this primeval ecosystem.

Natural relationships between predator and prey still prevail on the Arctic Refuge. Here the wolf's connection to the caribou and the land continues as it has for centuries. Untamed and free, the wolf is a symbol for the Refuge--a truly remarkable place.

Small Mammals

The small mammals are critical. They are the mainstay of all predator diets in the Arctic tundra. They are as vital to this ecosystem as any other animal and the permanent damage to the permafrost will result in irrecoverable damage to their habitat resulting to a decline in their populations.

Gwich'in Nation

Oil drilling could lead to chronic spills of oil and other toxic substances. The accompanying air, water and noise pollution would threaten the refuge's wildlife, potentially harming indigenous populations such as the Gwich'in, who survive by hunting. For centuries the Gwich'in people have become part of the delicate balance of the Arctic tundra environment. Their diet and health depend on the sustenance provided by the wildlife of this region. The Porcupine Caribou Herd is key to their traditional culture. They have lived along the caribou migration routes for thousands of years. A disruption to the caribou habits will no doubt impact the Gwich'in way of life.

Treaty between the United States and Canada

The U.S. has a treaty with Canada in which both countries agreed to protect the habitats of the Porcupine Caribou Herd. Most of the PCH's winter habitat exists in the Yukon and NW Territory of Canada, while the herd's only available summer habitat is on this specific stretch of the coastal plain (ANWR coastal plain. The fact there is a treaty points out the significance that both countries fulfill their promise. The governments of Canada and the Yukon and NW Territory have been very outspoken and concerned that the U.S. is moving forward to violate this treaty.

Impacts During Development and Production of Oil Industry Infrastructure On-Site

The remote location of the coastal plain makes any development a challenge. Permafrost evolved as a direct result of this climate and the resulting ecosystems which evolved depend on the "permanence" of the permafrost. It is well documented by both the oil industry and environmental scientists that construction of roads and facilities on the permafrost create huge challenges. For the oil industry, the challenge is construction of support mechanisms and

underlayments which will reduce the thawing of the permafrost. Their concern is that if the permafrost melts, their facilities and roads will sink. Their concern is not for the environment. They are only concerned about the loss of their infrastructure. Environmental scientists and concerned citizens are concerned that the oil industry will take extreme measures to try and prevent the destruction of their infrastructure. The biggest concern is that industry has come up with the solution that if they build gravel pads several feet thick, their buildings and oil extraction pads and road beds can be supported and will insulate their sites and roads from melting the permafrost. Once these pads and road beds are constructed, they will be there forever. There is no feasible way that this construction can ever be rehabilitated in the future. This is the norm in the lower 48, such as the oil, gas and coal production in the Western States. Once extraction is completed, the company is required to return the affected environment to its previous natural condition. But this would be impossible in the Arctic because the permafrost can never be restored and there will be destruction of the permafrost, no matter how thick the gravel is piled up. Not to mention the destruction to the environment. But this is just one piece of the problem. Where will the oil companies get the gravel? They won't be barging it in from outside the area. That would be cost prohibitive. The river beds will be ripped up to provide the gravels. This has already occurred in other areas where the oil companies have created developments on the tundra. There is no conceivable way that the stream beds can be restored to a normal condition once this has occurred. This is a pristine area. The health of the rivers will be destroyed. Three Arctic Refuge rivers are so magnificent they've been designated for special protections under the Wild and Scenic Rivers Act of 1968, and four other Arctic Refuge rivers have been recommended for inclusion. There is no wiggle room, no gravel can be removed from on-site locations to support the construction of the oil infrastructure. It would be devastating and irreversible.

In conclusion, any one of the points I have made in my comments should be enough reason to not allow oil and gas development and production on the coastal plains of ANWR and when the total sum of my points are added up, the decision should be an easy one to make. The concerned citizens of the United States should NOT have to justify WHY the oil companies should not be allowed to do their damage. It should have been the other way around. If this decision had been based on the oil companies having to prove they could develop this new area and build their infrastructure and remove oil and not cause any damage to the plants, animals, and environment, then the result would have been simple. There is not way the oil companies can prove this. Their past track records should be enough information. And how they have been allowed to continue to decimate the land west of Prudhoe Bay and not be required to follow the environmental safety regulations to not pollute the area and to restore it after their damage has been done is beyond comprehension.

I am a retired federal employee who spent my entire career working for a federal land management agency. I do understand the challenges of being required to fulfill the requests of Congress and the President of the United States. However, I also know, from personal experience, that there is a "right thing to do". It is critical to be objective and let the facts speak

for themselves, however, this means that the scientific information must be included, ALL of it. If anyone is going to strike the evidence from your work, let it be at the hands of those higher up the ladder. Do your best and do what is right. That's all you can do, and just possibly it will be enough. My faith rests in your hands.

If you are reading this final sentence, it means that someone on the BLM EIS staff has read my entire document. I pray this is true. Of all of the events and issues that have occurred this past year and a half, none has turned my heart to ice like this issue has. It is so WRONG. Somehow, what is RIGHT must prevail. This cannot be a political decision, it must be The Truth.

Sincerely,

Denise Robertson