



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] Scoping Comments Submitted for review. Oil and Gas Leasing EIS Arctic Refuge Coastal Plain

1 message

Ken Robertson <akumal50@yahoo.com>

Tue, Jun 19, 2018 at 1:53 PM

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

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

I have attached my comments for the BLM scoping review for the EIS for oil and gas leasing on the coastal plain of the Arctic National Wildlife Refuge.

Please review and include my comments in your analysis and the public record.

**Scoping Comments from Ken Robertson Coastal Plain Oil and Gas Leasing EIS.pdf**

138K

Arctic National Wildlife Refuge Coast Plain Oil and Gas Leasing EIS

Public Comment from Ken Robertson

Submitted: 06/19/2018 1:34 pm PDT

Address: 2461 NW Roosevelt Drive, Corvallis, OR 97330

I am deeply concerned that oil and gas leases for the Coastal Plain of the Arctic National Wildlife Refuge (ANWR) was added to the Tax Act and is now in the process of EIS analysis by the Bureau of Land Management. **There are several reasons why oil and gas leases should NOT be sold on the coastal plain of the Arctic National Wildlife Refuge.** There is a great deal of undisputed evidence that oil and gas exploration, development, and production cannot co-exist with the fragile environment of the Arctic tundra and coastal plain. The oil companies have already proven that they cannot explore for, develop and produce oil and gas in the Arctic without causing irreparable damage. This is unlike any other environment in the United States. As past-Congressman Mark Udall said after his first trip to ANWR, "Not in our generation, not ever again, will we have a land and wildlife opportunity approaching the scope and importance of the land that lies with the Arctic Wildlife Refuge."

The oil companies acknowledge that there are extreme challenges and environmental risks to working in the Arctic and if truth be told, there is not enough oil to make it financially feasible if the oil companies were forced to fulfill their lease obligations and construct their facilities without damaging the environment, operate within the requirements of their leases, and clean up after they exit from the area. If they complied with the regulations, they could not afford to go to the Arctic, however, for some reason, the oil companies have been allowed to pollute and damage the coastal plain west of Prudhoe Bay and in the Beaufort Sea north of the coastal plain. They were given the opportunity to show what they can do and they failed. They must not be allowed to do this again on the coastal plain of the Refuge. **It is America's only virgin stretch of Arctic coastline and the most biologically productive zone of the refuge.** If the oil and gas leases are allowed, this virgin stretch of coastal plain will never be the same again. This is not like surface mining in Thunder Basin National Grassland in Wyoming; the Arctic is a completely different environment and can only be compared to the evidence where the oil companies have damaged the western coastal plains of the Arctic.

I cannot understand how anyone could allow activity that will cause irreparable damage in this new area that is still relatively undisturbed. Environmental disturbance did cause permanent damage several years ago when large over-the-snow vehicles were allowed to travel across the coastal plain and tundra of the Arctic Refuge to conduct tests in the search for potential oil. The assumption was if these vehicles traveled during the winter, all would be okay. This however turned out to be false. Evidence can still be found in the form of tire ruts that developed when the permafrost was damaged underneath the weight of the tires and melting and collapse occurred. Miles and miles of tire ruts.

The wildlife which depends on the Coastal Plain, including but not limited to, the Porcupine Caribou Herd, the Central Arctic Caribou herd, the barren ground brown bear,

the polar bear, muskoxen, wolves, a variety of smaller mammals, over 200 species of migratory birds, and the delicate tundra environment of plants, lichens, and other living organisms, all require for their survival, that the Coastal Plain not be developed for oil and gas. There is no other place like this in the world. It is truly unique. The Porcupine Caribou Herd migrates up to 2700 miles round trip to arrive at this stretch of Arctic coastal plain calve in the summer. It is the longest migration route of any mammal in the world. The fact is the oil companies only see the world as what it can provide in oil and gas. It is an obsession to dominate all regions in the world and not be restricted for any reason. The overall health of this arctic environment has already been compromised due to global climate change; development of this region for oil and gas production will be the nail in the coffin. We must work to preserve this area and not allow it to be denigrated by the oil companies to maybe make some money on what may be only a year's supply of crude oil for the United States' consumption. The U.S. Fish and Wildlife Service has specific information about all of the wildlife and plant communities that currently thrive in the Arctic National Wildlife Refuge. Their input must be closely reviewed and included in the EIS analysis.

On the cultural side, the Gwich'in people of the northern reaches of Alaska and Canada depend on the wildlife of the coastal plains and northern tundra to continue their traditional subsistence living. No group of people should be forced to abandon their traditional way of life and have to live on a white man's diet and throw-away life style. There is a great deal of evidence and living proof how the collapse of native communities follows the loss of traditional lifestyles. In addition, the United States and Canada have entered in to a treaty in which both countries pledged to protect the habitat of the Porcupine Caribou Herd. Most of the 197,000 animals in this herd migrate to Canada for their winter range. There is only one place that provides the herd with the summer habitat that is required for the success of their calving and where they can safely reside during the summer months. This is on the coastal plain of the Arctic National Wildlife Refuge. This is the reason why this treaty was agreed upon because this habitat is so critical for the Porcupine herd's survival. Why would the United States want to risk the continued success of this herd, which is the only herd of caribou in North America which has not yet been affected by human development. All of this weighs the scales heavily for the "No Action" alternative of this EIS. Leave it as is. Allow the US Fish and Wildlife Service to continue the management and protection of this region.

If the BLM completes their EIS as required, the scientific research, facts, and information will no doubt reveal that oil and gas leasing is NOT the alternative that is appropriate for this area. It must be left as is to survive as the last remaining unspoiled area of Arctic coastal plain.

Regards,

Ken Robertson