



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] comment on scoping for EIS: Facts and details1 message

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To the BLM:

The Gwich'in People are Caribou People. They are entwined nutritionally, spiritually, and culturally. Eighty percent of Gwich'in peoples' diet is caribou. Their stories, their life ways, and the places they live are all shaped by the Porcupine Caribou Herd, including the herd's migratory patterns.

The Porcupine Caribou Herd generally winters within the Northwest Territories of Canada and migrates north to the coastal plain in Alaska in spring to birth and nurse their calves, then heads back south again—up to 3,000 miles annually.

Caribou cows with calves are particularly sensitive. They will move as much as a mile-and-a-half away from human disturbance. Within the relatively narrow sweep of coastal plain there is not much alternative space into which displaced cows could move their young.

These facts are especially relevant to a misleading claim made by Senator Murkowski and the whole Alaska congressional delegation. They insist that oil and gas mining will be environmentally "responsible" and limited to 2,000 acres. They want everyone to believe that only a very few acres will be impacted on the coastal plain, and that the calving grounds of the Porcupine Caribou herd won't be disturbed.

In fact, under the P.L. 115-97, the ground calculated in that 2,000-acre limit includes only airstrips and the area actually touched by piers holding up pipelines. That 2,000 acres does not take into account the amount of land that would be strapped under a sprawling network of pipelines and "temporary" roads. Seismic evidence suggests any coastal plain fossil hydrocarbons would not be in one big well (as in Prudhoe Bay), but are likely widely dispersed. Accessing them would, all the more, require a spidering network of infrastructure. Even before the roads, pipelines, and facilities got built, the industry would send in a fleet of fifty-six pound "thumper trucks" driven in grids spaced at $\leq 1/2$ mile to update seismic testing. Additionally, millions of gallons of water for drilling activities would be drained from Arctic rivers. The chemical brews required for drilling would become waste—likely toxic, though industry tends to keep these brews secret—injected under the permafrost, the same permafrost that is melting due to climate change from burning oil and gas. Of course, this is the very same permafrost that has been supporting the coastal plain soil and vegetation supporting caribou giving birth to their calves supporting Gwich'in People and culture for millennia. Finally, there is always the danger of a catastrophic oil spill in a fragile tundra ecosystem. All of these terrible possibilities are not at all far-fetched, and politicians' statements about how minimal the impact will be are really what is most far-fetched in this whole debate.

How could drilling in the coastal plain possibly be done "responsibly" given these multiple interconnected ecological and cultural realities, which the scoping process must fully take into account?

When will industry and government provide the public with clear details about the amount of land they plan to impact, where it will be, and how it will relate to the calving grounds inside Area 10-02?

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Will these issues and details be provided in a transparent manner? Or will they be held in secret, following the strategy of Senator Murkowski in sneaking P.L. 115-97 into the mammoth tax bill recently passed?

Will the professionals of the BLM hold the politicians to exacting, professional standards? Or will we see our public lands and community values ruined by fast-tracking, fast-talking, fast-and-loose politicians?

Sincerely,

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