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ALASKAN FRONTIER

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Bureau of Land Management
Coastal Plain Oil & Gas Leasing Program EIS
222 West 7th Ave, Stop #13
Anchorage, AK 99513

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June 1, 2018

Bureau of Land Management, Coastal Plain Oil and Gas Leasing Program EIS
222 West 7th Avenue, Stop #13
Anchorage, AK 99513

Dear Coastal Plain Oil and Gas Leasing Program,

I am writing to comment on the scoping process for the Environmental Impact Statement (EIS) for proposed oil and gas leasing in the Arctic National Wildlife Refuge. While I understand that this is just the scoping phase of a larger process, I am opposed to oil and gas development in any part of the Arctic Refuge. Oil and gas development is inconsistent and incompatible with the purpose for which the Arctic National Wildlife Range (later changed to Refuge in 1980 with ANILCA) was initially established in 1957, which was to protect an ecosystem. Counter to what Kara Moriarty of the Alaska Oil and Gas Association said in her comments at the Fairbanks public hearing on the EIS on May 29, when she included the potential for leasing that was added in 1980 as the purpose of the Refuge. This wording was added by then Senator Ted Stevens as a political move. It was never the intent of those who worked so hard to get the area originally protected, including biologists, Olaus and Mardy Murie, to allow oil development.

This current process used to initiate leasing has been underhanded. Inclusion of a rider in the Tax Cut and Jobs Act that Congress passed in December 2017 that mandates oil and gas leasing in the Refuge goes against everything that our democratic government stands for. The decision about use of public lands was taken out of the hands of the public and snuck into a tax bill when development in the Refuge has nothing to do with taxes. This was the ultimate in political gamesmanship by our Congressional delegation. Also, the mandate that an EIS has to be completed in one year circumvents the entire NEPA process, which is supposed to comprise a thorough and thoughtful investigation of all the possible impacts from a project. How can in-depth investigations be conducted and results analyzed within such a short timeframe? Basically, it feels like a set-up. Paying lip service to a public process where impacts will be fully assessed and those affected will have an opportunity to provide their views, while already having made a decision that leasing and development will move ahead. This was especially apparent at the Fairbanks hearing on May 29, when specific speakers were invited to testify and were given 5 minutes, many of whom were pro-development, while the general public - many of whom were opposed to development - had to sign up at the meeting and wait for hours and then only had 3 minutes to testify. A time cut-off for the hearing, then meant that everyone who wanted to testify were not even allowed to speak. This is not a fair process. All parties should be given equal time. It felt like the panel was already biased before the hearing even started.

The following are issues that I believe are important to be discussed in the EIS:

1. What are the impacts to the Porcupine Caribou Herd from the planned development? Years of research about caribou and development in the Prudhoe Bay and Kuparuk oil fields have shown that caribou and oil field infrastructure, roads, and gravel pads are not compatible. In order to thrive, caribou need direct access to the coast, which is a critical insect harassment relief area and to locations where there is a plentiful supply of high quality forage. Caribou

will not eat when being severely harassed by insects, so without access to relief areas, the caribou will starve and the population will decline. The same for access to forage. Without quality forage in the summer range, individual animals will not develop the strength necessary to get through the winter, especially females who need sufficient nutrients to support a pregnancy and birth. Newborn calves rely upon fresh green tundra vegetation to supplement their mother's milk so they can grow enough to be able to migrate in the fall. If the Porcupine Caribou are prevented from accessing the coastal plain where their best forage is, especially during the calving period, the population will decline. Research has shown that caribou are hesitant to cross roads and go over ramps above pipelines and thus are deflected from their normal travel routes.

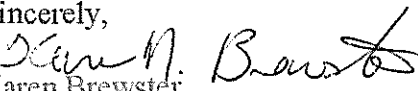
2. While some people point out that there are caribou in the vicinity of Prudhoe Bay, they fail to recognize that these are mostly male caribou. Very few females and calves are comfortable around the oil fields. In addition, each caribou herd is different and it is not possible to speculate how the Porcupine Herd will react just because individuals within the Central Arctic Herd behave a certain way. Research must be conducted on the Porcupine Herd specifically, and a one-year EIS does not allow for proper scientific studies of the full biological and behavioral impacts to the caribou.
3. What are the impacts to the Porcupine Caribou Herd from the planned development in their calving grounds? The coastal plain of the Arctic Refuge is critically important as the calving grounds for the Porcupine Caribou. Research has shown that displacement from calving grounds has a severe negative impact on a caribou population. Their calving grounds are selected based upon very specific conditions, such as timing of spring break-up and access to green vegetation, quality of forage, and freedom from predators. The Porcupine Caribou do not have anywhere else to go. Unlike Prudhoe Bay and Kuparuk where the coastal plain region is wider and so displaced caribou might be able to go elsewhere, this is not the case in the narrow coastal plain of the Refuge.
4. What are the impacts to other wildlife species from oil and gas development on the coastal plain? This area of the Refuge is prime nesting habitat for a variety of bird species and how will their displacement affect the overall populations. What about polar bears, wolves and Arctic foxes, which are the other primary wildlife species using the area? It is well documented that with climate change and receding sea ice, polar bears are spending more time on land, especially for denning, and there are known den sites along the coastal plain of the refuge. What happens if they are restricted from using these good denning sites?
5. What are the cultural impacts from oil and gas development? The Gwich'in people of Alaska and Canada are highly dependent on caribou from the Porcupine Herd to sustain their communities. In their remote communities where there are few jobs, food and energy prices are high, and poverty is rampant, living off the land the way their ancestors did is essential for their continued survival. Caribou is a primary food source that allows them to continue to live according to their traditions. The Gwich'in people emphasize how important caribou are to their livelihood and their cultural survival. It is a sacred animal to them and the birthing grounds of the coastal plain is particularly hallowed ground since this is where the caribou go every year to replenish. Without this safe area, decline in the caribou population threatens the future survival of a critically important group of Alaska Natives. It is vital that traditional knowledge be considered in the EIS process and that the Gwich'in and Inupiat people of both Alaska and Canada be fully consulted and involved in this decision making. They are the ones who will be most affected by any oil and gas leasing, since access to Refuge land to

continue their traditional hunting and fishing practices is essential. More research should be done to document the vast traditional knowledge of the local Native people and to demonstrate how important the wildlife in the coastal plain are to them.

6. What are the cumulative social, economic and biological impacts from oil and gas development on the North Slope that development of another area will contribute to? The Arctic Refuge is the last remaining truly wild portion of the North Slope. There is plenty of development in other areas, so it is critical that one piece remains pristine. There have been plenty of impacts on local communities, caribou populations, and traditional cultural practices with the development of Prudhoe and Kuparuk, so what does it mean for the region if yet another place is developed? The Arctic Refuge should be left alone so there remains one last intact North Slope ecosystem.
7. How does oil and gas leasing fit within the mission of the international agreement signed between the United States and Canada to protect the Porcupine Caribou Herd that moves back and forth across the border depending on the season? It seems that oil and gas leasing on the coastal plain that will impact the herd's calving area violates the agreement in that it is doing the complete opposite of protection of the herd. It is moving towards destroying the herd, not conserving it for future generations.
8. How will public access be handled? Currently, the public is prohibited from accessing Prudhoe Bay and Kuparuk oil fields. However, the Arctic Refuge is a popular recreation area used by people rafting the rivers, backpacking, or fishing and hunting. As a public recreation area, how can development be allowed in a place where the public would not be able to access and utilize what are their public lands? While a wildlife refuge allows for multi-use, oil development and public recreation are mutually exclusive.
9. What would be the impacts on recreation in the Arctic Refuge if the coastal plain is developed? Would the rivers that are so important for rafting continue to flow and could groups still get out to the coast and to Kaktovik for their return flights home? How would hunting in the Refuge be affected?

The Arctic Refuge is the only part of the Alaskan Arctic that is in protected status, and that should not be compromised. Having lived on the North Slope for eight years, I am intimately familiar with the beauty and fragility of this ecosystem. The northern tundra is easily damaged; you can still see scars made by Weasels traversing it during the early days of oil exploration in the 1940s. I would hate to see more of this, especially in a national wildlife refuge. The Arctic National Wildlife Refuge was specifically set aside to protect a far-reaching and integrated ecosystem, including the coast, the river systems, the foothills, the lakes, and all the fish and wildlife that inhabit or migrate through the region. This purpose should not be changed. This effort to open the Arctic Refuge for leasing and doing an EIS has been deceptive and is a misuse of government funds. The best outcome would be for recommendation of no oil and gas leasing *due to the obvious negative impacts from such activities and the clear incompatibility of development with conservation of wildlife and protection of traditional Native ways of life.*

Sincerely,


Karen Brewster

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