

## Arctic National Wildlife Refuge Leasing EIS Comments-Public Hrg.

This misbegotten proposal is the epitome of sausage being made. Knowing that drilling in the Refuge is not supported by its owners, the American public and by a significant # of Alaskans, Sen. Murk. sold her Tax Bill vote to Mc Con. to get drilling backdoored into an unrelated bill. She sold out her Native American constituents, who are largely responsible for her currently holding office. As a consequence, you owe the public a very rigorous, objective and complete analysis of the inevitable, very consequential environmental and social impacts of this ill-advised action.

The analysis must encompass the entirety of the Porcupine Caribou Herd (PCH) range, to include the native corporation lands that will be developed within the refuge and the Canadian portion of the range.

The 1002 area prime development target coincides with the area that produces the most nutritious forage sought by caribou cows for calving, to support their increased nutritional needs. This limited area is key out of the 19 million acre refuge.

The 2000 acre development footprint is meaningless pap put out to obfuscate the facts. Linear features affect a much larger area than they occupy. Roads and pipelines affect the habitat for a significant distance beyond their footprint.

With global warming, ice roads and pads are increasingly less useful and pressure will grow to put in permanent roads and/or accept more tundra damage.

Fairbanks  
5/29/18

You will need a several hundred page EIS and far more than the one year DOI time goal to adequately identify and analyze the impacts.

With only 3 minutes, ~~disruptions and force conversion from subsistence~~ and I will only give bullets of what should be covered in the analysis, since it would be impossible to even give an abstract of what is available documenting predictable impacts.

- Effects on US and Canadian Gwichin/Inupiat social and economic structures when declining caribou cause conversion from subsistence to cash economies.

- Effect on polar bears as warming forces more of them to become shore-dependent. Effect of development on their #s.

- Cannot legitimately use Prudhoe Bay caribou as an analogue for the Refuge. There are too many significant environmental differences.

- Canadian study found caribou spent less time than expected in areas as much as 14 km from diamond mines.

- USGS study found caribou shifted from well concentrations for calving. Researcher, Johnson found that even after decades of oil development in the Canadian portion of its range, they were still avoiding areas within 6 km of roads and wells.

- A UMASS environmental document based on research papers noted that "...recovering this oil would inevitably involve mass, irreversible, ecological damage to the ecosystems within the area..." (Impacts of drilling in the ANWR, Dec. 3, 2015 Debating Science).

- \_Woodland caribou were disturbed in a 1000 meter distance from wells, 250 meters from seismic lines.

- A total of 303,000 acres of calving habitat would be affected. This equals 37% of the calving habitat resulting in an 8.2% reduction in calf

survival. (Griffith, et al, 2002)- if survival rates drop more than 4.6%, herd <sup>growth</sup> would drop which could lead to its extinction. This would be caused by only 27 km of displacement. Griffith's model showed average displacement from infrastructure of about 52 km. Presently, when deep snow occasionally drives calving out of the 1002 area and into the foothills, success drops 19%.

-Insect relief areas will be affected by development.

-Analysis should also include the remaining impacts of D&D after the life of the projects. There is no dedicated D&D funding or bonding in place for Prudhoe Bay, Kuparuk, etc. so it should be assumed that little or no D&D will occur in the 1002 area as well.

Finally, this administration shows little inclination to restrict industry and thus implement effective mitigation measures, therefore the analysis must focus on worst case scenarios.

I have no doubt that the BLM is capable of producing a rigorous and honest EIS, but have considerable doubt about what the Administrations "minders" will ultimately issue. We will be watching carefully!

The "Responsible development" mantra rings hollow.