



CoastalPlain\_EIS, BLM\_AK &lt;blm\_ak\_coastalplain\_eis@blm.gov&gt;

## [EXTERNAL] Scoping Comments on Coastal Plain oil and gas leasing, Arctic National Wildlife Refuge

1 message

Natalie Dawson &lt;natstracks@gmail.com&gt;

Tue, Jun 19, 2018 at 9:25 AM

To: blm\_ak\_coastalplain\_EIS@blm.gov

To: BLM

From: Dr. Natalie Dawson

Re: Scoping Comments, EIS process for oil and gas leasing and drilling on the Coastal Plain, Arctic National Wildlife Refuge.

I appreciate the opportunity to provide public comment during the scoping period for the Coastal Oil and Gas Leasing EIS to be completed by BLM pursuant to the Tax Act (Pub. L. 115-97, Dec. 22, 2017) on the Coastal Plain of the Arctic National Wildlife Refuge (Area 1002, to be referred herein as the "Coastal Plain"). Given this law was written in haste, and the impacts of the leasing program outlined in the law will impact the largest national wildlife refuge in the U.S., iconic species of the Arctic such as polar bears, musk oxen, and barren ground caribou, and will severely impact the only protected coastline region of the U.S. arctic, I am requesting that the BLM prepares a thorough and publically vetted EIS through a completely transparent NEPA process. The EIS should focus on the myriad of impacts that any oil and gas leasing activities will have on the lands and waters of the region, including long-term, cumulative impacts that will be felt across the entire Coastal Plain, not just within the leased areas. The BLM must consider ALL alternatives, including alternatives that are "no action" and also those that provide "no leasing alternative" due to the NEPA process. I look forward to seeing these alternatives included in the draft EIS, and providing additional comment throughout the process.

Leasing activities will require some ground survey efforts that will impact this currently pristine landscape. Therefore, it is not enough to say that these environmental impacts will be addressed in future evaluations and NEPA processes. Oil and gas leasing, as a singular activity is enough to require a thorough EIS.

The tentative schedule put forward in the scoping documents should better reflect the actual time it will take to carry out a thorough EIS prior to any leasing activity. It should be acknowledged in the EIS process that longer times should be expected for oil and gas leasing activities in a previously undisturbed, pristine landscape such as the Arctic National Wildlife Refuge Coastal Plain.

I would like to request that the North Slope Borough, who will have direct economic conflicts of interest with proposed oil and gas leasing and activities, since they receive funding from the Arctic Slope Regional Corporation, be removed from the consulting agencies list, and not be consulted in this process, as they will not be able to provide unbiased consultations due to their economic interests in the Coastal Plain oil and gas leasing activities.

The Arctic National Wildlife Refuge, including the Coastal Plain, was first established in 1960. It was amended in 1980 and became the largest national wildlife refuge in the United States with the most wilderness acreage of any national wildlife refuge in the country. Originally established "For the purpose of preserving unique wildlife, wilderness and recreational values..." (Public Land Order 2214, Section 1), the additions in 1980 were included "(i) to conserve fish and wildlife populations and habitats in their natural diversity including, but not limited to, the Porcupine caribou herd (including participation in coordinated ecological studies and management of this herd and the Western Arctic caribou herd), polar bears, grizzly bears muskox, Dall sheep, wolves,

wolverines, snow geese, peregrine falcons and other migratory birds and Arctic char and grayling;  
 (ii) to fulfill the international treaty obligations of the United States with respect to fish and wildlife and their habitats;  
 (iii) to provide, in a manner consistent with the purposes set forth in subparagraphs (i) and (ii), the opportunity for continued subsistence uses by local residents, and  
 (iv) to ensure, to the maximum extent practicable and in a manner consistent with the purposes set forth in paragraph (i), water quality and necessary water quantity within the refuge.”

The mission of the US National Wildlife Refuge System, of which the Coastal Plain is an integral part, is “*To administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans.*” The Coastal Plain represents the only intact arctic coastal ecoregion within the entire refuge system. Therefore, this mission statement applies directly to the Coastal Plain terrestrial and aquatic environments.

The Coastal Plain is “the most biological productive part of the [Arctic] refuge and contains important habitat for a great diversity and abundance of life.” [1] Earlier studies into the viability of oil and gas development on the Coastal Plain resulted in the conclusions, “The 1002 Area [Coastal Plain] is the most biologically productive part of the Arctic Refuge for wildlife and is the center of wildlife activity.” [2] It is the only protected coastline in northern Alaska, home to threatened wildlife species, migratory birds, and internationally significant wildlife migrations. Encompassing these characteristics, and the rich history from which the refuge was originally protected, it will also be important to foresee additional impacts caused by resource extraction in the face of climate change, which is currently reshaping northern Alaska and its impacts extend into the Coastal Plain.

The Coastal Plain was also established for recreational opportunities, and as someone who regularly visited the Coastal Plain and the Arctic National Wildlife Refuge, I request that BLM secures, during its formal scoping and review, continued public access throughout the entirety of the Coastal Plain, even in lieu of oil and gas leasing and development. Currently, much of the NPR-A lands are off limits where oil and gas leasing occur, and it has had a detrimental impact on recreation in those areas. Please make sure that the Coastal Plain does not follow the same fate as the NPR-A.

I am also requesting the BLM follow the procedural guidelines in the 2003 National Research Council report “Cumulative Impacts of Oil and Gas Activities on Alaska’s North Slope” to make sure the same mistakes that have been made in the NPR-A, are not made on the Coastal Plain if leasing and development activities should take place. For example, specific research needs are outlined in this report that should be followed in advance, during and after any oil and gas leasing and activities on the Coastal Plain.

I would also like to request specific protections for the following rivers: the Hulahula, Jago, Okpilak, Canning, Kongakut. These rivers, all wild and four of them with characteristics to make them eligible for designation under the Wild and Scenic Rivers Act (celebrating its 50<sup>th</sup> anniversary in 2018) should be protected for their outstanding remarkable values as outlined in the National Wild and Scenic Rivers Act. Specific protections should include at least a 100 meter buffer on either side of the rivers, including protections for the estuary habitat at the river deltas on the Coastal Plain, proven areas of incredible productivity due to nesting birds, calving caribou, and other species that use the region throughout the spring, summer and fall. Saddlerochit Springs should be protected, with at least a 2,000 acre buffer. Also, all riparian areas, lakes, and ponds should be adequately protected from development. Resource extraction activities and leasing should not be able to use the limited water resources for development, and instead, should focus on minimally-intrusive desalination techniques that will not harm the terrestrial or nearshore marine environments.

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The Arctic National Wildlife Refuge and the Coastal Plain in particular, have been the center of decades’ long controversy over oil and gas development and preservation of intact ecosystems. I would like to request the BLM initiates a new EIS process that does not rely on conditions and reports from earlier studies that culminated in the 1987 FLEIS for the Coastal Plain. Conditions on the North Slope of Alaska in the Arctic have changed considerably since the FLEIS was completed in 1987. The climate has been warming, particularly during the winter months [3], when most oil and gas leasing activity will occur. This has also caused changes to the Porcupine Caribou herd that include alternative migration patterns in years of deep snow, stress on pregnant cows, and changes to their foraging habitats on the Coastal Plain. The warming trend usually results in earlier greening of vegetation in the spring and later die-back of vegetation in the fall (exceptional years being 2000 and 2001). Native Alaskans of regional villages claim unpredictable weather patterns and more dangerous snow and ice conditions as examples of changing climates in the Arctic. [4]

The Interior Secretary's 1987 Recommendation to Congress called for full leasing and development of the Coastal Plain in contradiction to the scientific findings of the "1002 Report"/ FLEIS. The Department of the Interior had predicted that oil and gas development across the Coastal Plain will result in **significant** adverse impacts to caribou and muskox, water quantity and quality, subsistence hunting and fishing, wilderness, and recreation and significant effects to snow geese, wolves, wolverines, brown bear, polar bears, vegetation, and permafrost terrain. The research agencies and independent scientists across the Arctic have updated information to support these earlier BLM FLEIS conclusions, that are new since 1987, and therefore, the BLM should research, review, and write a new EIS that incorporates this updated information.

I would like to note that news information sources, as well as Congressional Research Service Reports (e.g. Corn 2003) have indicated that oil and gas leasing and drilling may produce oil and gas that could be shipped overseas instead of utilized within the U.S. markets. I would like to request that BLM make sure to provide clear, concise review of the economic impacts, both positive and negative, if oil and gas leasing and drilling were to occur in the Coastal Plain. This should include an alternative that would demand domestic use of these products if they go to market.

The Coastal Plain of the Arctic National Refuge is the final stretch of arctic coastline in US ownership that remains undeveloped, pristine, and under the influence of natural processes. It is a dynamic place, undergoing climatic shifts, home to the largest wildlife migrations in the world, and represents the heart of cultural heritage for Indigenous Gwich'in Athabascan people who span two countries. In relinquishing the integrity of this wild landscape in the name of oil and gas development, as part of a budget reconciliation that inaccurately projects the economic uncertainty of natural resource development, we are relinquishing the most profoundly wild landscape in the U.S. A series of political actions have opened the Coastal Plain to oil and gas leasing and development, and we are requesting that great care be taken in allowing these activities to go forward only after a thorough environmental review that is not impacted by these same political forces. We are requesting a thorough EIS that includes public participation, peer-reviewed science, and consultation with all entities that may be impacted by the proposed actions. The EIS needs to discuss the fact that opening the Coastal Plain to oil and gas leasing and development will do irreparable harm and some actions will not be able to be mitigated. Species may go extinct, industrial activity will contribute to global warming in an already sensitive landscape, livelihoods may be lost for people who rely on the wild, intact Coastal Plain for recreationally-based businesses, and cultural heritage will be jeopardized as the Coastal Plain's integrity is lost to development. We request that the EIS incorporates the earlier knowledge from earlier EIS documents that concludes harm will be done to the environment. *"Oil and gas development would result in long-term changes in the wilderness environment, wildlife habitats, and Native community activities currently existing, resulting instead in an area governed by industrial activities."*<sup>[5]</sup> *"The wilderness character of the coastal plain would be irretrievably lost."*<sup>[6]</sup>

I would also like to stress that oil and gas leasing and drilling in the Arctic was not voted on by the public, even though the Coastal Plain is made up of public lands, aside from the small native Alaskan community lands near Kaktovik and inholdings. I do not agree with giving these public lands as a gift to Alaska to make money for little return to the federal government. Because these are public lands, and lands that were not voted on by the public to open for oil and gas leasing and drilling, I am requesting that the BLM do a THOROUGH EIS, which includes review, consultations, research requests, economic studies, cultural studies, and resource reviews that are NOT intended to move this through quickly. I understand the pressure the agency is under to fulfill the requests of Secretary Zinke and Congressional members Don Young and Lisa Murkowski, as well as the Arctic Slope Regional Corporation and Kaktovik village corporation that will assume most of the wealth from these actions. However, the agency must uphold its responsibilities under NEPA, and those responsibilities require thorough analysis, and if determined to be environmentally catastrophic to this pristine landscape, the agency has the responsibility to deny the oil and gas leasing and development program through a "no leasing alternative" in NEPA. These are incomprehensible changes to a landscape that remains a singular representation of the wild, arctic Alaska coastline, and it is owned by the U.S. and all of its citizens, not only Alaskans, not Native corporations, and not congressional members of specific state delegations. I hope this letter clearly outlines my request for a thorough EIS, for protection of the integrity of the Coastal Plain of the Arctic National Wildlife Refuge, for special protections for particular parts of the Coastal Plain, and thorough economic analyses that indicate these oil and gas resources, should they be extracted, will not be allowed to be shipped overseas, but must become part of our domestic supply. I appreciate that you will consider these suggestions when constructing your EIS and subsequent planning documents.

I do not support any oil and gas leasing, development or other activities in the Coastal Plain, as it does not correspond for the original intent of protecting this landscape, and the very reason why Olaus and Mardie Murie originally established the Arctic National Wildlife Range. However, if BLM is going to pursue oil and gas leasing pursuant to the tax law provision, I am requesting a thorough EIS, before any such activities commence.

Sincerely,

Dr. Natalie Dawson

Wilderness educator

Wildlife Biologist, Alaska-based consultant

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- [1] Arctic Refuge Draft Revised Comprehensive Conservation Plan. P H-11.
- [2] U.S. Department of the Interior (USDOI). April 1987. Arctic National Wildlife Refuge, Alaska, Coastal Plain Resource Assessment. Report and Recommendation to the Congress of the United States and Final Legislative Environmental Impact Statement.
- [3] U.S. Department of the Interior. Geological Survey. Arctic Refuge Coastal Plain Terrestrial Wildlife Research Summaries. 2002. USGS/BRD/BSR-2002-001.P.11.
- [4] Brown, DeNeen L. Signs of Thaw in a Desert of Snow. Washington Post. May 28, 2002. P. A1
- [5] U.S. Department of the Interior (USDOI). April 1987. Arctic National Wildlife Refuge, Alaska, Coastal Plain Resource Assessment. Report and Recommendation to the Congress of the United States and Final Legislative Environmental Impact Statement.
- [6] U.S. Department of the Interior (USDOI). April 1987. Arctic National Wildlife Refuge, Alaska, Coastal Plain Resource Assessment. Report and Recommendation to the Congress of the United States and Final Legislative Environmental Impact Statement.