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[EXTERNAL] Coastal Plain Oil and Gas Leasing Program EIS: Consider Impacts from Extant Oil Infrastructure + Unique Sensitive Environment of Coastal Plain

1 message

Cherissa Dukelow <cherissa@localpost.io>
To: blm_ak_coastalplain_EIS@blm.gov

Tue, Jun 19, 2018 at 8:12 PM

Dear Ms. Hayes:

Those performing the required Environmental Impact Statement in order to implement an oil and gas leasing program within the Arctic National Wildlife Refuge Coastal Plain should consider the precious inherent value of this land, the ecological and cultural impacts that would be associated with even the smallest disturbance - let alone drilling for oil, the present and historic environmental impacts (pollution of air and water, disturbance to fish and wildlife, alteration of ecosystems, degradation of aesthetic, contribution to greenhouse gases) of the extant oil and gas infrastructure on the North Slope and related infrastructure in the arctic, i.e. the Trans-Alaska Pipeline System, and juxtapose these facilities and activities with the unique, sensitive nature of the arctic tundra landscape referred to by Section 1002.

The arctic is a particularly vulnerable ecosystem because of its slow-growing plant species, long-living wildlife, and its potential for dramatic changes from the melting of snow, glacier, and permafrost. Adding the stresses of intensive oil and gas development would exacerbate impacts from climate change and contribute irreversible damage to the landscape, water resources, plant and animal life, and native human cultures that depend on these sensitive organisms for survival.

Oil drilling and refining are land, water, and air intensive processes. Toxic air emissions and spills are inevitable, and especially difficult to mitigate and remediate in the fragile vegetation and perpetually frozen earth. What plans will be put into place to deal with this?

Inevitably, in addition to the areas destroyed by oil drilling and processing, oil development in the ANWR will require roads, pipelines, airports, and other facilities in order to transport products and workers. Will this development be restricted in any way? What disturbances will this lead to? What effects have been observed at Prudhoe Bay, and how would impacts be similar or different in the prime and singular habitat areas in the ANWR?

The scope of the EIS should include consideration that the impact of oil and gas development will continue to expand and become evermore intensive (as long as it is allowed to) as resources dwindle and become more difficult to access and extract.

Many effects of climate change have been observed, studied, and well-documented in the arctic. In addition to increased heat and air pollutant emissions from facility and supporting vehicle operations, methane and other gases released from increased melting of surrounding permafrost would aggravate climate change as well. Simply removing vegetation from the ground surface melts permafrost significantly by removing insulation. The impacts of melting and thermokarst caused by oil drilling and related infrastructure often ultimately have a much wider impact than would be expected. A full analysis of the short-term and long-term contributions to climate change should be completed.

Most notoriously, the 1002 area encompasses crucial Porcupine Caribou herd calving grounds. These creatures travel great distances, enduring intense weather, insect, and parasite conditions to return to this location to breed. Studies have shown that they avoid industrial infrastructure and that it impacts their movements. Aside from their intrinsic value as a species, the Gwich'in and other native cultures rely on the caribou for subsistence. Should the herd's movement and population be impacted negatively from oil and gas development in this sensitive region, this would put a hardship on these peoples, adding yet another mark on the list of damages the US has dealt to native peoples across North America. This impact has been described by Gwich'in people as genocide. Alaska Native peoples in villages across the state have been psychologically damaged by the course of Western culture colonizing Alaska and interfering with their ways of life time and time again. Damaging the important breeding grounds of caribou, that the Gwich'in people rely on both for subsistence, spiritual, and cultural reasons is an act of violence that is unacceptable. Anthropological studies analyzing the numerous impacts to these people should be included in the EIS in addition to ecological impacts. Native community leaders and native studies academics should be consulted.

In addition to caribou, this area is an important refuge for many species of migrating birds, the endangered polar bear, and countless other organisms, which will also need to be considered in the EIS.

I am in favor of a ****NO ACTION alternative****. It was a grand, historic, patriotic action to pass legislation to designate the northeast corner of Alaska to be the Arctic National Wildlife Refuge, and we should be proud to uphold these decisions and allow the refuge to remain preserved. It is a great sorrow that this historic accomplishment could be so casually undermined. The BLM could instead focus on improving existing outdated petroleum infrastructure (TAPS) to fortify leak prevention, etc. The coastal plain's value lies in its ancient, pristine aesthetic, potential for scientific research, recreation, and subsistence, not development. Allowing oil drilling and other development would damage these values permanently. This land is a special asset unique to the state of Alaska, and we should be proud to protect it.

In addition, the rate at which this decision and process are happening is alarming, and I am concerned that the thoroughness required to execute necessary care in analyzing the full range of environmental and cultural impacts is greatly insufficient. Since this area is so special, input must be solicited by a spectrum of expert and non-expert opinions about the impacts. Both scientific and traditional tribal knowledge should be consulted.

Thank you for considering my comments, and for your efforts in making the best decisions with this proposal. I am a seasonal field ecologist studying long term ecology of streams in Alaska, currently residing in Fairbanks.

Sincerely,

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