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[EXTERNAL] J Fair scoping comments for 1002 drilling

1 message

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Scoping Comments for Area 1002 Coastal Plain Oil and Gas Drilling EIS

from Jeff Fair, Palmer, AK June 19th, 2018

Thank you to the BLM for this opportunity, however required.

I'd like to begin by introducing myself as a 25-year Alaskan and 65-year American with a stake in the Arctic Refuge and the 1002 in particular. I am a freelance wildlife biologist and outdoor/wildlife writer who has worked many stints in Alaska's Arctic, both east and west, making over 24 working trips to our Arctic, and also visiting drilling centers Prudhoe and west primarily to speak at Health, Safety, and Environment meetings to the crews there. I worked for approximately one month in the 1002 doing bird studies with the USFWS, and visited parts of the Refuge on a few other occasions.

As a writer, I've written about the Refuge in *Arctic Wings*, about the NPR-A in *On Arctic Ground*, both anthologies. I've also written about the Alaskan Arctic in *Audubon magazine* (loons in the Arctic, caribou in the Arctic, conservation on federal lands in the Arctic, etc.) and in *Alaska magazine*, among other markets. As a professional, I have written comments on some pretty shaky EISs, and on some very good ones. I hope that the BLM and the American people will help make this one of the latter.

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1. I have to begin with this: The idea that this project will only affect 2,000 surface acres in the 1002 is as ludicrous as the promise of only 13 flights per day into Alpine. To begin, the new geo-exploration will criss-cross most of the 1002, scarring the tundra and affecting regrowth just like its former cousin left marks all over the NPR-A. Performed at the wrong season, it will affect polar bear denning/reproduction. I'm sure many of my colleagues will suggest details formally.

In addition, for a proper environmental evaluation BLM must add to the 2,000-acre disturbance the dust from the roads, landing pads and airstrips unplanned to date, all of the pads not yet planned, etc. These and traffic—human, vehicular, air—will have effects on the human and wildlife experience there.

Beyond that, an EIS in a Wilderness Area must assess the effects of sound and visibility on both human experience and wildlife existence there and as far as these effects reach. This must include the effects of lowered value on the human wilderness experience from as far away as they can and will be seen.

2. Well, I guess that was more than one point, but I wished to point out those necessary values that will be diminished, as they are related.

This idea of rushing the NEPA process is wrong-headed for the 1002. If anything, here we have the apotheosis of tender and ticklish environmental/wilderness issues, which will require more time, not less. This is a very complex question, beyond just that of environment in the physical sense, and rushing it would be akin to separation of families at the Mexican border. We cannot afford, as Americans, to give up this final wilderness and pre-eminent wilderness experience with a rush-through evaluation for a few politicians and oil companies.

3. I'm certain that you'll hear about wilderness and wildlife issues for this EIS. I'd like to suggest that a study of similar dispositions of values of indigenous Peoples by federal allowance of industrial development vs. how a decimation or rerouting of the Porcupine Caribou Herd would affect the Gwich'in People of both Alaska and Canada would affect them. The Porcupine Caribou are not only food, but communion with the Earth to them. What are the honest odds that this 1002 development will not affect the herd and their natural food? The is important in both a survival and a religious sense.

4. Insofar as everything today is valued in dollar and fiscal importance over everything else (a nasty mistake), what about the values of loss due to climate change by the burning of these fossil fuels from the 1002? How soon will they really add

to the American GNP and *how much might we forecast that they cost us later with additional climate change (warming), sea-level increase, etc.?*

This seems to me like a political show-down, and not a necessary argument. Can an EIS reach into that arena? Is this really needed, this development, this future oil? Or is it better and more profitably left in the ground for now. Shouldn't an EIS look into that?

5. All of my questions actually make America great again by looking into the actual values of this closed-door behind-the-back "decision" (which it was NOT) to drill the Refuge, and I think shooting it down according to long-term finance, conservation, moral, and religion. That = Patriotism.

Do we love our Land? Or sell it to developmental industry for short-term gain? That should be covered in a 21st Century EIS.

The Arctic National Wildlife Refuge, as a whole, and especially with the Canadian protected land immediately next to it, remains the last of a completely protected North American ecosystems, and the only Arctic ecosystems the US has protected. The 1002 is recognized as the last 5% of America's coastal plan under full protection, until now. It belongs to the American people—all of us—and not to the politicians or oil companies who buy out the politicians. Is there any room in an EIS for that fact?

6. In conclusion (if there ever is one), let the EIS enumerate the values of biodiversity threatened (including among others the very live of polar bears), the Wilderness values as part of the Refuge and the Refuge itself as a wild full ecosystem, the value of this area as we as a nation and an American people scientifically monitor the effects of climate warming, and perhaps most poignantly, how we allow the Gwich'in to survive and continue with their local economy and brotherhood with the Porcupine Caribou Herd, along with our neighbor and ally, Canada.

Yours, sincerely,

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