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[EXTERNAL] Comment on the Draft Environmental Impact Statement for the Arctic National Wildlife Refuge

1 message

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To: blm_ak_coastalplain_eis@blm.gov

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Ms. Nicole Hayes,

I've spent six summers exploring the Arctic National Wildlife Refuge. I've seen with my own eyes how skittish young calves and their mothers are. If backpackers need to walk on eggshells around caribou on the calving grounds, the idea that networks or roads, pipelines, airstrips, drill pads and processing facilities wouldn't have tremendous impacts on the Porcupine caribou herd is ridiculous.

The Draft Environmental Impact Statement utterly fails to address the impacts of oil and gas leasing in the Arctic National Wildlife Refuge, especially transboundary impacts. The DEIS understates the importance of the Coastal Plain to the Porcupine caribou herd, based on a designation of 'primary calving areas' (see page 2-13), that arbitrarily excludes areas used less than 40% of years. The DEIS fails to address the importance of the Coastal Plain as post-calving habitat. The DEIS suggests that drilling would not cause the Porcupine caribou to decline, but does not support this claim with any modelling or quantitative analysis. The absence of quantitative analysis of impacts on the Porcupine caribou herd, and the failure of the BLM to envision a scenario where the herd falls into decline is one of the most egregious oversights of the DEIS.

The DEIS is also severely lacking in its analysis of subsistence impacts. The review fails to acknowledge Gwich'in in Canada when determining what communities could be "appreciably affected" by changes to population patterns in the Porcupine caribou herd (see page E-3). 85% of Porcupine caribou harvest occurs in Canada, and therefore Gwich'in communities in Canada would be seriously impacted by activities detrimental to the health of the Porcupine caribou herd. The DEIS must undertake a thorough analysis of the subsistence impacts on Indigenous communities within Canada, and fully address the cultural, social and economic concerns facing Indigenous communities that have been brought to your agency's attention during the scoping period and this current comment period.

The DEIS utterly fails in its assessment of cumulative impacts. Cumulative impacts are not defined by species: for instance the Porcupine caribou herd is lumped in with all other terrestrial mammals and all bird species are amalgamated. The terrestrial mammal cumulative impact section is a mere five sentences long. According to the CEQ, cumulative effects are "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions" (40 CFR ~ 1508.7). Cumulative effects sections in the DEIS are limited to a cursory identification of some factors which may constitute cumulative effects. Nowhere does the DEIS provide quantitative assessments of how cumulative effects may impact species, ecosystems, communities or the climate.

The DEIS's section on birds is inadequate. For instance, the DEIS claims that potential marine oil spills would not be toxic to birds, but fails to provide a citation. The DEIS also claims that the risk of major oil spills is low, but cites data on historical oil spills around Kaktovik, rather than an area that has experienced the types of oil development foreseen for the Coastal Plain (see Table I-4). The DEIS makes unreliable assumptions on the zone of influence for oil infrastructure on birds, and ignores data that songbird nests may experience declined survival rates as far as 5 km from certain types of North Slope oil infrastructure. The DEIS bird sections also contains sloppy errors (showing the lack of attention paid to its preparation, such as the misspelling of species names: "red-neck phalarope," "gyrfaon" and "peregrine faon."

The DEIS also neglects to provide citations for many of the claims it makes, making it difficult for the public to verify the information the DEIS relies upon. This is another example of the cursory work that went in to drafting the DEIS. For example, the DEIS claims without citation that:

- That Arctic sea ice cover reached a maximum in 1977 due to the Pacific Decadal Oscillation (page 79).
- That the global biosphere is gaining mass due to rising carbon dioxide emissions (page 74).
- That some birds could benefit under climate change from an expansion of coastal habitats (page 3-91).
- That oil spills on the tundra or in water are extremely rare, as are spills exceeding 10,000 gallons (page 3-99).
- That potential marine oil spills would not be toxic to birds (page 3-99).
- That timing limitations effectively mitigate the majority of impacts to caribou (Appendix E, page E-8).

The DEIS completely fails to give decision makers and the public an accurate portrayal of the impacts of oil and gas leasing on the Coastal Plain. The U.S. Government redo its DEIS, and fully address the consequences of drilling on the Porcupine caribou herd and impacts to the livelihood of the Gwich'in who rely on the herd. The BLM must adequately address cumulative impacts, impacts on birds and other wildlife and the transboundary impacts that Canada would experience.

Thank you,

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