
From: Hayes, Miriam (Nicole) <mnhayes@blm.gov>
Sent: Tuesday, February 19, 2019 7:56 AM
To: coastalplainAR; Sean Cottle
Subject: Fwd: [EXTERNAL] Coastal Plain Oil and Gas Leasing Program EIS Comments

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Nicole Hayes

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From: Ronald Yarnell <ronaldyarnell@icloud.com>
Date: Sun, Feb 17, 2019 at 10:29 PM
Subject: [EXTERNAL] Coastal Plain Oil and Gas Leasing Program EIS Comments
To: <mnhayes@blm.gov>

Dear Nicole Hayes,

I would like the following comments included in consideration of the proposed EIS for Oil & Gas leasing within the 1002 area on the coastal plain of the Arctic National Wildlife Refuge.

My name is Ron Yarnell. I have been leading wilderness trips across the coastal plain of the Arctic Refuge since 1976. Over these decades I have led hundreds of people from all over the world, out of the mountains, across the coastal plain, all the way to the Arctic Ocean. I have done this commercially for all these decades. These trips have consisted of backpacks, base camps, birding trips, kayak trips, rafting trips, & fishing trips. Over these decades I have employed dozens of guides that have worked for me on the coastal plain.

These trips have been over half my business. It is safe to say, that in my over 40 year career, the coastal plain of the Arctic Refuge has brought in more than half of my livelihood. I see nothing in the draft EIS that states the impacts oil & gas leasing will have on mine or other outfitter's businesses. No mention is made of how many permittees will be impacted. No mention is made about how many visitors days of use will be impacted. No mention is made how much income from all these outfitters, guides, hunting guides, and other permittees will be reduced.

The figures on page 3-203, certainly do not present any kind of economic impact. I seriously question whether these figures are anywhere close to the actual number of visitors. They certainly do not ascertain the actual number of visitor days of use in the 1002 area & it's economic value. As permittees we actually have to pay a per user day fee. Certainly these records are available at the US Fish & Wildlife Refuge office in Fairbanks. From them it would be simple enough to figure this out.

The average client spends over \$4000 per trip. In addition to this they spend approximately \$2000 more, per client, in state, on lodging, other transportation, food & additional expenses. This does not include the cost of air transportation just to get to Alaska, for those clients not from Alaska. These figures need to be incorporated into the EIS. What is the economic costs to permitted outfitters & guides from the loss of business leading trips across the coastal plain?

Additionally unguided visitors (those going on their own trips) spend at least \$2000 per trip. Often times these are residents, but not always. In addition to these expenses, I would estimate another \$1000 in expenses for unguided visitors. Once again these figures do not include air transport to Alaska for those folks that do not live in the state.

I see nowhere in the draft EIS that states the economic impacts oil leasing & development will have on recreational activity in Kaktovik, Arctic Village, Fairbanks, Anchorage & Alaska in general. What loss of income & job opportunities will be foregone to wilderness guides, bed & breakfast, hunting guides, air taxi operators, hotels in Alaska communities, etc.

A full economic analysis needs to be done to determine the economic effects of oil & gas leasing & development upon these businesses. Additionally a full economic analysis need to be done to determine the total economic impact full development will have on all users. People spend a lot of money to visit the Arctic Refuge. Most of this money is spent locally, in Alaska.

People come to visit this area because it is unique. Nowhere else on Alaska vast north slope does the Brooks Range approach the coast so close. Nowhere else is it possible to float wild & scenic rivers all the way to the Arctic Ocean in such a short amount of time. Nowhere else is it possible to cross through an area officially protected. Everything else is either open to oil exploration, being opened, or could be opened by another administration. If oil development is allowed here there will be no place protected, except the small section of wilderness east of the Aichilik River.

I can assure you my business & every other outfitter will be seriously impacted. People don't visit the Arctic Refuge to float through an industrial complex. They come here to experience the wilderness of the coastal plain, to see its wildlife, to float its wild rivers, to see the birds that come from all over the world to nest here. Oil leasing & development will seriously harm my business as well as many other guiding business that use this area. The fact that this EIS doesn't even mention the amount of economic impact this will have upon on our businesses show what a rush job this EIS is.

In other words the only river a traveler could float through wilderness to the Arctic Ocean will be the Kongakut River. The loss of this uniqueness needs to be discussed in the EIS. The Canning, Hulahula, Okpilik, Jago, & Aichilik Rivers all support rafters that paddle out of the mountains, across the coastal plain all the way to the Arctic Ocean. Industrial development within the 1002 area will make these trips highly unlikely because clients don't come here to float through industrial areas.

Likewise, the smaller rivers including the Tamayariak, Katakturuk, Marsh Creek, & Sadlerochit also flow across the 1002 area. These river corridors provide routes for pack rafters & backpackers across the coastal plain all the way to the Arctic Ocean. No one will want to hike or pack raft through these areas with oil wells, pipeline, airstrips, gravel pits & other forms of development.

The idea that leasing won't impact these users is avoiding the responsibility of reporting what leasing brings about. The purpose of the EIS process is to analyze the potential impacts, propose mitigating measures, and then to allow decision makers to decide if development should proceed or not. It is not your job to avoid pointing out the impacts of what leasing & development will cause.

On page 3-204 you state that "there would be no potential direct or indirect impacts on recreation from post-lease oil and gas activities in the program area." Nothing could be farther from the truth. This shows how little the folks writing this draft EIS know about the area. Even after more than 40 years we still see the impacts from the seismic exploration activity that occurred during the early 1980s. On our frequent stops, along the rivers, to get out and look for wildlife, we

almost always see evidence left from the 2-D seismic activity that took place after ANILCA was passed in 1980. I can't even imagine what it will look like after 3-D seismic activity.

Even today, if we walk along the tundra uplands above gravel bars of the numerous rivers that flow across the 1002 area inevitably we cut across old seismic lines that were left from winter seismic activity in the 1980's. Even with the tundra frozen these heavy vehicles compressed the thin layer of vegetation. In subsequent summers water has settled into these depressions. In some places the melting has been severe. In others it is just a small depression. However, over the decades a different kind of vegetation has grown along the edge of these depressions. Sometime you can look down these lines for miles.

I can't even imagine what it will be like with 3-D seismic exploration where these interlocking grids will be considerably closer together. Besides this, there are the places where these massive vehicles have to climb onto the tundra. In these places the cuts are often visible for many miles. Then what about the test drilling, where the charges are set off? What about the piles of mud that are left from this drilling? And what about the compaction where the thumper trucks pack down the tundra. All this in a grid pattern. Come on..quit trying to ignore the impacts. If the rest of this EIS is written as poorly as the parts that I have looked at the whole thing needs to be re-done.

The last time that I led a commercial trip down the Canning River (several years ago) the development at Point Thompson, 10 miles outside the Arctic Refuge boundary was so disturbing to my clients I decided I would never lead another trip down that river again beyond the mountain front. From as far away as 20 miles we could see the towers, and the lights, even with 24-hour sunlight. Even though we were camped on the lower Canning River delta, 10 miles away from this development, all night long we could hear a constant thumping with a loud boom every second of every day and night. It was very disturbing to my clients.

No amount of set-backs are going to reduce these impacts. Every river that crosses the 1002 area will be impacted. As development expands virtually the entire 1002 area will be useless for us any longer.

I urge you to propose more alternatives. The range of lower-impact alternatives is not sufficient. One of them should be to not do anything until closer to 2024. An additional alternative should include only the opening up of the high carbon potential area for seismic exploration. This area comprises 427,900 acres, more than is legally required. An EIS for the additional 400,000 acres could be done at a later date. There is nothing in the law that says anything over 400,000 acres has to be analyzed at this time. Since you are not considering Alternative A, this should be your minimum impact alternative....doing the minimum required by law. It is every bit as legal as any of the other alternatives. At the very least this would restrict the impacts to the western one third of the 1002 area. BLM can later do another EIS for opening up more acreage closer to 2024.

Sincerely, Ron Yarnell