
From: Hayes, Miriam (Nicole) <mnhayes@blm.gov>
Sent: Thursday, March 14, 2019 8:47 AM
To: coastalplainAR; Sean Cottle
Subject: Fwd: [EXTERNAL] Comment on the Arctic National Wildlife Refuge Coastal Plain Draft EIS

Follow Up Flag: Follow up
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From: William Walters <wwalters.borealis@gmail.com>
Date: Wed, Mar 13, 2019 at 9:01 PM
Subject: [EXTERNAL] Comment on the Arctic National Wildlife Refuge Coastal Plain Draft EIS
To: <mnhayes@blm.gov>

Thank you very much for extending the comment period, the Draft EIS is quite a read.

Over the years I have had the good fortune to be able to visit the Refuge, and it's coastal plain a number of times: hiking, camping, fishing, and rafting a number of the coastal plain rivers.

There is one point I would particularly like to address, based on my experience and observations: The Draft EIS addresses the ANILCA requirement that the Refuge must insure that it is managed in a way that ensures water quality and quantity sufficient conserve fish, wildlife, and the related habitat. Although the Draft EIS does not actually attempt to quantify the amount of water needed for drilling and ice roads for Alternatives B, C, & D, under any analysis, the amount of water needed on a recurring basis would be astounding.

The Draft EIS does not attempt to quantify the amount of fresh water actually available on the coastal plain, nor what the impact would be on fish, wildlife, and the supporting habitat for the water needed for Alternatives B, C, & D.

My experience is that the Refuge Coastal plain is actually a very water-poor environment. It's classification as wetland arises from the underlying permafrost and the low average temperatures. I know from first-hand experience that the volume of water flow in the coastal plain rivers is very low. In most of the Lower 48, those rivers would be termed "streams." Although the mists, drizzles, and squalls off the Beaufort Sea are common and certainly feel damp, the total amount of precipitation is actually very low. If the coastal plain was in a southern latitude, it would be a semi-desert.

Although the Draft EIS asserts the various proposed lease sales and development will not negatively impact water quality and quality, that assertion is manifestly wrong, and it clearly reveals the EIS did not actually do a rigorous study or a sound analysis of the impacts of Alternatives B, C, & D. The only proposed alternative to actually conserve the water quality and quality to conserve fish, wildlife, and the related habitat is Alternative A, the no-action alternative.

Thank you for considering my comments and concerns. The coastal plain of the Refuge is a quite remarkable place, and it is clear that in founding the Refuge, Congress intended to leave our children something other than a biologically damaged industrial industrial wasteland.

Respectfully,

William Walters
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