

Arctic Audubon
P.O. Box 82098
Fairbanks
99708

2019 MAR 13 AM 10:52

RECEIVED

ALASKAN FRONTIER
995-997
12 MAR 2019 PM 11



BLM

attn: Coastal Plain Oil and Gas Leasing Program
222 West 7th Ave #13
Anchorage AK
99513

99513-750413



ARCTIC AUDUBON SOCIETY

P.O. Box 82098
Fairbanks, AK 99708

www.arcticaudubon.org
arcticaudubon@gmail.com



Arctic National Wildlife Refuge.
Coastal Plain Oil and Gas Leasing Program
Draft EIS Comments

10 March 2019

Arctic Audubon is a chapter of the National Audubon Society with a membership of about 300 residents of Interior and Northern Alaska. Our comments to this Draft EIS concerning oil and gas leasing in the Arctic National Wildlife Refuge are our own. We have voiced our interests in the Arctic for many years and intend to continue our support for these northern lands that are so unique and important to the world. We feel obligated to continue advocating for protection of public lands that support the Arctic Ecological System to keep them as untouched as possible. Thank you for giving us a chance to comment on the Draft EIS for Coastal Plain leasing in the Arctic National Wildlife Refuge ("DEIS" is the reference we will use throughout).

In 1913 Arctic Audubon and 14 other Alaska conservation organizations representing thousands of Alaskans came together in a letter urging Alaskan legislators to oppose opening of the coastal plain of the Arctic National Wildlife Refuge. In this comment the following points were made: "Oil and gas development and wilderness are not compatible; Protecting the Arctic National Wildlife Refuge is important ecologically and culturally; Tourism is vital to Alaska's economy...and businesses; We must pursue alternative ways to meet our energy needs in Alaska and America". This holds as true today as it did 6 years ago when these Alaskans spoke as one.

The law (public law 115-970) that mandates oil and gas leasing program for the Coastal Plain is faulted in that it introduced a new purpose, oil and gas leasing, to the Arctic National Wildlife Refuge without a chance for any public input. Furthermore, this new purpose is inconsistent with established purposes, "to preserve animals and plants in their natural diversity". The DEIS does not address this major inconsistency.

Further reference to public law 115-970 shows the act required that only 2000 acres would be impacted by oil and gas development activities. The publicity surrounding the act confined the activity to a small sector of the western end of the Coastal Plain portion of the Refuge. The alternatives offered in the DEIS go far beyond this boundary and involve many more acres. The space occupied by access and transportation infrastructure (pipelines, gravel pits, roads) is ignored because "it could be reclaimed". Reclamation of arctic tundra is not yet an established methodology with clear prescriptions for success. The Hickel Road of over 50 years ago can still be identified, particularly in tundra wetlands as well as countless other incursions made at inappropriate times and/or with inappropriate vehicles...

Before we continue on to more specific faults we found in the DEIS we would like to point out that there is no well defined need to access new possible oil and gas deposits. In fact the U.S.A. seems to have an overabundance of production with increasing development closer to Prudhoe and the terminus of the pipeline as well as increasing production in the lower 48 states from fracking. Arctic Audubon supports increasing renewable energy sources while decreasing polluting energy sources like oil, and also, to a lesser extent, gas as a clear way to mitigate increased carbon dioxide (driving a global greenhouse effect in the air), acidification of the oceans (from excess carbon dioxide in the air dissolving in water), air pollution, and the release of other toxins.

Major areas of concern

Arctic Audubon supports only Alternative A. We do not support any of the other alternatives for 2 main reasons; they are flawed and often incomplete, and they do not offer protection for arctic resources such as unique plants, mammals like caribou and polar bears, and birds.

More than 200 species of birds use the coastal plain during their yearly cycles of migration, nesting, molting, and migrating again in the other direction. These birds disperse to every U. S. A. State and to 6 other continents. Their needs are diverse but met by the northern tundra ecosystem in a myriad of ways. The DEIS does not offer adequate protections for these birds.

Polar Bears are in a particularly vulnerable position in the arctic today. The changes attributed to global warming are occurring fast and impacting polar bears; for example the shrinking availability of sea ice and changes in feeding behavior. Polar Bear populations have shrunk and the bears are struggling to cope with their changing world. The DEIS does not provide protection for polar bears. In addition starving disoriented polar bears may pose a threat to oil field workers. This is not addressed in the DEIS

Caribou use of this section of the whole coastal plain is well documented for the Porcupine Herd. This is not the same herd that has been displaced by oilfield development in the Prudhoe area. Those caribou had similar tundra to disperse into, these animals of the Porcupine herd have no where to go to get away from oilfield development. In addition these caribou are part of the subsistence lifestyle of the Gwich'in people who live to the East on the porcupine caribou's winter range. We believe that oil development in the coastal plain of the Arctic National Wildlife Refuge can not proceed without harm to the Porcupine Herd.

Industrial Development requires a great deal of water and there is far less in the coastal plain of the Arctic National Wildlife Refuge than in the Prudhoe area. This is obvious when looking at a map of the region. The DEIS does not adequately address the scarcity of water and the habitat damage that would occur from overuse of this resource.

The havoc potential from oil spills is unrecognized. To say that industry has learned how to avoid spills and recover from them is not supported by the recent news of two large spills in north slope oil fields. It has been suggested that these spills are related to melting permafrost, a definite "new" fact of life in a warming climate. The oil companies seem to be scrambling to deal with these new threats to oil well integrity.

Protection for the future

In 1985 Lowell Summer who was one of the earliest promoters of the Arctic National Wildlife Refuge in 1960 wrote eloquently. "...The Arctic National Wildlife Refuge is the handiwork of millions of years of ...evolution-the handiwork of God , many would declare. Every plant and

animal there today has struggled through uncounted thousands of years to adopt and survive, attaining perfection down to the finest details of structure and behavior. ...Here there still survives one of Planet Earth's own works of art, and ...freedom from crowding and pollution,... freedom to be inspired and understand ... and respect the intricate and inscrutable unfolding of Earth's destiny."

We need to maintain the Coastal Plain of the Arctic National Wildlife Refuge in a legal configuration that protects the entire Refuge from intrusive commercial development of any kind. The best results and protection would result from wilderness designation in perpetuity. This would be even better than Alternative A.

Thank you for considering our concerns.

A handwritten signature in dark ink, appearing to read "Gail Mayo", with a stylized, flowing script.

Gail Mayo, Conservation Chair