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**From:** Hayes, Miriam (Nicole) <mnhayes@blm.gov>  
**Sent:** Wednesday, March 13, 2019 11:20 AM  
**To:** coastalplainAR; Sean Cottle  
**Subject:** Fwd: [EXTERNAL] Coastal Plain DEIS comments

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From: **Jeff Fair** <[fairwinds@briloon.org](mailto:fairwinds@briloon.org)>  
Date: Wed, Mar 13, 2019 at 10:18 AM  
Subject: [EXTERNAL] Coastal Plain DEIS comments  
To: <[mnhayes@blm.gov](mailto:mnhayes@blm.gov)>

March 12<sup>th</sup>, 2019

Nicole Hayes, Coastal Plain Project Manager

BLM-Alaska Office

Re: BLM public comment on the Coastal Plain Oil and Gas

Leasing Program Draft EIS

Dear representative BLM officials,

I write to you and this meeting from a small cabin on the toe of Lazy Mountain near Palmer Alaska. I'm an independent Alaskan wildlife field biologist and freelance writer; I've lived in Alaska now for over a quarter century. I've worked in Alaska's Arctic on visits for nearly that long, including in the 1002 Area of the Arctic Refuge, and I've written many times about life on the NPR-A and the Refuge. None of this issue is new to me, and unlike most of you (but not all!) there in D.C., I have trod these grounds. I have observed the teeming wildlife on the breeding and calving grounds, and the hard bite of winter there. I know the realities, not nearly as well as the Inupiaq and the Gwich'in People, or the full-time Arctic biologists, but likely better than most of the rest of you. I have many highly respected friends who work for Big Oil above 70° North Latitude, others who study the wildlife there, some who lead hiking and rafting trips on the

Alaskan Arctic foothills and coastal plain, others who hunt and fish in and around the Refuge, and who wish to protect Arctic Alaska and its wildlife, in particular the 1002.

Most of what I would like to say has already been said a thousand times or more: the value of that highly productive portion of the Refuge, our lack of need for more oil and gas—we'll just sell it overseas—its contribution to further global warming in an era when we already have a surfeit of carbon-based energy, the American value of wildness, a unique existing full ecosystem, and the devastation of the last 5% of American Arctic coastal plain that serves as a control, scientifically, to compare to the developed areas across far-north Alaska to assess the impact of drilling. As a biologist and author, I've already signed on to two congregate letters, one from professional wildlife scientists and managers who criticize the draft EIS from a more professional place than BLM glance-by attention could possibly have offered, and another from teachers, scholars and Alaskan Natives who bring up similar and additional perspectives, and are planning to take this issue to the lower 48 seriously. You'll see both letters as parts of the public comment. I hope that you'll consider them closely.

So what I wish to testify to here, is regarding the mendacious, back-room, rushed, ram-rod fashion in which this whole culture of subterfuge (on the American people) is being carried out in order to ram-rod drilling in the Refuge. It has not been a democratic process.

But I'll begin with a few highly significant and necessary issues for an EIS of this caliber that I don't see addressed in the draft EIS nor completely addressed elsewhere.

The first of these is that the origin of this threat to the 1002 and the Refuge itself came from a sneaked-in provision from Senator Murkowski to the totally unrelated 2017 Tax Cuts and Jobs Act. I see no indication that there was ever a substantive discussion on the Senate floor over this major concession. It seems to have occurred behind closed doors and overshadowed by the many Trump administration moves to damage our environment and economy. This was a move of dishonest and disingenuous representation by the Senate that directly supported corporate income and violated Americans' will and opinion for the federal lands in the Arctic National Wildlife Refuge. So much for a representative republic.

Second is that the BLM continued to ram-rod and pursue this "opening" even through the governmental shut-down, when one could not get an answer at the key BLM offices, but they were still working forward to drill. That was criminal, and they got caught at it.

The fact that the draft EIS is weak, shallow, uses outdated data and little scientific basis for its many pronouncements is already well-told and will be deeply specified before March 13th. I will note that here that it says nothing beyond a line in Table 3-31 about our U.S. treaty with Canada to protect the Porcupine Caribou Herd; it says nothing about what happens to the wild view shed (and the American experience) from the north slope and foothills of the eastern Brooks Range for those who manage to get there for a wilder experience. Looking northward, trekkers and rafters will see big industry, smoke, flares, lights, where for millennia was a view of wildness to the Beaufort Sea and beyond that still moves the human heart. I'll also note that the draft EIS says nothing about the effects of global warming on its own oil-laden developments planned for the 1002. Global warming is occurring faster at Arctic latitudes than anywhere on earth. Faster than calculations from a few years ago. Much of the 1002 coastal plain is very close to sea-level. Oil production won't begin for 10 years or more they say. Will any of the drilling pads or roads along the pipelines likely be flooded in 20 years? Not a word; no research in the draft EIS. Much of that productive land (for wildlife) is a wet sponge over permafrost. Will it flood more now that global warming is melting the Brooks Range snow earlier and faster as it is channeled down through. Will the drill pads sink as the permafrost melts? Will that create more spills than already occur in our Arctic? Will higher flows in the twelve major rivers draining the eastern Brooks across the 1002 and flooding the lowlands on the plain be of any alarm to the extractive industry?

So now we read that oil wells near Prudhoe are failing, likely or possibly due to the melting of permafrost due to climate warming (which affects our Arctic faster than just about anywhere). This is one more reason NOT to drill the 1002 Area of the Arctic Refuge at this time. Anything about this in your dEIS?

Not a word. Some Environmental Impact Statement. Where is your (BLM) assessment of these potential impacts?

Finally this: BLM's hearings on the draft EIS have been a charade. Announced two business days before the first on February 4<sup>th</sup> in Fairbanks, with no planned chance for folks to speak to the attendees. So is the dEIS itself. Though it claims to be in cooperation with the Villages of Kaktovik, Venetie, and Arctic Village—the latter two among so many other Gwich'in villages unmentioned who depend upon the Porcupine Caribou Herd—the BLM has ignored their information, requests, and intent to contribute to this document, much as the BLM has ignored western science.

I find this both racist and corporately biased. Very un-American.

Jeff Fair

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