

Comments on the BLM's Draft EIS for Proposed Oil and Gas Leasing Within the Arctic National Wildlife Refuge's Coastal Plain

My name is Bill Sherwonit, a nature writer and longtime Alaska resident. Thank you for this opportunity to speak. I'm among the Alaskans who strongly oppose the government's proposed oil and gas leasing program in the Arctic National Wildlife Refuge's coastal plain and urge the BLM to halt this misguided effort.

Rather than any sort of industrial development, I (like many others) wholeheartedly believe that the coastal plain should be preserved as wilderness, for many reasons. Among them is this fact: the coastal plain's true importance has nothing to do with us humans. Its lands and waters are breeding, nesting, spawning, calving, feeding, and denning grounds for caribou, polar bears, muskoxen, wolves, voles, loons, ducks, shorebirds, snowy owls, arctic grayling—more than 250 species in all.

There's a reason that many people, including scientists, consider the coastal plain to be the Arctic Refuge's "ecological heart." As the U.S. Fish and Wildlife Service has noted, the plain has the greatest wildlife diversity of any protected area in Alaska above the Arctic Circle.

Alaska's Gwich'in Athabascan people have an intimate relationship with that wild heart and they're the people who stand to lose the most if the coastal plain becomes industrialized. The draft EIS does not adequately consider the many impacts of industrial activities on the refuge's wild heart and the Gwich'in people, who consider development that like proposed by the government to be a violation of their human rights.

The BLM also needs to more seriously—and in much more depth—consider oil and gas development's impacts to climate change, which as you know is affecting Alaska's landscapes and communities of plants, wildlife, and people far more than any other part of the nation. In what can only be considered a tragic irony, oil production on the coastal plain would only worsen the devastating climate impacts already occurring throughout Arctic Alaska.

As you also know, among the animals likely to be most harmed by climate change—and by the industrial development of the coastal plain—are polar bears.

As recently as the late 1990s, Alaska's polar bear population was considered to be healthy and stable, perhaps even slightly increasing, but its status has changed dramatically. The southern Beaufort Sea population is now considered to be falling and the scientific consensus is that climate change and associated declines in Arctic sea ice present the greatest danger.

It's also critical to note that recent polar bear research has confirmed much of the species terrestrial maternity denning occurs within the Arctic Refuge's coastal plain.

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So during a time when the Beaufort Sea population has declined significantly and the U.S. government has listed polar bears as globally "threatened" because of sea ice declines, they appear to be increasingly reliant on the Arctic Refuge's coastal plain.]

Even more than caribou, polar bears may now symbolize what could be lost if the coastal plain were opened to development. Yet great concern remains for the Porcupine

Herd—and the many other forms of life that inhabit the refuge's ecological heart.

Besides these broader concerns, I have a few specific comments about the draft EIS that BLM has put together:

- All of the proposed action alternatives would have seriously harmful—and therefore, unacceptable—impacts on the Coastal Plain and its wildlife.
- The draft EIS does not adequately show the sprawling, spread-out nature of the industrial development associated with exploration and production activities. The presentation of information is therefore misleading and needs to be corrected.
- Though it contains infrastructure requirements, companies are allowed to request waivers, exceptions and modifications. How is the public supposed to adequately comment on development impacts if it doesn't know what requirements will actually be enforced?
- The law that Congress passed authorizing development on the coastal plain limits "surface disturbance" to 2,000 acres. But it's my understanding that BLM has interpreted that limitation to exclude ice roads, many miles of elevated pipelines, gravel mines and other infrastructure. BLM should include *all* oil and gas development-related infrastructure in its 2,000-acred determination.
- It's also my understanding that many of the proposed actions to protect caribou are adapted from requirements in the NPR-A. However, there are substantial differences in the two areas and how the caribou use them. Protective measures in the Arctic Refuge must be based on the best available science for the coastal plain and its wildlife, not projections from NPR-A or elsewhere.

Given the shortcomings outlined above and others identified by scientists, local residents, and other concerned citizens, the BLM must issue a revised draft EIS that is fully compliant with its legal obligations to analyze all of the impacts of oil and gas development on the coastal plain and its wild inhabitants.

Here I'll offer some parting thoughts:

"Unique" is sometimes used too casually, but in this case it fits. A place of immense natural vitality, the refuge's coastal plain is the only large swath of Alaska's—and thus the nation's—Arctic coastline that has remained off limits to development. And yet it accounts for only a tiny percent of Alaska's North Slope.

Meanwhile the arguments for oil and gas development, especially in a remote and fragile place during a time of climate upheaval, have diminished. Our nation needs to put its focus elsewhere, on different energy sources. Opening the Arctic Refuge to oil drilling would only feed an increasingly harmful human addiction.

As I've commented before, and continue to firmly believe, instead of seeking to develop the Arctic Refuge's Coastal Plain, our state's Congressional delegation and the current administration should help to protect the place "Where Life Begins." It would be a grand gesture especially during a time of climate upheaval, when leaving the coastal plain's oil and gas in the ground is not only the right, but the sensible thing to do, considering all that's at risk, including the well-being of Alaska's future generations.

Thank you for considering my comments,

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