
From: Hayes, Miriam (Nicole) <mnhayes@blm.gov>
Sent: Thursday, March 14, 2019 8:44 AM
To: Sean Cottle; coastalplainAR
Subject: Fwd: [EXTERNAL] Comment re Coastal Plain Draft EIS on oil leasing and development in the ANWR

Follow Up Flag: Follow up
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From: Sarah Keller <2harness_entropy@runbox.com>
Date: Wed, Mar 13, 2019 at 5:55 PM
Subject: [EXTERNAL] Comment re Coastal Plain Draft EIS on oil leasing and development in the ANWR
To: mnhayes <mnhayes@blm.gov>
Cc: ryan <ryan@northern.org>

Thank you for the opportunity to comment on the Coastal Plain Draft EIS for oil leasing and development on the Arctic National Wildlife Refuge (ANWR) in Alaska.

I am an Alaska resident for more than 40 years and have observed the perennial debate over development in ANWR. As initially a seasonal biologist for the federal government (USFS, USFWS, BLM) and then as a biologist for the State (ADF&G), I had the opportunity to work in many areas around Alaska, including in ANWR. I am now retired from the AK Department of Fish and Game. I believe my education and experience give me some standing in these discussions.

As a biologist, I am aware of the importance of the Migratory Bird Treaty Act (MBTA) of 1918. The federal government has the responsibility for environmental protection and conservation of migratory birds. It is well documented that millions of birds of many species use the ANWR and the coastal plain to nest, forage and safely molt. Due to the MBTA, let me repeat, the federal government including the BLM has the responsibility for the environmental protection and conservation of migratory birds. The DEIS minimizes impacts to the point of absurdity. For example, if the 2000 acre rule (the limit on surface area development) in the DEIS was in keeping with the MBTA, it would include gravel mines, pipelines, and pads and other disturbances to the coastal plain. The areas used for development cannot at the same time be used by birds for the uses stipulated in the MBTA. These areas (gravel mines, pipelines, pads, etc.) must be counted within the 2000 acre rule. Nor can these affected areas be reclaimed to their original use in any reasonable time period.

Also as a biologist, I am aware of the importance of water for wildlife, birds as well as all other natural residents of the coastal plain in ANWR. Both the quality and quantity of water are important to survival and successful rearing of young. The provision of water is one of the specific purposes of the establishment of the Arctic National Wildlife Refuge. Where is the analysis in the DEIS of how much water will be required and how it will be used by all stages of oil and gas development? How is that documented? Where are the comments and concerns by agencies such as the US Fish and Wildlife Service incorporated in the discussion of water use?

As a biologist, I am certainly aware of the cost to all forms of life from an oil spill. These events are never truly mitigated or reversed. Every Alaskan here in that year well recalls the shock of the oil spill in 1989 in Prince William Sound. Thirty years later, the crude oil is still buried in the beach sand and releasing toxic chemicals. There are deep tradeoffs to oil development and these must be illuminated, not minimized in the DEIS.

As a biologist, I value the recommendations from the Intergovernmental Panel on Climate Change (IPCC). This landmark report was released in October 2018. The results of this report should be heavily incorporated in the DEIS and is clearly not. Additionally I recommend incorporating and referencing the information from the National Weather Service Alaska Sea Ice Program (ASIP).

As a biologist, I hear the arguments about impacts on polar bears (who are increasingly limited in their habitat on sea ice) and impacts on the Porcupine Caribou (not to be confused with the Central Arctic Herd nor the Western Arctic Herd). These are important animals to local residents and their existence is important to Americans who will never visit the area, but value knowing the refuge was set aside in part for them. These populations of signature species as well as the role of the ecosystem of the coastal plain to which they belong, are in fact valuable to our nation. Hence the importance of Refuges.

As a biologist, I understand the value of wilderness and an intact ecosystem. Indeed, there is intrinsic value to humans of the same. Hence the Arctic National Wildlife Refuge was land set aside with wilderness designations. Oil and gas development vastly impacts wilderness. I understand there is economic value of oil and gas development, but I argue that it benefits only a few, especially those in the industry and only for a limited time. While the benefits of wilderness and an intact ecosystem, benefit our nation and beyond our borders for all time.

Thank you for the opportunity to comment.

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