
From: Hayes, Miriam (Nicole) <mnhayes@blm.gov>
Sent: Monday, March 4, 2019 8:28 AM
To: coastalplainAR; Sean Cottle
Subject: Fwd: [EXTERNAL] comments on Arctic Refuge EIS

Nicole Hayes

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----- Forwarded message -----

From: **Heather Mirczak** <hmirczak@gmail.com>
Date: Sat, Mar 2, 2019 at 4:23 PM
Subject: [EXTERNAL] comments on Arctic Refuge EIS
To: <mnhayes@blm.gov>
Cc: <ryan@northern.org>

March 1st, 2019

Dear Ms. Hayes,

I am writing with regard to the Arctic Refuge Leasing draft EIS published on 12/28/2018. I would like to air my concerns with both the process and the document. As a resident of Alaska who recreates in the Arctic each summer, I have a vested interest in the land and how it is used and developed.

The first of my concerns are in the parcel size and expansive nature of the proposed leases. It is my understanding that the required acreage is 400,000 for each sale, but the proposals offer much greater acreage. I am opposed to this and would like to know why. At this moment I would advocate for keeping any lease to the maximum of 400,000.

I understand that any lease also includes an acreage limit on the surface development. The draft EIS stipulates a 2000 acre limit, however, as written this does not include ice roads, pads, elevated pipelines and gravel mines. This does not compute for me. As an Arctic traveler in both summer and winter, I have seen the remnants of infrastructure from all of these things. This provision seems to greatly expand the acreage that is being exposed and altered by the lease sale. I am concerned that the language also specifies "2000 acres at any given time" which does not limit the structures to a given area but allows for increased development of these structures over time. This means again greater disturbance over a wider expanse of the Refuge. Should these structures be abandoned at some point the arctic runs the risk of being littered with eroding infrastructure much like the military installments in the Aleutians and elsewhere in the state.

My concerns about development do not stop there. The Refuge is home to the Porcupine Caribou Herd and it is known that the herd uses this area for calving and traveling to the coastal plain. We know that anything that prevents or disrupts the herd from the coastal plain is detrimental to calf survival. Arctic wildlife, or more specifically larger mammals such as the polar bear and the caribou are already strained with the warming temperatures and effects they

are having on the arctic ecosystem. The coastal plain area of the refuge is now playing “home” for denning polar bears. As sea ice is lost these mammals are being pushed further inland. The DEIS has stated that the potential effects on the polar bear population could be high. At this point 77% of the program area constitutes critical polar bear denning habitat.

Lastly, if it's possible to have a last concern about the opening of the Arctic Refuge to drilling, is the concern of water as a resource. At this time the amount of surface water available on the coastal plain is limited. The BLM does not have conclusive studies on water availability. It appears that construction of infrastructure like ice roads and pads require a significant amount of water (1 million gallons for every mile of road constructed and 500,000 for every ice pad). This does not account for the amount of water needed for daily oil production. My concerns are twofold: first is the effect of drilling and development on the existing water sources along with the many species who rely on them and the pristine quality of the water. The precedent of resource extraction (mining, fracking, drilling) and it's contamination of water sources is well documented. Many places that were once pristine (Valdez, AK as an example) are still dealing with impacts from contamination due to resource extraction. It may not be large volume disasters that are the biggest concern but the consistent yearly barrage of chemicals, small spills, and leaks that have cumulative effects over time. My second concern, as mentioned earlier, is the amount of available water.

The process of pushing through the Arctic Refuge EIS appears to be quite rushed. I understand there are over 700 pages when you include the many appendices. It is a gargantuan task for our senators, law makers and interested parties to review, digest and thoughtfully analyze this much material in a 45 day period. As this policy is an irreversible decision, it should be given the full scope of time for proper analysis and public comment. The EIS was released just before the government shutdown in which employees were not in place to answer questions or receive public comment.

It seems many steps are being rushed and varied stakeholders have not been given adequate information or time to be involved in the government process. Again, with an irreversible decision I would expect and request that the government follow the time guidelines of 120 days for reviewing and processing policy of this complex nature.

Thank you for your time,

Sincerely,

Heather Mirczak
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