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[EXTERNAL] Comment on the Draft Environmental Impact Statement for the Arctic National Wildlife Refuge

1 message

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To: blm_ak_coastalplain_eis@blm.gov

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Ms. Nicole Hayes,

I am dismayed to see how inadequate the EIS is for the Arctic National Wildlife Refuge. These are not only critical calving grounds of the Porcupine caribou but the Refuge is also an intact wilderness that will be destroyed by opening up the coastal plain for destructive oil and gas development. Already far too much of Alaska's coastal plain has been severely impacted by industry. To consume the heartland of ANWR, and forever alter its ability to support wildlife populations, is a travesty beyond measure.

I have traveled extensively over the last 30 years in the neighbouring lands of northwest Yukon in Ivvavik National Park, also a critical area for the Porcupine caribou herd, and for countless other wildlife species. I have also traveled in ANWR itself. The two are interconnected as one ecosystem that stretches across the Canadian border, and thereby what happens on one side of the border impacts the other. This is why decades ago there was pressure put on Canada to preserve the remainder of the Porcupine caribou's calving and summer grounds, and habitat for other Arctic species, as well as preserve the wilderness integrity of this remarkable region of the planet. It was well recognized at that time how critical this habitat was for the well being of the caribou as well as other species. Ironically it is now the US government that is proposing destruction of the crucial habitat on the western side of the international border.

I have a wilderness tourism business based in the Yukon and have guided hundreds of North Americans as well as overseas visitors down the rivers and through the mountains of Ivvavik National Park over the last 30 years. I have seen time and again how transformative these experiences are for people, in a world where wilderness and intact habitat is in ever decreasing supply. Once impacted by industry, and especially an industry like oil and gas which has such massive imprint on the land, wilderness never returns to its original state. Intact wildlife habitat, wilderness, and clean water and air IS our greatest resource on this planet. It is far greater in the long run than a few years of oil and gas resources. To sacrifice the former for the latter is not only an indication of human greed but of extreme short sightedness.

I have gone through the Draft Environmental Impact Statement and there are innumerable points I would like to make. I realize you must have received detailed analysis on the shortcomings of the EIS from multiple sources so I am not going to go on at length here to reiterate them. But there are some key points. In short the EIS fails to comprehensively analyze the impacts of oil and gas leasing in the Arctic National Wildlife Refuge, including transboundary impacts. It repeatedly understates the importance of the Coastal Plain to the Porcupine caribou herd, and suggests that drilling would not cause the Porcupine caribou to decline. The review also fails to acknowledge Gwich'in in Canada when determining what communities could be "appreciably affected" by changes to population patterns in the Porcupine caribou herd.

The science is shoddy..The studies that are cited to prove the points the EIS is trying to make are either old or inadequate and it fails to refer to the scientific studies that do prove the impacts oil and gas industrial activities have on wildlife species. The EIS makes no reference to the value of wilderness and how intact wild lands and waters are far more precious than any amount of oil in the long term on our planet. The EIS does not acknowledge the pollution that is synonymous with OIL extraction. Let's face facts. Spills are inevitable! throughout the industrial process, including in the transportation of oil and gas to market. Inevitable and can be catastrophic (eg Exxon's disaster in Prince William sound). The BLM is clearly prioritizing oil and gas extraction over the ecological and cultural values of the ANWR, for which ANWR was established in the first place! All the scenarios that are being proposed result in major industrial development of the fragile and precious coastal plain. Why is the BLM not addressing how oil and gas leasing would impact the rich conservation purposes of the ANWR. How can one have any trust in an EIS that makes ridiculous claims like "potential marine spills would not be toxic to birds"? On countless levels this EIS falls short of what it is meant to do - truly assess environmental impacts of oil and gas development on the Coastal Plain of Alaska. It is obvious that the BLM is in favour of industrializing this sacred corner of the continent. the mitigations it suggests are useless, catering to an industry that has proven itself to be the cause of great harm to this planet; an industry that has proven time and agein that it cannot be trusted to operate without irreparably damaging the land, waters, and habitat on which it operates. Even just one road into the 1002 lands is a death sentence to the wilderness and wildlife habitat of that country; one road, access to one well site, will inevitably lead to a spider web of roads that carves up the land for all

time.

Thank you for the opportunity to comment on the draft EIS. My hope is that these comments and the hundreds others you will have received are actually read, listened to , and prove to you that the EIS is inadequate in assessing impacts and needs to be redone, and conservation and cultural values TRULY be considered. A properly done EIS would prove that opening up the Coastal Plain of ANWR to oil and gas development will destroy all the values that ANWR was established for.

Sincerely,
Jill Pangman
Whitehorse, Yukon