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Sent: Thursday, March 14, 2019 8:58 AM
To: coastalplainAR; Sean Cottle
Subject: Fwd: [EXTERNAL] Draft EIS for Oil leasing on the arctic coastal plain

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

From: **Hugh Rose** <hrose@alaska.net>
Date: Thu, Mar 14, 2019 at 12:47 AM
Subject: [EXTERNAL] Draft EIS for Oil leasing on the arctic coastal plain
To: <mnhayes@blm.gov>
Cc: <ryan@norethern.org>

To Land Managers at BLM,

I have been a resident of Alaska since 1993, living in Haines, Healy and for the last 21 years in Fairbanks. In 1998 I visited the coastal plain of the Arctic National Wildlife Refuge (ANWR) for the first time while floating a river in the refuge, and I have been fortunate enough to return many times to visit the coastal plain of ANWR over the years since, including a two week trip floating the Hula Hula River in July of 2018. I would like to relate a little of what I saw 8 months ago as I floated from the Brooks Range to the Beaufort Sea Coast through the center of the arctic Coastal Plain.

The coastal plain of ANWR has been described as the biological heart of the Refuge and I believe this is the most accurate description for this piece of ground, which lies on the north slope of the Brooks Range in NE Alaska. Every time I have set foot on the coastal plain or floated down one of the many rivers that flow across this area, I have been amazed at the quantity of life (bird, mammal, insect and plant), for a place that has been branded as a "biological desert" by the proponents of drilling. Clearly the people who say this is a "biological desert" have never set foot on the coastal plain. On July 14, 2018 I hiked from my camp six miles south of the Beaufort Sea shoreline to the coast where the Hula Hula and Okpilak Rivers enter the Sea a few miles apart. As we departed camp on our hike that beautiful sunny warm morning we had no idea what lay in store for us later in the day when we reached the coastline and stood on the delta between the mouths of the two rivers. Let me back up for a moment and relate our experience from six days earlier at the edge of the mountains before we started across the coastal plain. Six days before we had encountered roughly 90,000 caribou from the Porcupine herd, migrating south and eastward as they streamed off the flanks of Kikitat Mountain and poured across the tundra to the mouth of Katak Creek and ultimately to the west bank of the Hula Hula

where they dove headlong into the raging Hula Hula River to continue south and eastward. We sat for 14 hours and watched as wave after wave of caribou, cows, young calves and bulls poured from the hills to the mouth of Katak Creek and entered the swift flowing waters of the Hula Hula, to follow the caribou that were ahead of them, leading the way on the eons old march to higher ground in the mountains away from the mosquitos that were waking from their winter hibernation. We sat and watched this spectacle of life and we all thought that there couldn't be a more amazing experience than what we were watching on July 9 at the mouth of Katak Creek. However, on the afternoon of July 14 as we walked parallel to the eastern most channel of the Hula Hula River, we encountered the largest mammalian aggregation that is possible to be seen in North America. As we approached the coast line we started seeing small groups of 15-20 caribou. These groups grew in size to 200-300 caribou and within 45 minutes we came upon a group of 2,000-3,000 caribou. We continued north towards the coastline and pretty soon we could see large groups of caribou moving eastward from the west side of the Hula Hula and streaming into the area between the Hula Hula and Okpilak Rivers. We sat down on a sand dune on the delta between the two rivers and watched. Over the course of 3 hours over a 100,000 caribou poured eastward off the coastal plain to pack in this narrow strip of land between these two rivers and soon we were completely surrounded by caribou. It was the most awe inspiring sight I have ever seen. The coastal plain for as far as we could see to the south (20 miles at least), for 5 miles to the west and a mile to the east was a solid seething mass of caribou. And I couldn't help but think; this is ground zero for oil exploration and development. Looking across this mass of moving mammals and the sheer surface area that they occupied, it was abundantly clear to me that a caribou herd the size of the Porcupine and oil development are mutually exclusive. At 7:30pm that evening, word spread amongst the caribou that it was time to start moving (the mosquitoes which had been non-existent until a few hours before were emerging in huge numbers and tormenting the caribou), and soon there was a line of caribou 15 miles long and 50 caribou wide streaming eastward across the coastal plain. For hours the caribou that had amassed around us on the spit of land between the Hula Hula and Okpilak Rivers streamed eastward, but it seemed that there was a continuous supply of animals to replace the ones that were moving out. Finally at 9:30 pm we had to walk back to our camp through the line of migrating caribou. The line of animals simply split around us as we walked south and soon we were back in the quiet world of the coastal plain, listening to the whine of mosquitoes rather than the grunting of 100,000 caribou on the move.

To anyone who says the 1002 Area of ANWR is a "biological desert", I say this is simply untrue and I have the photographs to prove it! The coastal plain of ANWR is a national treasure for its wildlife, wilderness and aesthetic values, to sacrifice this for a few months-worth of oil would be one of the most short sighted decisions this country could ever make. There are a myriad of other reasons to not open this area to oil development as well. The Gwich'in and Inupiaq people have depended on the caribou as an important source of subsistence food for 1000's of years. It is so important that the Canadian and US government signed a treaty in the 1980's to protect the calving grounds of the Porcupine herd on both sides of the international border. The Canadian government followed through and created Ivvavik and Vuntut National Parks to protect the caribou where they calve on the Canadian side of the border. Why has the American government not followed through on their half of the agreement? The thousands of indigenous people who rely on these caribou as the main source of subsistence protein on both sides of the border are counting on the US government to help them maintain their subsistence ways. For the US government to turn its back on this fact is a human rights issue that spans the international border!

The coastal plain of ANWR has the highest density of land denning polar bears anywhere in the world except for Churchill on Hudson Bay. As a wildlife photographer it is illegal according to Federal law for me to go within one mile of a denning polar bear. Violating this law carries severe penalties. This law is in place for a very good reason and that is to protect female polar bears with their newborn cubs when they are in maternity dens. So please explain to me why it is OK for seismic exploration to go on and the construction of an oilfield in the area that has the highest density of denning polar bears? A single photographer with a lens may endanger the long-term wellbeing of a sow polar bear and her cubs, but setting geophysical survey lines 600 feet apart and running "thumper trucks", cat trains and drill rigs across the tundra won't disturb the bears?? This defies all logic and common sense!

For the proponents of drilling that say it is a matter of national security, this is simply not true. Firstly we have grown into a nation of net oil and gas exportation, so we simply DO NOT need any oil that may lie below the coastal plain; and secondly the coastal plain of ANWR is so far away from the markets where it will be refined and consumed and it has to travel down an 811 mile long indefensible pipeline! And if it is a matter of national security, why are we exporting oil from the North Slope of Alaska now to Japan? This argument has no truth and no logic, fake news..

Then there is the draft EIS itself. There are so many things wrong with this document it would take me pages and pages to point out every incorrect fact, ever wrong assumption and every mistake. Suffice it to say the draft EIS was a hastily drafted document that was written by individuals who do not fully understand the coastal plain and its ecosystem.

In summary, the coastal plain of ANWR is a wilderness of rich biological diversity and biomass that hangs in a delicate natural balance. This place serves as the biological heart of the vast Arctic Refuge and is the primary calving grounds for one of the last great mammalian herds in North America. To construct an oilfield in this delicate arctic ecosystem would cause irrevocably damage and upset the natural balance of life across a vast area of the arctic reaching far beyond the boundaries of the 1002 Area. I urge the land managers at BLM to reject the draft EIS and put a halt to any attempts at oil development in the 1002 Area of ANWR.

Sincerely

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