

**PUBLIC COMMENT TO THE  
U.S. COMMISSION ON OCEAN POLICY  
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I have a simple request. Please do not forget about the Arctic Ocean. The zone where the sea ice melts into open water along our continent's northern rim is known as the "Arctic Ring of Life." Aptly named by a prominent Russian polar bear ecologist, this area supports a unique and vulnerable ecosystem, with polar bears, seals, and fish like Arctic cod, Arctic whitefish, and Arctic char (now called Dolly Varden); whales, invertebrates, under-ice algae, and rare boulder patch kelp communities. Native Alaskan people have depended on the coastal wealth for millennia.

The Arctic barrier islands, lagoons, coastal wetlands, river corridors and ocean polynyas and leads host millions of migratory birds that migrate from nearly every state and six continents to nest, feed and stage during summer's burst of life. The Porcupine caribou herd seeks crucial insect relief along its shorelines – and even on the sea ice itself-- after calving in the coastal plain of the Arctic National Wildlife Refuge. Americans far from these nesting, calving, feeding, and migratory routes of fish and wildlife depend on this ecosystem for their subsistence and cultural way of life, the birds they watch on their local beaches or bays, and just for knowing that there are natural, wild places remaining intact on earth.

You may think that the Arctic Ocean is not threatened, not like the Bering Sea or the North Atlantic. But it is on the frontline of global climate change. The sea ice is thinning, portending profound impacts to polar bears, just to name the most obvious. This is a serious concern to Alaskans. We walk along the Arctic coast and see the eroding bluffs, the exposed permafrost. Furthermore, the Prudhoe Bay industrial complex, and development now pushing further into the Beaufort Sea, is a substantial source of greenhouse gases, even if the burning of the fossil fuels primarily takes place elsewhere.

The Interior Department has launched an aggressive new oil and gas leasing program across Alaska's Outer Continental Shelf, with 8 sales planned for the next 5 years. The first is a series of 3 sales in the Beaufort Sea stretching from the Canadian border nearly to Barrow. At 9.6 million acres each, this is 10 times the size of the last sale held in the region. Unlike the last sale, the Interior Department plans new leasing off the coast of the Arctic National Wildlife Refuge, off the Teshekpuk Lake area of the National Petroleum Reserve-Alaska, and throughout the bowhead whale fall feeding grounds and spring lead migratory pathway.

Offshore exploration and development threatens the integrity of the Arctic Refuge from oil spills caused by offshore wells, noise from industrial activity, and the threat of onshore support infrastructure in the biological heart of the refuge itself. Offshore development does not only have impacts in the marine waters, but also on the biologically rich shorelines, and also on the adjacent tundra wetlands. We will work hard to protect the existing OCS leasing moratoria in Bristol Bay, but other areas of Alaska's coast also need permanent protection from offshore drilling.

There have been significant negative impacts from offshore oil activities already. Seismic exploration noise and drilling has diverted the migration of bowhead whales. Exploratory drilling muds persisted in shallow lagoons for years.

People don't think much about the fish in the Arctic Ocean, but they are important to the people who live along its coasts and also as a component of the ecosystem. Along the Beaufort Sea, the nearshore waters are like one long estuary, but people don't think about it that way. The cumulative impacts of offshore gravel roads, or causeways, from the Endicott oil field, West Dock, and other facilities resulted in changes to the water circulation patterns. These impacted nearshore fish habitat by altering the salinity and temperature suitable for the migration of the young fish. The Corps of Engineers required some additional bridging, but its true effectiveness in mitigating impacts is unknown. Scientific studies found that that humpback whitefish migrating eastward from overwintering in the Colville River had been blocked by the West Dock causeway prior to breaching, and that growth rates of juvenile Arctic cisco and broad whitefish were negatively affected by the habitat changes of these docks. Another dock was built for the Badami oil field without comprehensive baseline studies, and Exxon has another causeway on the drawing boards for its Pt. Thomson development right next to the Arctic Refuge.

But offshore development has only begun. The Northstar oil field, which began production last year it is connected to land with a buried sub-sea pipeline and as such is the first truly offshore field in the Arctic Ocean. Through field tests required by the Alaska Department of Environmental Conservation's oil spill contingency plan, oil companies have shown they cannot clean up oil in the broken ice and open waters of the Beaufort Sea just six miles from shore. I witnessed a number of the field drills and saw the difficulties of getting gear out of the dock, much less actually deploying containment and response gear.

Add to that, the cumulative impacts of industrialization of the region from onshore oil and gas exploration and development, since this is inextricably linked to any offshore developments. The Prudhoe Bay oil fields are not a dot on the map, they sprawl over 1,000 square miles, with over 1,000 miles of pipelines, 500 miles of roads, 4000 oil and gas wells, 170 production and exploration drilling pads, 2 refineries, many airports, 5 docks and gravel causeways, and a total of 23 production plants, gas processing facilities, treatment plans and power plants. In the state and federal waters, 84 exploratory wells have been drilled to date. This is far greater than what had been predicted when the

environmental impact statement for the first Beaufort Sea lease sale was done. It expected 24 exploratory wells to be drilled.

Another threat to the Beaufort Sea is the so-called “over-the-top” natural gas pipeline route. BP, Exxon and Phillips are considering an offshore, buried natural gas pipeline from Prudhoe Bay to Canada, including in the waters off the coast of the Arctic National Wildlife Refuge. In fact, they launched intensive seismic surveys there without having started the environmental impact statement review process. Conservationists in Alaska are united in opposing this and other Prudhoe Bay natural gas pipeline routes that cross frontier “wilderness” areas.

Our nation has protected a tiny bit of our Arctic Ocean coast line forever as designated wilderness – just thirty miles of coast line within the Arctic National Wildlife Refuge – that includes Demarcation Bay and some coastal lagoons and barrier islands near the Canadian border. (This is wilderness as defined by the Alaska National Interest Lands Conservation Act which maintains protection of subsistence resources and access as this is a purpose of the Arctic Refuge.)

Right now, a total of just 5% of Alaska’s North Slope is protected by law– albeit precariously—in the Arctic National Wildlife Refuge coastal plain. Offshore, and onshore, the rest has been available to the oil and gas industry for leasing, exploration or development. This is certainly not balance. Your Commission can help create a new vision that incorporates the value of protecting America’s marine and coastal ecosystems as wild, natural places.

Americans made a visionary commitment decades ago to protect the ecosystems of which polar bears are a part, in particular their denning, feeding, and migratory routes through the International Agreement on the Conservation of Polar Bears. This bold step served as an icebreaker during the Cold War, wherein citizens and scientists opened up conversations across a huge political divide because people simply cared about polar bears and the critical habitats they depend upon. A lot has changed in the Arctic since that treaty was signed over 30 years ago but this experience can remind us that we can surmount great obstacles in working to protect ocean and coastal ecosystems, including that of the polar bear now threatened by direct industrialization and also global warming.