March 7, 2019

Nicole Hayes
Bureau of Land Management
Attn: Coastal Plain Oil and Gas Leasing Program EIS
222 West 7th Ave. #13
Anchorage, Alaska 99513
Blm_ak_coastalplain_EIS@blm.gov

Dear Ms. Hayes:

On behalf of our millions of members across the country, we the undersigned are using our voice to call for protection of the coastal plain of the Arctic National Wildlife Refuge in Alaska and to call attention to the grave deficiencies of the Bureau of Land Management’s Draft Environmental Impact Statement (EIS) for an oil and gas leasing program for the coastal plain. Our businesses and organizations represent a broad and diverse constituency that deeply believe the Arctic Refuge deserves a robust and fair environmental review and that oil and gas activities on the Coastal Plain will cause irreparable harm to the crown jewel of our nation’s Refuge system. BLM fails to adequately analyze how oil and gas development would harm polar bears, subsistence, water resources, and caribou.

The draft EIS is so deficient that it must be substantially revised and reissued for public review and comment. The rushed process that the agency is pursuing is incompatible with protecting the subsistence needs of the Gwich’in people and the fragile environment of the coastal plain.

The coastal plain is a sacred landscape to the Gwich’in people who are culturally and spiritually connected to the Porcupine caribou herd and depend on the caribou for sustenance. Hundreds of thousands of caribou migrate to the coastal plain every year to calve and rear newborns on the nutrient-rich grounds. Despite acknowledging that oil and gas activities may impact caribou, the BLM does not address the far-reaching effects of development on the herd and incorrectly concludes that subsistence resources for the Gwich’in will not be impacted. The cultural and spiritual importance of the coastal plain cannot be overstated, yet this entire process has cast aside the traditional knowledge and human rights of the Gwich’in.

The Arctic Refuge is home to some of the most stunning populations of wildlife in the world. In addition to the Porcupine caribou herd, polar bears, musk oxen and hundreds of species of migratory birds make their way to the coastal plain for its rich and varied ecosystems and excellent denning, nesting, and forage grounds. The Refuge supports the highest density of land denning for polar bears, as melting sea ice forces bears inland. While the BLM acknowledges the importance of the coastal plain to wildlife, the draft EIS lacks sufficient analysis on the extent of impacts oil and gas activities would have on the animals that depend on the Refuge.

Nowhere are the impacts of climate change felt more acutely than the Arctic, which is warming at more than double the rate of the rest of the country. As villages erode, permafrost melt weakens infrastructure, and food sources disappear, the draft EIS fails to assess how expanding fossil fuel development could exacerbate the impacts of climate change already at the front door of Arctic communities.

The coastal plain of the Arctic National Wildlife Refuge is one of our nation’s most iconic wild areas and it deserves the most stringent levels of environmental review and analysis. Yet from the very beginning, the rush to lease the Refuge has come at the expense of protecting the values that make the Arctic Refuge so special. The draft EIS analysis is deficient. It does not contain the required analysis nor the necessary mitigation measures to protect the values and resources of the coastal plain. We are confident that a thorough and robust review of the impacts of oil and gas activities would demonstrate that an oil and gas
program is simply incompatible and inconsistent with protecting wildlife, habitat, subsistence, and the human rights of the Gwich’in. We cannot allow this process to continue and risk all the Refuge has to offer.

ALASKA
Gwich’in Steering Committee
Arctic Wild
Alaska Wildlife Alliance
Collin Tyler Photography
Eyak Preservation Council
Audubon Alaska
Trinity Cares, Inc.
Friends of Alaska National Wildlife Refuges
Gustavus Inn
Hugh Rose Photography
Kodiak Island Brewing Co
Northern Alaska Environmental Center
Arctic Audubon Society

ARIZONA
Northern Arizona Audubon Society

ARKANSAS
Audubon Society of Central Arkansas

CALIFORNIA
Klamath Forest Alliance
Environmental Protection Information Center
Los Padres ForestWatch
Californians for Western Wilderness
Tri-City Ecology Center
Sea and Sage Audubon Society
Mt. Diablo Audubon Society
Ponoma Valley Audubon
Buena Vista Audubon Society
CSL Redding
Conservation Congress
Wintu Audubon Society
Sonoma Ecology Center
Ecology Center of Southern California
Northcoast Environmental Center
Sale Alternatives for our Forest Environment
Central Sierra Audubon Society
Kern Audubon Society
Napa-Solano Audubon Society
Berkeley Law Environmental Law Society
San Diego Audubon Society

COLORADO
Conejos Clean Water
Grand Junction CO Broadband for Great Old Broads
Sheep Mountain Alliance
Strengthen Direct Democracy
CoNPS
Roaring Fork Audubon
San Luis Valley Ecosystem Council
San Juan Citizen Alliance
Central Colorado Wilderness Coalition
Women for Wild Lands
Great Old Broads for Wilderness
Boulder Rights of Nature
Rocky Mountain Wild

FLORIDA
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All Brand Vacuums, Inc.
Southeast Volusia Audubon Society
Hundred Acre Hollows, Inc.
Seminole Audubon Society
Hernando Audubon Society
EarthEthics
Space Coast Audubon Society
Halifax River Audubon Society
Oklawaha Valley Audubon Society
Sarasota Audubon Society
Duval Audubon Society

GEORGIA
Speak out for Species
Atlanta Audubon Society

IDAHO
Idaho Sporting Congress, Inc.

ILLINOIS
Chicago Audubon Society
Lake County Audubon Society
Milkweed for Monarchs
Champaign County Audubon Society
INDIANA
South Bend-Elkhart Audubon Society
Center for Sustainable Living

IOWA
Iowa Audubon Society

KANSAS
Heart of America Flyfishers
Sperry-Galligar Audubon Society

MASSACHUSETTS
Saunders Hotel Group
RESTORE: The North Woods
EcoLogical Solutions

MAINE
Design Chocolates
Coyote Graphics
Natural Resource Council of Maine

MARYLAND
Nuclear Information and Resource Center

MICHIGAN
Strassman Family Association
8,000 Holes Music Production
Dwight Lydell Chapter, Izaak Walton League of Michigan

MINNESOTA
Climate Generation: A Will Steger Legacy
Mankato Area Environmentalists
Walter J. Breckenridge Chapter, Izaak Walton League
Izak Walton League of America, Minnesota Division
Save Our Sky Blue Waters
Kids for Saving Earth
Cass County Chapter, Izaak Walton League
Zumbro Valley Audubon
Women Observing Wildlife

MISSISSIPPI
EasilyEco
Okatibbee Creek Audubon Society

MISSOURI
Great Ozarks Audubon Society
St. Louis Audubon Society
MONTANA
WildWest Institute

NORTH CAROLINA
American Canoe Association
Cape Fear Audubon Society
Wake Audubon Society
Mecklenburg Audubon Society
New Hope Audubon Society

NEBRASKA
Audubon Society of Omaha
Wachiska Audubon Society

NEW JERSEY
Washington Crossing Audubon Society
Bergen County Audubon Society

NEW HAMPSHIRE
Eric McLaughlin Enterprises

NEW YORK
Nego Gato, Inc.
People for Animal Rights, Inc.
Eastern Long Island Audubon Society
Northern Catskills Audubon Society
South Shore Audubon Society
Nassau Hiking and Outdoor Club
Saw Mill River Audubon Society

OHIO
Greater Akron Audubon Society
Headwaters Chapter, Izaak Walton League
Canton Audubon Society
Black River Audubon Society

OKLAHOMA
Tulsa Audubon Society

OREGON
Soul River, Inc.
Great Old Broads for Wilderness, Cascade Volcanoes Chapter

PENNSYLVANIA
Wild for Salmon
Wonder Star Christmas Shop, LLC
Pennsylvania Council of Churches
PennFuture
Bucks County Audubon Society

TENNESSEE
Cumberland-Harpath Audubon Society

TEXAS
Golden Triangle Audubon Society
Forth Worth Audubon Society
Travis Audubon Society

VERMONT
Ascutney Mountain Audubon Society

WASHINGTON
Perpetual Motion NW
Lower Columbia Basin Audubon Society
Ridges to Rivers Open Space Network
Skagit Audubon Society
North Cascades Audubon Society
Braided River
Bainbridge Beach Naturalists

WASHINGTON DC
Tabard Corporation
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NATIONAL PARTNERS
Alaska Wilderness League
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Nature Abounds
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Born Free USA
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Natural Resources Defense Council