

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](mailto: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  
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Eyak Preservation Council  
Audubon Alaska  
Trinity Cares, Inc.  
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Ponoma Valley Audubon  
Buena Vista Audubon Society  
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Sonoma Ecology Center  
Ecology Center of Southern California  
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Sale Alternatives for our Forest Environment  
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Grand Junction CO Broadband for Great Old Broads  
Sheep Mountain Alliance  
Strengthen Direct Democracy  
CoNPS  
Roaring Fork Audubon  
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San Juan Citizen Alliance  
Central Colorado Wilderness Coalition  
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Idaho Sporting Congress, Inc.

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Milkweed for Monarchs  
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RESTORE: The North Woods  
EcoLogical Solutions

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Coyote Graphics  
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**MARYLAND**

Nuclear Information and Resource Center

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Kids for Saving Earth  
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Forth Worth Audubon Society  
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Skagit Audubon Society  
North Cascades Audubon Society  
Braided River  
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Tabard Corporation  
Heartwood

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Environment America  
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Natural Resources Defense Council