

December 9, 2020

I oppose the sale of the Coastal Plain Alaska Oil and Gas Lease Sale, for the following reasons. More gas and oil extraction are not necessary for the security and preservation of our economy. NY State has just pulled out of all gas/oil investments for the State because prices are falling as we transition from a fossil fuel economy. Now there is a rush to the production of plastics from oil which is not in the best interests of anyone due to the everlasting residues which pollute the seas, and our landfills.

Further, after centuries of the Gwich'in peoples of Alaska living in this area and respectfully following the caribou, the use of this land for oil/gas production will interrupt the migration and life cycle of this tradition. Their rights to this land and their food security is every bit as important as any economic benefit to the subsidized gas/oil industry.

The BLM did no new analysis of how much water is actually available on the Coastal Plain in the Environmental Impact Statement, and therefore does an insufficient job of analyzing impact to that water quality. One of the original purposes of the Arctic National Wildlife Refuge as established in ANILCA is to ensure "water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats.

Many of our mainland USA coastal birds nest in these areas and there has been no regard for what this sale will make upon this part of our ecosystem. The toxins left behind by oil/gas exploration, and the methane leaks will further damage the very sensitive northern environment which does not rebound from this kind of pollution.

The damage to one of our last pristine environments should only be considered if the oil/gas from this area can be proven to be absolutely essential to our country. At this time, there is a glut of oil/gas, oil/gas prices are the lowest they have been for several decades, and we are not only oil/gas independent of the rest of the world we are selling this resource overseas. We should not make companies rich by selling one of our last remaining wildernesses that provides a home for polar bears, birds, and the ecology that keeps them going.

Respectfully

Michelle Scott, MA, RD
Dept of Biology
Manchester Community College
1011 Front Street
Manchester, NH 03010

Northern
Alaska
Environmental
Center

Dear BLM,

Please protect the Arctic Wildlife Refuge from oil drilling. This is a social justice issue for the Gwich'in people in NE Alaska and NW Canada.

The Arctic Coastal Plain is the calving area for the Porcupine caribou herd—which the Gwich'in people depend on for their primary food source—besides preservation of their culture. It's not like they can go to the store and buy beef or chicken—if they don't have caribou... They live in a primarily barter economy with few cash jobs—and most without running water. Most community stores have less food than several well-stocked pantries in most American neighborhoods. Hunting, hauling firewood and water are the main jobs for most people—in addition to keeping the fire going with a pot of caribou stew and tea water on the wood stove. They also have wonderful traditions, a sense of caring for each other and the land-

We need to protect the caribou that the Gwich'in people depend on for their very survival—with protection of the caribou calving ground, the narrow band of Arctic coastal plain that is part of the Arctic Wildlife Refuge.

Thanks.

Ellen Americus

207 south 2nd street

Po box 802

Cordova, AK 99574]

I am responding to the Call for Nominations and Comments for the Coastal Plain Alaska Oil and Gas Lease Sale.

As I write, full oil tankers sit idled in ports around the world. The price of oil has dropped dramatically as the demand for oil has also dropped. Every single major bank has indicated that it will not lend to ANWR drilling projects, in large part because this devastating use of the land has no meaningful future financial benefit.

Climate change impact of drilling will be significant at a time when oceans are rising and coastal people are threatened everywhere, including significant population centers in the US. The BLM analysis dramatically underestimates the carbon emissions from drilling in ANWR. The numbers released by the BLM are highly misleading. It is estimated that burning the oil produced from ANWR would result in pollution equivalent to 16 coal-fired power plants. The risk of oil spills is very real and in fact highly probable. This is not a risk, it is a certainty. As a taxpayer, I have zero interest in paying for mitigation of the certain environmental impacts of drilling at ANWR, from rising sea level to oil spill mitigation.

Many animals depend on the ANWR land for their breeding grounds, their food, and migration paths. Disruption on the scale proposed by the administration would severely and adversely impact the caribou, polar bears, and migrating birds. We are already responsible for the extinction of so many species. It is wrong to contribute further to extinctions.

Finally, the indigenous people of the area depend on ANWR for their entire livelihoods and cultural traditions. The BLM disregards its own finding that the Porcupine caribou herd would be adversely affected by drilling in the Refuge, while acknowledging that this herd is essential for the continued subsistence of the Gwich'in people. This unnecessary project would devastate a people whose ancestors lived in this area for over 10,000 years, as the archaeological record amply demonstrates. Our European ancestors have only been here for a few hundred years.

The BLM has failed to follow the processes outlined for such projects, rushing forward in the last hours of the current administration to take action which would permanently destroy this land. Future generations of people and wildlife will be devastated. We have no foreseeable need for that oil and no right to deny a spectacular and important wildlife refuge to the local residents and to future generations in order to enrich a handful of extraction executives.

Sincerely,

Cheryl Marceau

10 Cleveland St.

Arlington, MA 02474

12-9-2020

To those with power over our public lands and water:

We are opposed to the Trump administration's plan to open the Arctic National Wildlife Refuge's coastal plain for industry to bid on oil and gas lease sales, plans to allow seismic testing, and the waiving of several safety requirements for offshore drilling in the arctic.

1. Carbon based energy sources are changing our climate in ways that will be devastating and a threat to national security, our food security and public health.

The U.S. military knows this and so do our civilian leaders. To actively encourage the harvesting of oil and gas is undermining our national interests and wellbeing.

2. The oil and gas from the Arctic are NOT needed now. There is NO compelling national interest to offer up publicly owned resources for a "fire sale" as an defeated administration leaves office.

3. There is NO scientific evidence to support any benefit that OUTWEIGHS the HARMS to our public land, welfare, security and climate future.

4. There is scientific evidence that more likely than not harm to climate, wildlife, water, and public good will results from this scheme.

5. The proposed sales by those public servants, public employees, "stewards" of public lands violate the directive to serve the public good, a legal duty to care and a moral duty to consider the welfare of indigenous people, wildlife and future generations. This proposal os emblematic of a "government" unhinged from the purpose of its existence.

6. Due to low market prices, oil and gas leases sold at this time will NOT yield a return on taxpayer assets that they have a right to expect if sacrificing irreplaceable wilderness. A bad deal for taxpayers--another great for oil corporations who have corrupted our democracy and are destroying our planet.

7. Energy conservation would more than compensate for any oil and gas derived from the Arctic, at a lower cost and with the BENEFIT of not harming the planet, wildlife or future generations.

Beth & Alex Sirr

1290 Story Mill Rd

Bozeman, MT 59715

406-451-4525

To whom it may concern:

I am writing to express my opposition of lease sales on the coastal plains in Alaska to the oil and gas industry. These lands, otherwise called Iizhik Gwats'an Gwandaii Goodlit by the Gwich'in people native to the area, are precious representations of the areas we need to be protecting not exploiting. We have reached a time in our environmental and social crises where the status quo should no longer be tolerated. The extractive practices of the oil and gas industries both decimate local ecosystems as well as impact our global climate, I feel like this is common knowledge at this point. The Draft EIS is wholly inadequate in its scope and assessment of the permanent negative impact oil drilling would cause in this area. It is our moral, ethical, and just plain human obligation to protect these lands and the species that call it home. If this fact alone isn't enough, here is a list of obvious reasons:

This precious ecosystem is home to the Porcupine Caribou herd, musk oxen, wolves, polar bears, and nearly 200 species of migratory birds. Eco-systems operate as whole systems built on millions of years of development. Oil and gas practices require disruption beyond the capacity of these ecosystems to adjust. The water use, the methane gas production, the noise, and the risk alone of potential leaks is enough to make it clear that this should not be allowed. Leasing out even a small portion of the land would create imbalances that could cause irreparable damage to the whole system. Each tract of land up for consideration has specific value as habitat for specific species within the larger ecosystem.

The people of the area are dependent on this ecosystem for sustaining not only a living, but themselves. Beyond just physical needs, this land is sacred to them. Their way of living and stewarding the land should be a source of inspiration, not an opportunity to exploit the land. The people rely specifically on the caribou herd that uses these areas for calving and post-calving habitats. Their sacred connection to the land guides them to support the preservation of the area.

In my opinion, it should take 0 months to determine that the above reasons alone are enough to protect these lands. But only 5 months were taken to determine that the damage that could be caused to these areas is worth it. A couple of things this inadequate report failed to address:

The report did not take into account the migratory birds that rely on the area to breed, forage, and molt. These birds come from every continent, meaning the impact of this drilling would impact every continent. There is no assessment of the water quantity required for these exploits nor the impact this water use would have on the area. The refuge was created to specifically ensure that this water was protected to

conserve fish, wildlife, and habitats.

Again, this is not an exhaustive list of the reasons that the BLM should not allow the leasing of these tracts along the coast. I am sitting here, writing from Chicago, desperately hoping that people in your position at the BLM find ways to step up and prevent the destruction of our natural world. I have come to realize that global issues are personal and can't be ignored. I implore you take these words and the words of others on this issue into consideration.

A concerned citizen of the planet,

Ashley Meyer

4506 N Malden St #323

Chicago, IL 60640

From the desk of.....Joette Storm, APR, Fellow PRSA

63214 Brightwater Dr., Bend, OR 97701

As a former public affairs officer for the BLM in Alaska, I have walked the Arctic National Wildlife Refuge myself and led a tour for the National Advisory Council. The council members saw how important the refuge is for caribou habitat and calving.

Today as a warming earth melts the permafrost, the refuge is changing. The methane released contributes to global warming. Oil exploration and drilling activities will only add to the changes and melting as they have done in Prudhoe Bay.

Because the original purpose of the Arctic National Wildlife Refuge as established in ANILCA is to ensure "water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats, all tracts should be excluded from leasing. It is my understanding the BLM did no new analysis of how much water is actually available on the Coastal Plain in the coastal plain EIS and therefore does an insufficient job of analyzing impact to that water quantity.

Thus the agency and its employees risk the credibility of their work. You take an oath to serve the people of this nation honestly and to the best of your ability. Failure to assess the water and resources is a dereliction of duty.

In addition, I wish you to consider that the land in question really belongs to the Gwich'in people. Our government has for decades appropriated Native American lands and broken promises regarding reservations. Let that practice end right here and now. The refuge is meant to be a place for subsistence activities. It must not be desecrated by oil exploration, especially at the time when we realize we must free ourselves of dependence on fossil fuels.

Thank you,

Joette Storm

541-306-4091

Dear BLM,

I was fortunate enough to visit the Arctic National Wildlife Refuge for a brief period last year. Although I have spent a considerable amount of time working and traveling in the beautiful state of Alaska over the last 35 years, this was my first time in ANWR and it was amazing!

Aside from the vast unspoiled beauty of the area we visited, two things stand out in my memory. After flying north over the Brooks Range and into ANWR on our first day, we saw hundreds of paths running up the valley, along the hills and even along ridgetops. Those paths were game trails etched into the tundra by generations of caribou traveling north to their calving grounds, and then south again to wintering grounds for thousands of years.

The second thing I remember are several areas where the caribou trails were interrupted by landslides and slumps. The underlying permafrost was melting away and large swaths of tundra were washing down the hillsides in rivers of mud!

Those areas of melting permafrost are just one more sign of the on-going threat our planet faces from climate change and just the beginning of the damage that will be done to ANWR. When preparing the Environmental Impact Statement, considering the possibility of drilling for oil in ANWR, the impact of continued oil and gas development on climate change was obviously not taken into consideration. In a time when we must turn away from burning fossil fuels, in an attempt to slow climate change, we should definitely not allow oil drilling in ANWR.

Please do not allow oil exploration and drilling to desecrate ANWR, without proper consideration of the detrimental impacts (both immediate and future) on the environment, the amazing variety of wildlife (including caribou and endangered polar bears) and of course the Inupiat and Gwich'in people that have lived in this area since humans first crossed the Bering Land Bridge thousands of years ago! Please do what's right for future generations, what's right for the future of this planet! Please do not open ANWR to oil exploration and drilling!

James Thomason

3614 NE 117th St.

Seattle, WA 98125

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jrthomason.2@gmail.com

To the BLM: I'm writing in opposition to the Plan to Lease all tracts on the coastal plain of the Arctic Refuge.

There was insufficient research and public comment in the planning phase of the EIS.

Human rights for Indigenous people is not being fully considered. The indigenous Gwich'in people rely on this land for their food security and regard it as sacred land.

Impacts on caribou and their necessary calving and maturation period is not addressed, while neither are you addressing the polar bear and migratory birds' needs for this specialized habitat.

Warming in the Arctic occurs at 2X the rate for the rest of the country and the EIS is not taking the severity of climate disruption into account.

No new analysis by the BLM has looked at and documented the availability of water in the coastal plain; making it impossible to gauge the impact of oil and gas leasing on not only the quantity of the water supply, but the impact on water quality, as well.

And the BLM has not adequately documented the possible full effects to the migratory birds who arrive from every continent on earth. They rely on this perfect habitat to breed, forage and stay through molting.

Please consider the long-term consequences of pollution by noise, to the water and air that would affect one of the most pristine places on this planet. We see how our reckless behavior (often because we didn't yet know enough to understand the questions we needed to ask and answer) is poisoning our supplies on the rest of the planet. This is a key decision about to be made and I'd like to see it questioned more thoroughly by looking into the long-term effects of a non-sustainable, highly polluting venture, rather than considering only the immediate, unsustainable yield to which we've become accustomed. Please use your capability to reach out to the public and use scientific methods to study the real effects that will be carried into the future. Thank you

Sincerely

**Bettyann Kolner 17001 Rd. 24 Dolores Colo. 81323
970 676 1217**

I am writing to express my opposition to leasing oil and gas rights in the Arctic National Wildlife Refuge. Leasing in a protected area will put short term environmentally destructive profits above the many cultural and environmental reasons for protecting the Arctic Wildlife Refuge.

In this time of racial reckoning in our country, Bureau of Land Management has an opportunity to protect this area which is a vital spiritual home to the indigenous Gwich'in people. I encourage you to do the right thing and not put their traditional land and environmental resources at risk due to development. The area is critical habitat for migratory birds and iconic species like polar bears and caribou.

Surely it is time for the United States Government to move away from fossil fuels due to their proven contribution to climate change! Leasing in the Arctic National Wildlife Refuge is ill advised and leasing should not go forward.

Donna Raynalds
1704 SE Harold St.
Portland, OR 97202
503-313-9625

I am writing in opposition to any drilling, drilling exploration, or development within the boundaries of the Arctic National Wildlife Refuge. These lands are a special treasure whose value as an untouched place of refuge far outweighs its value as a place to exploit for possible natural 'resources'. There is so much to lose, and so very little to gain by disturbing this remote place. Our nation has already designated many, many acres of land to disturb, perhaps destroy, in our endless search for oil. This place deserves our most thoughtful stewardship.

Please consider that once it is gone, it is gone forever. Surely we are not a nation so poor as to destroy what little pristine wilderness we have managed to preserve.

"I hope the United States of America is not so rich that she can afford to let these wildernesses pass by. Or so poor, she cannot afford to keep them."- Mardie Murie

Please conserve this legacy for all of those yet to come.

Theresa Lundquist
fancyplants@wyoming.com

"The wilderness holds answers to questions man has not yet learned to ask."

- Nancy Newhall

To the Bureau of Land Management,

I respectfully request that you do not sell oil and gas leases for any of the coastal plains parcels in the Arctic National Wildlife Refuge.

This is not the place for that, for the following reasons:

The Gwich'in people consider the coastal plain as sacred, and it is vital to their human rights and food security. The Gwich'in are spiritually connected to the Porcupine caribou herd, and this area is the calving and post-calving habitat of that herd.

The original purpose of ANWR as established by ANILCA is to ensure "Water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats. The BLM conducted no new analysis of how much water is actually available on the Coastal Plain in the Coastal Plain EIS, and therefore is doing an inadequate job of analyzing impact to that water quality.

The coastal plain is habitat to millions of birds which migrate from every continent to breed, forage and molt in ANWR. Oil leasing on the coastal plain would negatively impact millions of birds.

Finally, oil and gas are part of a dying industry. Renewable energy is surpassing oil and gas in terms of cost effectiveness, as evidenced by New York State's recent decision to divest its pension fund from all oil and gas investments. Without heavy governmental subsidies (which includes opening ANWR to extraction) the oil industry is not economically viable. As our presidential administration changes, it is highly likely that subsidies for oil and gas at all levels will continue to decrease. This is NOT the time to trash our public lands and crucial arctic habitat for profit-driven oil and gas extraction.

I live in Colorado, and have never visited ANWR. I do not need to visit in order to understand this Reserve's need for protection.

Thank you for your careful consideration of my comments.

Sincerely,

Cathy Cowles

Cathy Cowles

Nonprofit Consultant, Instructor and Adventurer

Pronouns: she/her

**State Director, Bureau of Land Management
Alaska State Office,
222 West 7th Avenue, Mailstop 13
Anchorage, AK 99513-7504.**

Dear State Director,

We as a Nation and inhabitants of this planet must change our actions in order to mitigate the climate changing path we are running down. Drilling our wilderness is clearly not the answer for our plant or for the Indigenous people that call these lands home.

The recent "call for nominations" for leasing in the Arctic National Wildlife Refuge, issued Nov. 17, presents numerous problems that require further analysis. The Arctic Refuge is one of the last truly untouched wildernesses of North America. Drilling in the Refuge will be remembered as one of the great environmental tragedies of the 21st century, as well as a violation of the most basic human rights of the Gwich'in people.

Every single tract that is under consideration for leasing contains sensitive habitat and resources that would be threatened by drilling. This includes habitat for threatened polar bears, countless bird species, and the Porcupine caribou herd, which the Gwich'in people rely on for their subsistence and culture. This rushed process has ignored concerns about threats to the Gwich'in people, threatened wildlife, and our climate.

Sincerely,
**Debra Young
24 McCatharn Rd.
Lebanon NJ 08833**

RE: ANWR-Artic Refuge Public Comment

To Whom It May Concern:

I am opposed to all oil and gas leases for all tracts on the coastal plain in ANWAR for the following reasons:

1. The likelihood of serious environmental depredation to habitat, wildlife and the native, Gwich'in people far outweigh any possible benefit to our country.
2. There is no pressing need to extract more oil and gas at a time when alternative sources of energy are increasingly meeting our needs. At most, the ANWR should be considered a reserve supply should the need ever arise.
3. Our world is experiencing global climate change that threatens our very existence. Concurrently, our natural and pristine lands that purify our atmosphere are increasingly disappearing to development and agriculture.
4. Having grown up in North Dakota, I have witnessed the devastation to the environment after repeated boom and bust oil and gas development over the decades. We must not let this happen to one of our few remaining natural treasures.

Regards,

Joel Sorum

7388 Cedar Meadows Lane

Shingletown, Ca. 96088

joelsorum@gmail.com

To whom it may concern,

I oppose oil and gas leasing on all tracts on the coastal plain in ANWR for the reasons specified below:

The Gwich'in peoples of Alaska and Canada are culturally and spiritually connected to the Porcupine caribou herd, which relies on the Coastal Plain for calving and post-calving habitat. The Gwich'in consider the coastal plain as sacred, and the place where life begins. It is vital to their human rights and food security.

Further, I consider it to be a moral imperative to consider the original intent of ANILCA, under which ANWR's Federal land management status was solidified. Recent thoughts from Alaska Native leaders on ANILCA's 40th Anniversary place this legislation in context, and speak directly to the proposed oil and gas leases within ANWR: "Looking back at ANILCA on its 40th anniversary, we see a compromise imposed on Alaska Native people that doesn't meet Congress's intent of fully protecting Alaska Natives' right to continue their traditional way of life. ANILCA is burdened with many-layered rules and regulations that need to be swept away. The fundamental human right for Alaska Native people to subsist and maintain their cultures must be strengthened by federal law." ~Julie Kitka, Alaska Federation of Natives President; "We cannot be separated from who we are as Native peoples, our ways of life are tied to the land so intricately that separation means death. That is the result of the current system. It's time for this to be addressed and ANILCA to be centered on Native management and stewardship." ~President Liz La quen náay Medicine Crow of First Alaskans Institute; "Today, we remind Congress and the State of Alaska of the promise made in the passage of ANCSA, to take any action necessary to protect the hunting and fishing needs of Native people, and we stand together, 40 years after the passage to proclaim for the record, Title VIII of ANILCA must be replaced by language to protect Alaska Native hunting and fishing rights and further Alaska Native self-governance in the management of Alaska's resources." ~Chief PJ Simon of Tanana Chiefs Conference.

Expanding oil and gas development in the Arctic will further exacerbate climate adaptation and mitigation challenges in an Arctic that is warming at twice the rate of the rest of the country. The EIS for oil and gas leasing on the coastal plain downplays unacceptable climate impacts of extraction in the Arctic.

An original purpose of the Arctic National Wildlife Refuge as established in ANILCA is to ensure "water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats. The BLM did no new analysis of how much water is actually available on the Coastal Plain in the coastal plain EIS and therefore does an insufficient job of analyzing impact to that water quantity.

The coastal plain is habitat for millions of birds which come from every continent, including off the coast of Antarctica, to breed, forage, and molt. BLM is disregarding impacts to birds by planning oil leases in the Arctic Refuge.

Regards,

Caleb Billmeier

Wellspring Group Consulting (www.wellspringalaska.com)

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Seldovia, AK 99663

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Dear Director Padgett:

My family and I are vehemently opposed to the leasing of any and all of the proposed Alaska Coastal Plain oil and gas lease tracts. Climate change is already causing irreparable damage in the Arctic, at two times the rate in other regions of the Earth. Expanding oil and gas development in the Arctic will further exacerbate climate adaptation and mitigation challenges presently faced by its humans, wildlife and ecosystems. The Environmental Impact Statement for oil and gas leasing on the coastal plain trivializes climate impacts of extraction in the Arctic.

The Arctic contains richly diverse plant and animal life, and is critically important as a "nursery" for many animals including caribou, polar bears, and migratory birds. The Gwich'in peoples of Alaska also hold this place sacred, as the place where life begins. For all its complexity, the Arctic is a fragile place. The Bureau of Land Management has disregarded the impact that oil and gas exploration, located as the tracts are directly on the Arctic coastal plain, would have on migratory bird life. The Gwich'in peoples' traditional way of life would also be essentially ended if oil and gas leasing and exploration were allowed to occur on any of the Alaska Coastal Plain tracts.

The Arctic National Wildlife Refuge (ANWR) is one of the very last pristine wilderness areas in the world. Human rights to a traditional way of life are more important than a few barrels of oil, most likely to be sold to countries outside the U.S. Preserving biological diversity and a stable ecosystem that is able to respond to the inevitable challenges of climate change is much more important than a few more dollars in the pockets of politicians and corporate C.E.O.s.

Please, step back and conduct a rigorous EIS for the entire Alaska Coastal Plain lease tract project. You have a moral obligation, given that ANWR belongs to all of the American people, to consider all available scientific evidence. The evidence will point to the fact that you have NO business opening ANWR's Coastal Plain up for lease, and NO business to allow oil and gas exploration in this unique and irreplaceable area.

Thank you.

Sincerely,

Mina Doerner, Ester, Alaska 99725

To whom it may concern,

I oppose oil and gas leasing on all tracts on the coastal plain in ANWR for the reasons specified below:

The Gwich'in peoples of Alaska and Canada are culturally and spiritually connected to the Porcupine caribou herd, which relies on the Coastal Plain for calving and post-calving habitat. The Gwich'in consider the coastal plain as sacred, and the place where life begins. It is vital to their human rights and food security.

Expanding oil and gas development in the Arctic will further exacerbate climate adaptation and mitigation challenges in an Arctic that is warming at twice the rate of the rest of the country. The EIS for oil and gas leasing on the coastal plain downplays unacceptable climate impacts of extraction in the Arctic.

An original purpose of the Arctic National Wildlife Refuge as established in ANILCA is to ensure "water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats. The BLM did no new analysis of how much water is actually available on the Coastal Plain in the coastal plain EIS and therefore does an insufficient job of analyzing impact to that water quantity.

The coastal plain is habitat for millions of birds which come from every continent, including off the coast of Antarctica, to breed, forage, and molt. BLM is disregarding impacts to birds by planning oil leases in the Arctic Refuge.

Regards,

Micah Sorum

3358 18th St NW

Washington DC 20010

sorummk@gmail.com

To Whom It May Concern,

I am writing to express my opposition to leasing all tracts on the Arctic National Wildlife Refuge coastal plain. I oppose leasing all tracts because of the negative effects that oil lease would have on the human rights of Arctic Indigenous peoples, climate impacts, and impacts on caribou, polar bears, and migratory birds. Furthermore, there were insufficient Environmental Impact Statements in the planning phase.

The Gwich'in peoples of Alaska and Canada are culturally and spiritually connected to the Porcupine caribou herd, which relies on the Coastal Plain for calving and post-calving habitat. The Gwich'in consider the coastal plain as sacred, and the place where life begins. It is vital to their human rights and food security.

Expanding oil and gas development in the Arctic will further exacerbate climate adaptation and mitigation challenges in an Arctic that is warming at twice the rate of the rest of the country. The EIS for oil and gas leasing on the coastal plain downplays unacceptable climate impacts of extraction in the Arctic.

Furthermore, our society needs to transition away from dependence on fossil fuels at this time. Drilling in new areas will only increase our dependence on fossil fuels.

An original purpose of the Arctic National Wildlife Refuge as established in ANILCA is to ensure "water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats. The BLM did no new analysis of how much water is actually available on the Coastal Plain in the coastal plain EIS and therefore does an insufficient job of analyzing impact to that water quantity.

The coastal plain is habitat for millions of birds which come from every continent, including off the coast of Antarctica, to breed, forage, and molt. BLM is disregarding impacts to birds by planning oil leases in the Arctic Refuge.

Sincerely,

Rebecca Siegel

2 High School Rd

Brevig Mission AK

99785

To whom it may concern,

I strongly oppose leasing any and all tracts of land on the coastal plain. My opposition stems from the following important issues:

1) The indigenous Gwich'in peoples are culturally and spiritually connected to the Porcupine caribou herd, which depends on the Coastal Plain for calving and post-calving habitat. The coastal plain is vital to their human rights and food security.

2) The Arctic faces more highly acute problems from a changing climate and the Arctic tundra contains a fragile ecosystem at risk from a warming Earth. Expanding oil and gas development in the Arctic will weaken the U.S.'s goals of carbon emission neutrality, and exacerbate climate adaptation and mitigation challenges already plaguing Alaska.

3) The BLM did no new analysis of how much water is available on the Coastal Plain in the coastal plain EIS, therefore the impacts to that water quantity and quality are unknown. This should be the first and foremost step in moving forward with any activity in the region.

4) The coastal plain is an important habitat for millions of birds which migrate from every continent. The adverse effects of drilling in the region may cause irreparable harm to bird populations which are critical globally. For example, tourism income from hunting waterfowl in North and South Dakota are dependent on Snow Goose and Canada Goose populations which nest in the Coastal Plains region. Negative effects on these species will have un-planned negative effects on economies across the US and world.

Please take my comments seriously and understand that they represent the majority of the American people. Rushing into oil exploratory actions in the region in question will be a major setback to an important indigenous persons group, will harm economies across the US, and will exacerbate the largest single threat to America's safety and stability, climate change.

Thank you for your time.

Best,

Jacob Sorum

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Golden, CO 80403

State Director, Bureau of Land Mgt.

Alaska State Office

State Director: Please register this comment in strong opposition to the lease of any and all tracts within the Coastal Plain. Unlike most citizens writing to you in opposition to this proposed development, I have actually visited and worked in the Coastal Plain over multiple years, and was one of the authors for the 1002 report back in the 1980s. I conducted bird of prey surveys then and travelled the river corridors from the Canning to the Kongakut.

When I was last in the area (1980's), vegetation scars from the seismic survey vehicles were still visible on the landscape, even though they were supposed to only traverse the area when it was both frozen and snow covered. One can only imagine the visual and physical impacts and their permanency from oil and gas development activities. This entire proposal is purely an attempt to derive short term extractive gain for the state of Alaska, which has become quite addicted to oil revenues, and to further the political careers of its senators and governor.

Development here is running counter to our national vision of reduced fossil fuel use and reduced carbon emissions. The election is over and the new administration will not support this. The hand writing on the wall is there for you to see.

Michael Amaral

retired, U.S Fish and Wildlife Biologist

5 Gould Road

Warner, NH 03278

603 456-3179

Allowing oil and gas development in the Arctic will devastate the area. Land after drilling is never the same and the impact in the Arctic Refuge Coastal Plain will take centuries to recover. The Arctic is fragile and is already warming at twice the rate of the rest of the country. The EIS for oil and gas leasing on the coastal plain downplays unacceptable climate impacts of extraction in the Arctic.

All tracts should be excluded from oil leasing, as an original purpose of the Arctic National Wildlife Refuge as established in ANILCA is to ensure "water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats. The BLM did no new analysis of how much water is actually available on the Coastal Plain in the coastal plain EIS and therefore does an insufficient job of analyzing impact to that water quantity. Please explain to me what the plan is to address this issue.

Tobias Albrigtsen

tobias.albrigtsen@gmail.com

1031 W Chena Hills Dr, Fairbanks, AK 99709

Cell: 303-928-0571

Regarding the recent “call for nominations & comments” for leasing in the Arctic National Wildlife Refuge (ANWR), issued Nov. 17:

The Arctic National Wildlife Refuge is a national treasure that is one of the last truly untouched wildernesses of North America. It belongs to all Americans and is appreciated by people all over the world. When I hiked the Appalachian Trail, visitors from Europe told me of their attraction to our wilderness areas: “Europe has history. America has nature.”

Drilling in the Refuge would be one of the greatest environmental tragedies and travesties in our history, as well as a violation of the most basic human rights of the Gwich'in people, who depend on the Porcupine caribou herd for sustenance - both physical and spiritual.

I am fortunate to have been to ANWR and seen the midnight sun across the Coastal Plain from atop the Brooks Range. I have been to Kaktovik on Barter Island, and I have also seen the devastation of development at Deadhorse.

Tundra, with its vegetation crucial to Porcupine Caribou, is far too fragile to withstand the impact of exploring for drilling for oil, even when done on snowpack. The scars from the test well drilled in 1985–86 still persist 35 years later despite attempts to mitigate damage at the time and might take millennia to recover. The weight of the equipment and vehicles compresses the tundra and leaves low-lying trenches that collect water that conducts heat and creates bogs while draining other areas. Wilderness cannot be “reclaimed.”

Every single tract that is under consideration for leasing contains sensitive habitat and resources that would be threatened by drilling. This includes habitat for threatened polar bears, countless bird species, and the Porcupine caribou herd, which the Gwich'in people rely on for their subsistence and culture. This rushed process has ignored concerns about threats to the Gwich'in people, threatened wildlife, and our climate.

Even the seismic testing used to attempt to locate possible oil reservoirs leaves scars from the vehicles used, as demonstrated just outside the border of ANWR. The impact to wildlife has not been quantified in this region.

Charles Milligan

PO Box 600

Southeast Mountain Rd

Wingdale NY 12594

+1 704 883 2711 (mobile)

State Director

Bureau of Land Management

Alaska State Office

222 West 7th Avenue, Mailstop 13

Anchorage, AK 99513-7504.

To Whom it may concern:

I have been fortunate enough to visit the Arctic National Wildlife Refuge several times. It is a magical place that is unique and rare. I want to visit again but hesitate to give Alaska my tourist dollar because of the Alaskan and United States government's repeated complicity to the fossil fuel industry.

I oppose leasing all tracks on the coastal plain of the Arctic National Wildlife Refuge to any commercial business for fossil fuel exploration and extraction for the following reasons:

- 1) Violation of the rights of Arctic Indigenous peoples.
- 2) Insufficient Environmental Impact Statements in the planning phase. 3) Insufficient consideration of climate impacts.
- 4) Negative impacts upon polar bears, caribou & migrating birds.
- 5) Insufficient consideration of recreational use of the coastal plain. 6) Insufficient consideration on the actual impacts of the land & water caused by fossil fuel exploration and extraction.

Please respect the people, wildlife and lands that call this home by protecting the reserve first by not allowing extraction to occur and also make serious consequences for corporations who damage the Refuge.

Thank you,

Victoria McOmie

6451 NE Port Drive

Lincoln City, OR 97367

torycoast@gmail.com

(503)936-4416

Bureau of Land Management

Alaska State Office

Anchorage, AK 99513-7504

To Whom this May Concern:

I write to express my opposition to the leasing of land in the Arctic Wildlife Refuge for oil and gas exploration and drilling.

I have personally visited northern Alaska and found the land pristine and beautiful.

The coastal plain of the Arctic Refuge is habitat for millions of migratory birds. BLM is disregarding the environmental impacts on these migratory birds.

The porcupine caribou herd also relies on the coastal plain in the Wildlife Refuge for calving and post calving habitat. The Gwich'in indigenous people of Alaska are culturally connected to the porcupine caribou herd and depend on the herd for food security.

The Arctic Wildlife Refuge should be protected and preserved as a Wildlife Refuge, NOT sold or leased for oil and gas drilling.

Sincerely,

Ann Chmura MD

315-789-2640

64 Maxwell Ave

Geneva, NY 14456

amrchmura@gmail.com

To whom it may concern,

I am writing to express my opposition to leasing any and all tracts on the coastal plain of the Arctic Refuge. There is no safe and reasonable place to expand exploration on the Arctic Plain. There is a long list of reasons why this project should not move forward, but here are a few of the key points: The Gwich'in peoples of Alaska and Canada are culturally and spiritually connected to the Porcupine caribou herd, which relies on the Coastal Plain for calving and post-calving habitat. The Gwich'in consider the coastal plain as sacred, and the place where life begins. It is vital to their human rights and food security. The population of the Porcupine herd has already declined; the state must work to protect this sacred region to ensure the herd survives.

Any travel of equipment in the Arctic scars the land for generations to come. It can also damage the natural path of water and pollute water sources and ground water. An original purpose of the Arctic National Wildlife Refuge as established in ANILCA is to ensure "water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats. The BLM did no new analysis of how much water is actually available on the Coastal Plain in the coastal plain EIS and therefore does an insufficient job of analyzing impact to that water quantity.

Overall, there have been insufficient Environmental Impact Studies done to explore the impact of exploration and drilling in the region. BLM does not have a clear understanding of the impact of exploration on caribou, polar bears, migratory birds, and water. Nor has there been proper research into the impact that exploration will have on the overall climate crisis. It is known that the Arctic tundra stores more carbon in its duff and soil than nearly anywhere else in the world. Releasing that carbon can exacerbate an already dire climate crisis.

Heavy equipment on the Arctic Plain can hurt and kill wildlife species that have survived millenia in that region. Polar bears, especially, are declining in population and are considered vulnerable. Their habitat will be polluted and damaged, and equipment may unknowingly crush and kill polar bears while they hibernate. As their habitat is already shrinking significantly due to climate change (e.g. sea ice melt), this vulnerable species may not withstand another major habitat decrease. Expanding oil and gas development in the Arctic will further exacerbate climate adaptation and mitigation challenges in an Arctic that is warming at twice the rate of the rest of the country. The EIS for oil and gas leasing on the coastal plain downplays unacceptable climate impacts of extraction in the Arctic.

The coastal plain is habitat for millions of birds which come from every continent, including off the coast of Antarctica, to breed, forage, and molt. BLM is disregarding impacts to birds by planning oil leases in the Arctic Refuge.

Overall, there has clearly not been enough forethought, planning, and consideration for the Native peoples, who consider that land sacred, as well as for the wildlife, nor the fragile ecosystem in general. What we do know is that opening tracts will cause irreversible damage and exacerbate climate change. For these reasons, among many others, no tracts should be open for extractive exploration on the Arctic Plain.

Thank you,

Elizabeth Furman

PO Box 6

Ester, AK 99725

(907) 987-9561

eafurman1@gmail.com

To the State Director of the Bureau of Land Management, Alaska State Office:

I am writing to express my sincere opposition to the proposed plan to lease sales on the Arctic National Wildlife Refuge's coastal plain.

The Arctic National Wildlife Refuge land and ecosystem is a treasure that must be preserved. By keeping the coastal plains protected as-is, the Federal Government plays an important role as steward, and must continue to ensure the land continues into the future as a habitat for millions of birds, calving grounds for caribou, and habitat for countless other species of wildlife that make up an essential ecosystem. The coastal plains are sacred to the Gwich'in peoples and provide food security for them via the caribou herds. The Gwich'in have a right to this land and the food sources that come from it, and erasing this food source would be a human rights violation.

Oil and gas drilling on this land will serve the short-term purpose of extracting profit and will create ripple-effect repercussions felt all over the world. The carbon locked in the ground must remain in the ground to protect us from increasingly-rapid temperature changes caused by greenhouse gas release into the atmosphere. The stewards of the land must ensure the carbon remains in the ground. Short-term profit motives must not be prioritized at a time when climate change is increasingly wreaking havoc in the form of wildfires, hurricanes, tropical storms, floods, and droughts around the world. The preservation of this land is vital to our survival as a species.

An original purpose of the Arctic National Wildlife Refuge as established in ANILCA is to ensure "water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats. The leasing of these tracts of land must not move forward. The BLM must do its job and manage this land appropriately.

Hermina Harold

To whom it may concern,

I oppose oil and gas leasing on all tracts on the coastal plain in ANWR for the reasons specified below:

The Gwich'in peoples of Alaska and Canada are culturally and spiritually connected to the Porcupine caribou herd, which relies on the Coastal Plain for calving and post-calving habitat. The Gwich'in consider the coastal plain as sacred, and the place where life begins. It is vital to their human rights and food security.

Expanding oil and gas development in the Arctic will further exacerbate climate adaptation and mitigation challenges in an Arctic that is warming at twice the rate of the rest of the country. The EIS for oil and gas leasing on the coastal plain downplays unacceptable climate impacts of extraction in the Arctic.

An original purpose of the Arctic National Wildlife Refuge as established in ANILCA is to ensure "water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats. The BLM did no new analysis of how much water is actually available on the Coastal Plain in the coastal plain EIS and therefore does an insufficient job of analyzing impact to that water quantity.

The coastal plain is habitat for millions of birds which come from every continent, including off the coast of Antarctica, to breed, forage, and molt. BLM is disregarding impacts to birds by planning oil leases in the Arctic Refuge.

Regards,

Mathew Sorum

1559 Jamboree Dr

Fairbanks, AK 99709

mathew.sorum@gmail.com

Re: Call for nominations and comments on the lease tracts considered for the upcoming Coastal Plain Oil and Gas Lease Sale

Dear State Director,

Thank you for considering my comments with regard to the leasing options being offered for the Coastal Plain Oil and Gas Lease Sale.

My primary concern about the proposed Oil and Gas Lease Sale in ANWR is that the Environmental Impact Statements in the planning phase were inadequate.

The EISs developed for the planning phase were never sufficiently robust to describe extant resources or ensure adequate protections and mitigations for the land, water and wildlife resources of the Refuge including caribou, polar bears and the many species of migrating birds that use the area. Under the current administration, BLM was never allowed either the time or resources to complete these critical EIS assessments with depth and integrity. Considering that the question of development of the Arctic National Wildlife Refuge has been under discussion and in litigation for more than 40 years, these EISs are, arguably, the most important environmental documents ever created. They must be as complete and rigorous as it is possible for them to be. The EISs under consideration in this case do not meet this standard.

Thank you for considering my thoughts on this critical issue.

Linda (Lou) Brown
2630 Home Run
Fairbanks, AK 99709
907.669.0286
loubrown1952@gmail.com

Dear BLM State Director and Staff,

I am opposed to any oil and gas lease sales in the Sacred Place where Life Begins, the Coastal Plain of the Arctic Refuge. This place is the traditional and rightful homelands of the Iñupiat and Gwich'in Peoples. The human rights of the Indigenous Peoples of the Arctic must be respected. The Gwich'in People's deep ties to the Porcupine Caribou herd, along with the thousands of other life forms there, and the waters, and lands themselves must be recognized and honored. There is no way to mitigate damage done to cultural and spiritual connections because there is no way to quantify them in the first place. Many of us feel that drilling in the Arctic Refuge would be cultural genocide.

As a water scientist, I am also deeply concerned about the lack of rigorous scientific investigation involved in the Environmental Impact Statement. The original purpose of the establishment of this sacred area as a "National Wildlife Refuge" was to ensure that there would be sufficient water quality and quantity within the area to support the plants, animals, and habitats. However, the impacts of oil and gas exploration and development on water quantity have not been adequately analyzed in the EIS.

We must also squarely address the negative, exacerbating impacts that oil and gas development in the Arctic Refuge would have on global climate change. As a 27 year-old daughter of an Exxon employee, I know it is our generation who will inherit the impacts of the mistakes of our parents. Please do the right thing now for all of us and the future generations of humans who deserve a liveable, vibrant, biodiverse planet.

Thank you for this opportunity to comment. Please listen to the people, and protect the Arctic Refuge.

Skye Steritz

Water Coordinator

Native Conservancy

cell: 936-537-4322

I oppose any exploration for oil and gas in the proposed leases. Even though I am not a United States citizen I have been fortunate to visit the area on a couple of occasions. I appreciate the significant value of the area to the long term health of the Porcupine caribou herd. This herd not only warrants protection for its own rights but also the well being of the Gwich'in people are very dependent on the herd.

As a citizen of the world I am concerned about the effects of this development will have on CO₂ emissions and temperature rise. Australia is already suffering from temperature rise and I implore all countries to reduce the amount of fossil fuel extraction and use rather than increase that this proposal would do.

In my opinion the National Arctic Wildlife Refuge is an area that is of importance to the whole world due to its environmental and cultural significance. This development will degrade that refuge irreparably.

Yours sincerely

Dr T R Brodribb
1a Nielsen Ct
Middle Ridge Qld 4350
Australia

To the Dept. of the Interior

Re: Opening Drilling on the Arctic Wildlife Refuge

11-22-20

Oil and gas lease sale tracts should not be allowed on the Arctic Wildlife Refuge. As the name "refuge" implies, this area is protected for a reason. Any drilling there is a threat to both the indigenous people who live there and the wildlife that need these lands to survive.

The United States has become the largest producers of oil in recent years. We don't need any more oil and gas. We know we only have about 10 years left to eliminate CO2 emissions to prevent catastrophic and irreversible damage to all life on earth, including humans. The signs are all around us: huge wildfires burning down entire towns, bigger than ever hurricanes that are increasing in number and power, floods, epidemic diseases that are spreading around the world.

This has to stop. We know what happens when oil and gas are drilled and fracked for. We know what happens when it is stored and transported--Deep Water Horizon, The Gulf, Exxon Valdez. Thousands of animals have died. The damage goes on and on.

Promoting oil at this point is shortsited. People are divesting from it. Technology is moving away from it. Destruction of our environment is no longer acceptable, practical, or economically sound.

Sincerely,

Carrie Parks

13009 NE 93rd St.

Vancouver, WA 98682

**State Director,
Bureau of Land Management,
Alaska State Office,
222 West 7th Avenue,
Mailstop 13,
Anchorage, AK 99513-7504**

Re: Arctic Refuge Public Comment

I am writing to express opposition to leasing of any and all tracts on the coastal plains. The Gwich'in peoples of Alaska and Canada are culturally and spiritually connected to the Porcupine caribou herd, which relies on the Coastal Plain for calving and post-calving habitat. The Gwich'in consider the coastal plain as sacred, and the place where life begins. It is vital to their human rights and food security. Expanding oil and gas development in the Arctic will further exacerbate climate adaptation and mitigation challenges in an Arctic that is warming at twice the rate of the rest of the country. The EIS for oil and gas leasing on the coastal plain downplays unacceptable climate impacts of extraction in the Arctic. An original purpose of the Arctic National Wildlife Refuge as established in ANILCA is to ensure "water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats. The BLM did no new analysis of how much water is actually available on the Coastal Plain in the coastal plain EIS and therefore does an insufficient job of analyzing impact to that water quantity. The coastal plain is habitat for millions of birds which come from every continent, including off the coast of Antarctica, to breed, forage, and molt. BLM is disregarding impacts to birds by planning oil leases in the Arctic Refuge.

**Sincerely,
Bonnie Gestring,
140 south 4th St. West,
Missoula, MT 59801**

I can not believe that this fight still goes on. Ever since I was a Nature Resource major in college in the late 1970's, I have been opposing drilling in the Arctic National Wildlife Refuge. Fifty years of oil drilling and spilling all over the world - one environmental disaster after another has not been enough to overcome the appalling greed. The Earth is out of options. We have drilled and striped and mined and fracked and logged to the point of no return for our air and water and wildlife. When does it become apparent that you can't breathe and drink your money.

I oppose these leases for the following reasons:

Expanding oil and gas development in the Arctic will further exacerbate climate change and mitigation challenges in an Arctic that is warming at twice the rate of the rest of the country. The Environmental Impact Statement for oil and gas leasing on the coastal plain downplays unacceptable climate impacts of extraction in the Arctic.

An original purpose of the Arctic National Wildlife Refuge as established in ANILCA is to ensure "water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats. The BLM did no new analysis of how much water is actually available on the Coastal Plain in the coastal plain EIS and therefore does an insufficient job of analyzing impact to that water quantity.

The coastal plain is habitat for millions of birds which come from every continent, including off the coast of Antarctica, to breed, forage, and molt. BLM is disregarding impacts to birds by planning oil leases in the Arctic Refuge.

As a 31 year Department of the Interior employee, I am disgusted that this leasing proposal has been submitted yet again. There used to be people of integrity that worked in Interior. No longer.

Pam Griffin

To whom it may concern in charge of accepting Public Comments on the proposed leasing of any or all of the Arctic Refuge:

I am writing with my comments against any leasing of all or any portion of the Arctic National Wildlife Refuge. Here are my concerns:

The Gwich'in peoples of Alaska and Canada are culturally and spiritually connected to the Porcupine caribou herd, which relies on the Coastal Plain for calving and post-calving habitat. The Gwich'in consider the coastal plain as sacred, and the place where life begins. It is vital to their human rights and food security.

Expanding oil and gas development in the Arctic will further exacerbate both climate adaptation and mitigation challenges in an Arctic that is warming at twice the rate of the rest of the country.

The EIS for oil and gas leasing on the coastal plain downplays unacceptable climate impacts of fossil fuel extraction in the Arctic, and must be redone in its entirety.

An original purpose of the Arctic National Wildlife Refuge as established in ANILCA is to ensure "water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats. The BLM did no new analysis of how much water is actually available on the Coastal Plain in the coastal plain EIS and therefore does an insufficient job of analyzing impact to that water quantity.

The coastal plain is habitat for millions of birds which come from every continent, including off the coast of Antarctica, to breed, forage, and molt. BLM is disregarding impacts to birds by planning oil leases in the Arctic Refuge.

For all of these reasons, the leasing program must be stopped in its entirety.

I have backpacked twice in the Arctic Refuge, and believe that it is an irreplaceable treasure for our country and the world. Please stop this leasing program in its entirety.

Sincerely,

Amy Mower

PO Box 2004

Maple Falls, WA

98266

Dear BLM,

I am writing concerning the proposed oil and gas lease sale in the Arctic National Wildlife Refuge. I have spend many days over the past 30 years in the Arctic Refuge as a professional river guide, outfitter and wilderness enthusiast. It is dear to my heart and dear to countless others who value these last remaining wild undisturbed places. The Arctic Refuge represents one of the last great wilderness areas in the world. The extremely important coastal plain supports the birthing grounds of a migrating caribou herd and myriad nesting and migrating birds from around the world. These are sacred and fragile environments and the short sighted attempt by the present administration in Washington to rush through these oil and gas lease sales again after decades of attempts should be denied. I implore the BLM to listen to the will of the American people, who have weighed in over the last several decades of debate on the fate of the Refuge, who do not support development in the Refuge. You can not recreate wilderness of this vast a nature once you destroy it. It is gone forever.

No to oil and gas lease sales in the Arctic Refuge!

Juliette Boselli

P.O. Box 106

Denali, AK. 99755

julietteboselli@yahoo.com

Concerning the proposed leasing of the ANWR, I must raise these concerns and express that I do not support the development:

Expanding oil and gas development in the Arctic will further exacerbate climate adaptation and mitigation challenges in an Arctic that is warming at twice the rate of the rest of the country.

The EIS for oil and gas leasing on the coastal plain downplays unacceptable climate impacts of extraction in the Arctic.

An original purpose of the Arctic National Wildlife Refuge as established in ANILCA is to ensure “water quality and necessary water quantity within the refuge” to conserve fish, wildlife and habitats. The BLM did no new analysis of how much water is actually available on the Coastal Plain in the coastal plain EIS and therefore does an insufficient job of analyzing impact to that water quantity.

The coastal plain is habitat for millions of birds which come from every continent including off the coast of Antarctica to breed, forage, and molt. BLM is disregarding impacts to birds by planning oil leases in the Arctic Refuge.

The Gwich'in peoples of Alaska and Canada are culturally and spiritually connected to the Porcupine caribou herd, which relies on the Coastal Plain for calving and post-calving habitat. The Gwich'in consider the coastal plain as sacred and the place where life begins. It is vital to their human rights and food security.

In conclusion, this plan to develop these lands has not had the proper studies done to assess its impact, both long term and immediate.

Duke George Brady
P.O. Box 8794,
Houston TX 77249
3604025384

Dear BLM Director,

I am contacting you to express my opposition to leasing all tracts on the Alaska coastal plain.

I base my opposition on the defense of the human rights of Arctic Indigenous peoples, on the insufficient environmental impact statements in the planning phase, on the climate impacts of the proposed leases, on the impact on fauna and flora of Alaska, e.g., on caribou, polar bears and migratory birds, and more.

The Gwich'in peoples of Alaska and Canada are culturally and spiritually connected to the Porcupine caribou herd, which relies on the Coastal Plain for calving and post-calving habitat. The Gwich'in consider the coastal plain as sacred, and the place where life begins. It is vital to their human rights and food security. I remind you that it is as important to preserve the sacred lands of the Gwich' people as it is to preserve Jerusalem and Mecca, none of which would be ever considered for destruction by you, I am sure.

Then there is the problem of climate catastrophe. I suspect that you are among the ones that denies climate catastrophe, but I want to remind you that the 2,000+ scientists at the IPCC (Intergovernmental Panel on Climate Change) are clear on this fact. Moreover, most common folk around, just looking around them, acknowledge that the climate is changing. The opening of these areas will further exacerbate climate change and catastrophe.

I could go on and on and on, but I stop here to save both my time and yours.

Sincerely,

Sergio Monteiro

1325 Wellesley Ave.

Los Angeles, CA 90025

I know my voice is a quiet one amidst the calamities of this world. I know that there are other more powerful, louder voices. Yet I still find it important to add my voice to the multitude of quiet voices that are speaking out in order to be heard.

In a year where many vestigial aspects of our society and culture have been questioned, it hurts my heart to see that a last vestige remains unquestioned to many: the desire for the extraction of fossil fuels from the farthest reaches of our earth. I know the economy of Alaska, and the residents of the state, receive economic benefits from the rich oil reserves that Alaska contains — such as in Prudhoe Bay. However, this is the most important time in human history to ask oneself what the benefits of economy over beauty are. I say beauty, though beauty may seem trite or unimportant, because I think that beauty should have standing. Beauty indicates wellbeing, does it not? Therefore things that are beautiful, just by being beautiful, are enough. There need be no further explanation, scientific or otherwise, for their protection.

And yet, not only is the ANWR a place of immense beauty, it is also a place that is meaningful to humans in so many other ways. Scientifically, it is diverse in landscape, plant guild, and animal species. It is also the resting place and homeland of one of Alaska's largest remaining caribou herds, one that subsistence hunters, the Gwich'in people, still rely upon for food. That is like you relying on the grocery store for food.

The ANWR is a place that a person would, when feeling despondent, point to and say: "Look: there is still hope!" It is a place where things are still "how they used to be", even before humans walked the earth. And I write this also because I am tired and despondent of how often I hear and think of how things used to be.

Since our economic activities have laid waste to millions of miles of our beautiful planet, I call into question further activity on yet untouched landscapes. In fact, any rational human being, after a glance at a recent satellite image of how much of the earth is now covered and cultivated by humans, would question further development. The time right now is for us to begin to repair the damage we have wrecked on our beautiful planet, not to create more.

I ask those who may read this, those who have a choice to make, those who have so much power, just one question: if this was your backyard, your people, or your home, would you do this? It's easier to do

something destructive to people and places far off. But one thing you must understand: the entire earth is one place. We have no other planet. Even if the ANWR seems to be one more place in a wide array of places available for use, we live on a dwindling planet, where land use increases every year while wild areas shrink. Every step taken towards further use is a step that ripples outward. It further empowers the agenda, belief, and culture that our limited planet, and its natural resources, is somehow limitless.

If I still have your attention, I offer gratitude, and ask for it just a little longer. Sometimes, when I am making a difficult decision, I step way back from my personal interests, likes and dislikes. I try to see my small problems from a higher perspective, in the long view of history, or maybe as a thread or a story where I am just a character. If you, reader, could make the choice of how you were seen, of what kind of character you are in your story, of how you want to be remembered—what choice would you make?

Who do you want to be?

Sincerely,

Hudson Gardner. Port Townsend, WA

To whom it may concern:

I wish to express my strong opposition to opening up the Arctic National Wildlife Refuge to leasing based on the following points:

---The native Alaskans, who depend on the caribou herd that migrates to the Refuge to birth their calves, would be adversely affected by lower birth and survival rates of an important food source.

---In addition to the caribou, the polar bears, migratory birds and other animals would be affected by the oilfield infrastructure. I have personally witnessed a confused caribou charging a feeder pipeline as he tried to move through the labyrinth of pipes at Prudhoe Bay.

---As an oilfield worker I was around the drilling mud ponds where birds thought they were landing on water and became stuck in the toxic material.

---Not enough depth and breadth to the Environmental Impact Statements in the planning stages, including an attention to the affect on recreational opportunities and businesses.

Having experienced firsthand the pristine wilderness of the east Romanzoff Mountains while climbing Mt Isto, I know what the land is like.

I hope that you will come to see the shortsightedness of this bid to open the Refuge and realize the long view by keeping it intact.

Thank you for your consideration. I trust that you will see the importance of maintaining the Refuge in its current state.

Sincerely,

Colleen Herning

POB 71082

Fairbanks, AK 99707

To whom it may concern,

I oppose oil and gas leasing on all tracts on the coastal plain in ANWR for the reasons specified below:

The Gwich'in peoples of Alaska and Canada are culturally and spiritually connected to the Porcupine caribou herd, which relies on the Coastal Plain for calving and post-calving habitat. The Gwich'in consider the coastal plain as sacred, and the place where life begins. It is vital to their human rights and food security.

Expanding oil and gas development in the Arctic will further exacerbate climate adaptation and mitigation challenges in an Arctic that is warming at twice the rate of the rest of the country. The EIS for oil and gas leasing on the coastal plain downplays unacceptable climate impacts of extraction in the Arctic.

An original purpose of the Arctic National Wildlife Refuge as established in ANILCA is to ensure "water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats. The BLM did no new analysis of how much water is actually available on the Coastal Plain in the coastal plain EIS and therefore does an insufficient job of analyzing impact to that water quantity.

The coastal plain is habitat for millions of birds which come from every continent, including off the coast of Antarctica, to breed, forage, and molt. BLM is disregarding impacts to birds by planning oil leases in the Arctic Refuge.

Regards,

MariDon Sorum

11 Rolling Hills Drive, Minot, ND 58703

Loren J Karro
Co-Leader
Alaska Soles Broadband
Great Old Broads for Wilderness
26239 E Buckshot Drive
Palmer, AK 99645

State Director
Bureau of Land Management
Alaska State Office
222 West 7th Avenue
Mailstop 13
Anchorage, AK 99513-7504

Dear Director:

Thank you for the opportunity to comment on the proposed oil and gas development lease sale in the Arctic National Wildlife Refuge.

I object to all the tracts offered for lease for a multitude of reasons, which will be detailed below. The lease of any of the tracts disregards the human rights and subsistence/cultural needs of the local Gwich'in Peoples; is based on a rushed and flawed EIS; degrades the habitat of and threatens the populations of polar bear, caribou and migrating birds in the area; is of questionable economic viability; increases the climate threat with no mitigation proposal; violates the surface area development limitations put forth in the Tax Cuts and Jobs Act of 2017; threatens the tundra and flora because of low snow levels; and degrades the wilderness and recreational value of the Refuge which is part of it's stated purpose.

1. HUMAN RIGHTS AND SUBSISTENCE RIGHTS OF THE INDIGENOUS POPULATION: The Gwich'in Peoples hold the coastal plain as sacred, a place where life begins. It is vital to the human rights of the Gwich'in; the rights to continue their cultural and subsistence lifestyle practices. ANILCA requires an 810 hearing for development that will substantially affect subsistence lifestyles, but none was held despite findings that the tract leases will impact the Porcupine Caribou Herd population. The Porcupine Caribou Herd utilize the majority of the Coastal Plain for calving and post calving activities, and the Herd is vital as both a food source and a source of cultural practices for the People. The Gwich'in filed a lawsuit in August, on the basis that the rushed and flawed EIS did not take into account the effects of the development on climate change and wildlife and habitat on the Coastal Plain

2. THE EIS WAS RUSHED AND FUNDAMENTALLY FLAWED: It was designed to be finished within a year's timeframe, despite the fact that most EIS plans require an average of 5 years to be completed. It had an abbreviated comment period of 45 days; 90 days is average and a group

of Senators asked that it be extended to 120 days. Alternative A, No Action, was declared to be out of consideration by the BLM because of the tenants of the Tax Act. All three of the action alternatives (B,C and D) offer more acreage than required by the Tax Act of 2017.

Additionally, the EIS failed to demonstrate that it was in adherence of one of the stated purposes of the Arctic National Wildlife Refuge under ANILCA; to ensure "water quality and necessary water quantity within the Refuge to conserve fish, wildlife and habitat." Water is scarce in the Coastal Plain, but no new analysis was made of how much water was available therefor there could be no analysis of the impact of the project on water quantity. The minimum of 540 wells would require 337 million to 1 billion gallons of water just to drill; ice roads would need 1 million gallons per mile, and each ice pad would require a half a million gallons. Additionally, production of 50,000 barrels of oil a day would require an additional 2 million gallons of water per day. With no new figures established of what quantity of water is now available in the coastal plain, there is no way to know if this water requirement would leave sufficient surface water to support the needs of the wildlife, birds, fish and people that have historically utilized the area.

The oil spill threat was also not sufficiently addressed. The EIS erroneously stated that there have only been 3 oil spills of over 100,000 gallons in the Arctic. In truth, there have been 5 spills of that size or better between 2002 and 2016; and a total of 16 major spills of over 10,000 gallons of oil.

Because of these serious EIS flaws, all of the tracts should be excluded from the proposed lease sale.

3. THREATS TO WILDLIFE POPULATIONS AND HABITAT: The proposed lease sales of any and all of the tracts threaten the wildlife and wildlife habitat in the coastal plain, specifically of polar bears, caribou and migratory birds, and thus all of the tracts should be excluded from the sale.

Large areas of critical habitat for the Southern Bering Sea Polar Bears will be affected by the leasing of any and all of the tracts. There are only 900 polar bears of this subpopulation left, a decrease of about 50% in the last 30 years. The bears use the coastal plain for denning and for summer refuge. About 77% of the proposed project area is denning habitat. The EIS acknowledges that "the potential for injury or mortality could be high when developing new oil and gas projects in polar bear habitat", but provided no estimate of the numbers of bears that would be killed, injured or displaced by the proposed leases and seismic testing activity. Additionally, the bears seek refuge on the Coastal Plain, and more and more of them will need the Coastal Plain for survival in the summer months as the ice packs further diminish due to warming waters and air. In fact, the carbon emissions by the oil and gas developments will hasten the warming trend and increase the sea ice loss faster than before.

All of the tracts should be excluded from the sale because the Refuge plain is critical calving and post calving habitat for the Porcupine Caribou Herd. The plain provides nutrient rich forage as well as protection from predators during this sensitive time. Additionally, the caribou use

virtually all of the plain for all of its survival needs during the annual migrations. BLM acknowledges that oil and gas development would likely 'disturb and displace' caribou, especially the cows and their calves. It has been shown that anything that moves caribou herds from the Coastal Plain is detrimental to calf survival; the tundra to the East has poorer forage and more predator populations. Decreased calf survival means decreased or non-existent population growth. Despite this the only mitigation called for in the EIS, at best, is halting "major construction activities", not drilling, for one month during calving, making no adjustment for the vulnerable post calving period.

Millions of migrating birds, from every state as well as much of the world, use the Refuge to breed, feed and molt. 180 bird species have been recorded in the refuge, and over 70 species are known to nest on the Refuge coastal plain. Disturbance of activities related to oil field development, such as helicopter traffic, stresses birds, especially those nesting nearby and those congregation during the molt and migration. Additionally, oil fields attract predators such as fox and ravens, which feed on migrating birds. It has been shown that in Prudhoe Bay, "increased predation on nesting waterfowl is a significant impact". [Audubon Society, Alaska State Chapter]. Potential oil spills can be a big threat to bird population, especially waterfowl, shorebirds and loons, which are at risk on long term population damage if an oil spill were to contaminate coastal lagoon and wetland.

A special report by the Alaska State Office of the National Audubon Society concluded in part that "The construction and operation of a sprawling industrial oilfield would reduce populations through the inevitable loss, degradation and fragmentation of habitat in the narrow coastal plain." Degradation and fragmentation of habitat will be more harmful to birds on the Refuge coastal plain than in the Prudhoe fields, where there is measurable decrease in shorebird numbers around the oil fields, because the Refuge coastal plain is narrow and there is limited coastal habitat to accommodate displaced birds. All of the proposed tracts should be excluded from leasing to protect the nesting, molting and migratory bird populations.

4. DOUBTS AS TO ECONOMIC VIABILITY: There is serious question as to if leasing of any of the tracts in the Refuge is economically viable. Every major national bank, most recently Bank of America, have publicly stated that they will no longer provide funds for oil and gas development. Besides pressure from environmental groups, the banks "can no longer tolerate the risk of drilling in one of the fastest-warming places on the globe". [Bloomberg Dec. 1, 2020 "These Days, the Smart Money is Staying Away from Arctic Drilling"] Wells Fargo has reported that 47% of their past-due corporate loans in 2nd quarter 2020 were from the oil, gas and pipeline industries, which comprise just 3% of it's commercial loan portfolio. Rystad Energy predicts that a break-even price for oil that can be extracted from the Refuge could be as high as \$80/barrel, a price that hasn't been equaled since October of 2018.

The value of the tract leases is also questionable. The only data on oil resources is from a single well, drilled in the 1980s, which had such disappointing results that drilling company pulled out without other exploration and with no public report. It will be about 10 years before oil will

actually be extracted and sold from the leases, by which time the demand for fossil fuels will be greatly decreased in the face of improved energy economy and production from renewable energy sources. No estimate of the expected revenues has been provided, although a major factor in the Refuge development being attached as a rider to the Tax Cut and Jobs Act of 2017 was a projected \$2 billion in government revenue (half to the State of Alaska, half to the Federal Government). All of the tracts should be excluded from the lease sale until and unless they can be shown to be economically feasible and provide the level of revenues that were the basis for opening the Refuge to oil and gas leases.

5. CLIMATE CHANGE THREATS: As stated above, investment in oil and gas development in the arctic is an intolerable risk partly because of working in one of the fastest warming place on the globe. This can be a circular problem, as increased oil and gas development will increase carbon emissions and further hasten global warming. The EIS grossly underestimated the carbon emissions that would result from the tract leases and the oil and gas developments thereon. The lease sales of any and all of the tracts will exacerbate the challenge of adapting to and mitigating climate change in the Arctic. No mitigation plan for the increased carbon emissions from the lease and subsequent development of the tracts was offered.

6. SURFACE AREA DEVELOPMENT IRREGULARITIES: The leasing of any and all of the tracts could result in development of far great surface area than the 2,000 acre limit stipulated in the Tax Cuts and Jobs Act of 2017. Under the EIS, ice roads and pads, elevated pipelines and gravel mines do not count as surface disturbances. Further, land used but no longer needed for oil and gas development will be considered "reclaimed", the acreage deducted from the surface area development footprint and the corresponding acreage credits towards more development, a "rolling cap" interpretation of the surface area development limit. This unacceptable interpretation of the 2,000 acre limit is reason to exclude all of the tracts from the lease sale.

7. DAMAGE TO UNDERLYING TUNDRA AND FLORA DUE TO LOW SNOW COVER: Research from the University of Alaska [Arctic Today, September 5, 2019] found that drilling rigs and other industrial equipment used in the Refuge coastal plain will most likely harm the underlying tundra, due to inadequate snow cover to support heavy vehicles. Heavy equipment travel on the North Slope is allowed only when the top layers of the ground are hard-frozen and when there is sufficient snow cover to protect the tundra from compaction damage. These mitigating conditions are rare on the Refuge Coastal Plain, due to high winds moving snow and to the sloped nature of the terrain and deeply cut creek beds. During the 2018/2019 winter, adequate snow cover was never reached on a good part of the 1002 area, and none of the foothills region was opened to tundra travel. Should heavy equipment transportation and use in seismic exploration be allowed despite inadequate snow cover, permanent damage to the underlying tundra will result. If it is not allowed, it will further the cost of the projects and cast even more doubt on the economic feasibility of the lease sales. All of the tracts should be excluded from lease sales until the problem of protective snow cover can be properly addressed, if possible.

8. WILDERNESS AND RECREATIONAL VALUE DEGRADATION: All of the tracts should be excluded from leasing as oil and gas development there would degrade the wilderness and

recreational value of the Refuge, which are two of the primary purposes of the Arctic National Wildlife Refuge as established in ANILCA. From high points in the wilderness, over 99% of the coastal plain is visible, so any oil and gas extraction development on any of the leases would be visible eyesores. Additionally, a GIS analysis by Dr. Stuart Smith found that development on virtually all of the leases would be visible to people rafting six of the major rivers in the refuge. Many of the lease parcels (1-3, 5-8, and 13-17) actually adjoin the designated wilderness area.

The above listed reasons provide more than enough basis to exclude all of the tracts from the lease sale. I have no doubt that a properly thorough EIS, with complete scientific vetting and commenting process, would have found many more problems with the proposed lease sales and resulting oil and gas exploration and development. We have so few intact ecosystems left, and complete arctic ecosystems such as the Arctic National Wildlife Refuge should be held up and protected in their entirety as national (indeed global) treasures.

Sincerely,

Loren Karro



State Director
Bureau of Land Management
Alaska State Office
222 West 7th Avenue Mailstop 13
Anchorage, Alaska 99513

December 14, 2020

Alaska State Director Chad Padgett,

I am writing to you to express my opposition to the leasing of all tracts for oil and gas exploration and development located within the Arctic National Wildlife Refuge. I am a lifelong Alaskan, professional visual artist, small business owner, wilderness guide, and outdoor recreationalist. I am incredibly privileged to be able to visit wilderness areas throughout Alaska for my work as a field artist and guide, including the Arctic Coastal Plain. I have experienced this landscape firsthand, and want to tell you why leasing all tracts of the Arctic National Wildlife Refuge is rushed, unjust, inequitable, and irresponsible.

1. Human Rights and Indigenous Knowledge

The Gwich'in and Iñupiaq people of Alaska and Canada are culturally and spiritually connected to the Arctic Coastal Plain. The Gwich'in consider it to be a sacred place, inextricable from their cultural identity and food security. Despite directly acknowledging that oil and gas development will have impacts on the caribou of the Porcupine herd, BLM also manages to conclude that there will not be an impact on subsistence resources for the Gwich'in. This is an egregious disconnect. A significant amount of Gwich'in subsistence comes from the Porcupine Caribou Herd, and BLM is ignoring basic human rights in favor of corporations.

2. Arctic Ecosystem Health

The Coastal Plain is a vast ecosystem that is unlike any other in the United States. Anyone who has experienced the Coastal Plain knows its "flatness" is not for lack of complexity. It is a many layered ecosystem, remarkable in its horizontal dimensions, and equally fascinating while laying in the tundra looking at minute details, or flying over it and seeing its forms and features on a massive scale. Migratory birds, caribou, bears, and unique species of plants have adapted to be able to live in this environment. Caribou and polar bears stand to loose denning and calving grounds, and as we know, when we mess with one link in a complex web, we cause ripple effects throughout the ecosystem as a whole. This ecosystem is already facing the pressures of a warming climate, and oil and gas development will only exacerbate the issue.

3. Climate Change

Climate change is happening at an even faster pace in the Arctic. We very clearly see this through scientific studies of animals, plants, permafrost and weather. The fact that conditions are rapidly changing makes me seriously question the feasibility, reliability, and economics of operating oil and gas extraction in this remote area. Oil and gas exploration and development literally scars the landscape, as evidenced to the east of the Refuge where there are seismic lines, roads, gravel pits, increased traffic, and infrastructure, as well as a history of spills. The extracted oil and gas will be sold on a market that is quickly and inevitably shifting, while directly adding to the problem through an increase in carbon emissions. Development is incredibly shortsighted and irresponsible when considering that our survival as a species literally depends on phasing out the extraction of fossil fuels.

On a personal note, I hope to continue to enjoy the Arctic Refuge as an artist, guide, hunter, recreational hiker, rafter, and fisherman. These activities are all hugely important to me, and directly tied to my income, identity, and love for Alaskan landscapes. We are all responsible for managing the Arctic Refuge for future generations and diverse activities including subsistence, tourism, hunting, fishing, and recreational sports. I urge you to consider the fact that the oil and gas industry puts the future of all other users of the Arctic Refuge at risk. It is critical that the state of Alaska honors the founding principles of ANILCA and leaves the Arctic Refuge in its current state.

Sincerely,
Klara Maisch

NORTHERN CENTER

Emily Sullivan <emily@northern.org>

Comment on Notice: Coastal Plain Alaska Oil and Gas Lease Sale

1 message

Kathy O <kod4960@gmail.com>

Wed, Dec 16, 2020 at 6:10 PM

To: blm_akso_ak932_cpcomments@blm.gov

Cc: Alaska SOLES <alaskasoles@gmail.com>, emily@northern.org

My comments are submitted in the text of this email and I have attached a PDF copy as well

December 16, 2020

State Director

Bureau of Land Management Alaska State Office

222 West 7th Avenue, Mailstop 13 Anchorage, AK. 99513-7503

Comments on Notice: Coastal Plain Alaska Oil and Gas Lease Sale [19X.LLAK930000.L13100000.EI0000.241A]

I am writing in opposition to the opening of Lease Sales on the Coastal Plain of the Arctic National Wildlife Refuge. The following are a few of my reasons for opposing the leasing action of any of the Tracts numbered 2021-CP-001 through 2021-CP-032.

1. I object to comment process for this notice. The federal register notice does not provide for electronic nor online comment. In the age of electronic communication and delays with U.S. Post Office, it appears that the Bureau of Land Management (BLM) is deliberately limiting public comment and making it difficult to provide comments, by keeping the window for comments very short and by accepting ONLY hard copy comments. It appears this action is being rushed for political reasons and is short circuiting the public review process. This process is too important to treat it with such recklessness. The secret opening of bids also limits the public involvement in this process.

2. The Coastal Plain is critical denning habitat for the Southern Beaufort Sea (SBS) polar bear populations. The best technology for detecting polar bear dens is only about 50 percent accurate, meaning there's a high probability of seismic survey disturbing undetected dens. Seismic testing will cause vibrations throughout the area, which may adversely affect the success of denning and rearing of young. With melting sea ice and accelerated climate change, the bears will become more dependent upon coastal habitat to meet the needs of their life cycle. A recent study released by the USGS, Atwood, T.C., Bromaghin, J.F., Patil, V.P., Durner, G.M., Douglas, D.C., and Simac, K.S., 2020, Analyses on subpopulation abundance and annual number of maternal dens for the U.S. Fish and Wildlife Service on polar bears (*Ursus maritimus*) in the southern Beaufort Sea, Alaska: U.S. Geological Survey Open-File Report 2020-1087, 16 p., <https://doi.org/10.3133/ofr20201087>, concludes "As sea ice becomes a less stable substrate in winter, the frequency of land-based denning by SBS polar bears likely will continue to increase."

3. Economic Factors. Over the past year Goldman Sachs, JPMorgan, Chase, Wells Fargo, Citi, Morgan Stanley and Bank of America have all committed against funding drilling in the Arctic National Wildlife Refuge, joining more than two dozen global banks that have also prohibited financing Arctic drilling projects. If the major financial institutions are not willing to finance oil development in the Arctic National Wildlife Refuge, why is the BLM even proceeding with actions that involve lease sales, winter seismic exploration and developing oil resources in the Refuge? If a project is not able to obtain financing, it should NOT be considered a viable action alternative. Public funds should not be used to execute this lease sale process.

4. The Gwich'in refer to the Coastal Plain as "Iizhik Gwats'an Gwandali Goodlit" or the "sacred place where life begins. The Gwich'in culture, history, spiritual and subsistence needs are linked to the Porcupine caribou herd. The Porcupine caribou herd utilizes the Coastal Plain as their calving grounds. The Porcupine caribou are vital to their culture and their traditional way of life, on their traditional lands. Gwich'in have been actively fighting the oil development

proposals for years, but their concerns have been disregarded, marginalized and dismissed. The United States has historically disregarded native cultures and their claims to lands and resources that pre-date European settlement of the nation. Must we continue to do so in this situation?

5. The narrow strip of tundra in the Coastal Plain is of national and international significance to millions of migrating and nesting birds. The two maps below, from the Arctic National Wildlife Refuge website, illustrate how birds migrate thousands of miles, from around the nation and the globe to the Coastal Plain each year, to complete their breeding cycle. If this habitat is altered or diminished by oil extraction activities, or if these birds are disturbed during their short nesting period, the birds lifecycles and populations have a high potential to be negatively impacted.

If their breeding cycle is compromised it not only effects the populations on their nesting grounds it has longer range consequences as these birds fill a niche in other ecosystems throughout our world, during the majority of their year, and are important to other nations. For example, during a trip to New Zealand, they spoke of the Bar-tailed godwit as "their" bird, which only visits the Arctic to nest. Leasing and oil development on the Coastal Plain would have national and global consequences.

National Migration of Birds to Coastal Plain for Breeding Habitat

International Migration of Birds to Coastal Plain for Breeding Habitat

Sincerely,

Kathleen M. O'Reilly-Doyle
Alaska Soles - Great Old Broads for Wilderness 15927 Bridgeview Drive
Anchorage, AK. 99516

9 attachments

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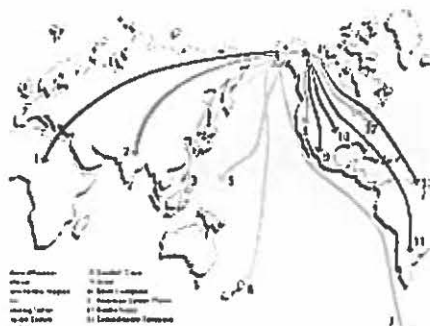
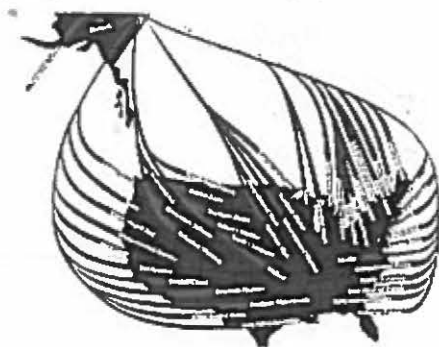
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Alaska Soles



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NORTHERN CENTER

Emily Sullivan <emily@northern.org>

Arctic Refuge Public Comment

1 message

Adena Rice <adena.rice@gmail.com>

Wed, Dec 16, 2020 at 7:35 PM

To: emily@northern.org

To Whom It May Concern:

Please accept and fully consider these comments on the nominated tracts for the 1/6/2021 Coastal Plain Alaska Oil and Gas Lease Sale. I appreciate the opportunity to comment on the oil and gas tracts proposed for leasing.

I am concerned about how this leasing will impact the human rights and food security of the Gwich'in peoples, as well as the habitat of polar bears and caribou. I think it is very important to respect the land rights of indigenous people and to protect the ecosystem's biodiversity.

Tracts 1 - 31 should be excluded from oil leasing, as the coastal plain provides critical habitat for denning polar bears. As the effects of climate change causes sea ice to recede, land denning sites in the Arctic Refuge become increasingly important. According to Map 3-37, leasing these tracts would have unacceptable impacts on denning polar bears and polar bear critical habitat.

Polar bear critical denning habitat constitutes 77% of the program area (Vol 1, p 3-133) and maternal dens are disproportionately high in high hydrocarbon potential zones (Vol 1, p 3-124). While the DEIS acknowledges the potential for injury or mortality for polar bears, there is not an adequate estimate of the number of bears that could be killed, injured, or displaced by the leasing process or seismic testing.

Additionally, tracts 1 - 31 should be excluded from oil leasing, as they hold critical calving and post-calving habitat for the Porcupine caribou herd. Map 3-21 shows PCH calving and post-calving covering most of the Coastal Plain (Vol. 2, 3-21). Disturbances that cause the herd to move away from the Coastal Plain have been shown to be detrimental to calf survival (Vol 1, p. 3-114) and would likely halt population growth (Vol 1, p. 3-115). BLM acknowledges that oil & gas activities will likely disturb and displace caribou but fails to adequately address these impacts. The DEIS offers insufficient mitigation of the impacts to PCH.

Despite acknowledging that oil and gas can have impacts on caribou, BLM concludes that there will not be an impact on the subsistence resources for the Gwich'in and that the subsistence needs of the Gwich'in do not qualify for an 810 hearing under ANILCA (Alaska National Interest Lands Conservation Act) which is required for development that will substantially affect subsistence. Despite the fact that a significant percent of Gwich'in subsistence comes from the Porcupine Caribou Herd, which the BLM's own analysis finds leasing will affect, they then find that Gwich'in subsistence use will not be affected. This ignores the traditional knowledge and human rights of the Gwich'in.

The proposed leasing of tracts 1 - 31 may have significant negative impacts on polar bears, the Porcupine caribou herd, and the Gwich'in peoples. The DEIS neither adequately estimates or offers sufficient mitigation for these impacts. Please consider removing these tracts from the lease sale.

Thank you,
Adena Rice

847.899.1494

3830 W 73rd Ave
Westminster, CO 80030

adena.rice@gmail.com

Mandie Torres
(951)526-4318
mandieisdandy@gmail.com
6008 Stafford Ave Apt G
Huntington, Park CA
90255

I am submitting this comment with a strong opposition to leasing all tracts on the coastal plain for several reasons.

The Gwinch'in peoples in Alaska and Canada depend on the Porcupine caribou herd from the sacred coastal plain not only for food but are also spiritually connected to them and these lands. Leasing tracts here would be an absolute disrespect and violation to their rights to life and peace. Please respect the Indigenous peoples of these lands. Furthermore, leasing to drill will have a tremendous horrific impact on the animals of these lands as well. This is a habitat to several different animals such as birds, polar bears, the caribou themselves, and many more. It's been proven time and again that violence to the land by drilling affects all life in the area. It poisons, it pollutes, and affects the climate. The Bureau of Land Management didn't even perform a new analysis to see how much water is actually available so the BLM did not do its job properly to check water quantity. The arctic is already warming at twice the rate of the rest of the country, leasing would intensify these rates.

In short, the leasing would be a violation of human rights, animals rights, and the rights of nature. When will enough be enough? When will the lives of Indigenous peoples and all living things on this planet matter more than oil greed?

NORTHERN CENTER

Emily Sullivan <emily@northern.org>

Arctic Refuge Public Comment

1 message

Duncan Wright <duncan.wright.ak@gmail.com>

Wed, Dec 16, 2020 at 9:11 PM

To: Emily@northern.org

Hello,

Leasing oil and gas tracts in the Arctic National Wildlife refuge would be incredibly foolish and short-sighted. To do so would be a catastrophe of human and animal rights of the highest order. In fact, the list of reasons why not to drill in the refuge is near endless, but I will attempt to list some of them here

To drill in ANWR would be to completely disregard the rights and cultural values of the Gwich'in peoples, who have traditionally relied on the Porcupine caribou herd both on a spiritual level and for food. This great herd would be without calving grounds if the refuge, which is a sacred place to them, was disrupted. Furthermore, thousands of Gwich'in people would then be subject to potential food insecurity.

To a similar point, the refuge also provides habitat to millions of migratory birds, fish, polar bears and other animals, in addition to being a critical source of water. Drilling in the ANWR will draw huge amounts from the extremely limited water on the coastal plains. Similar levels of inattention have been paid to the long term effects of drilling on the climate at large. The arctic is indisputably warming twice as fast as the rest of the country, and continuing to drive emissions will only exacerbate the issue. The draft EIS dramatically underestimates how much carbon would be emitted as a result of drilling. Ultimately, the costs of drilling in the Arctic are without measure, and the promise of profit can never make up for that.

State Director
Bureau of Land Management
Alaska State Office
222 West 7th Avenue, Mailstop 13
Anchorage, AK 99513

December 16, 2020

Alaska State Director Chad Padgett,

I am writing to address my concerns with opening the Arctic National Wildlife Refuge for oil exploration.

I have worked in the oil industry on the North Slope since 1992 and seen development executed both responsibly and poorly. Oil exploration is currently expanding in the National Petroleum Reserve Alaska, which ironically means it is no longer a reserve. That now makes ANWR both a petroleum reserve and a wildlife preserve, as we are not saving those other resources for the future.

Currently our existing oil facilities on the North Slope are being developed far beyond the lifespan they were originally designed for, creating an ever-expanding area of development that is never being restored in any substantial way. Before we develop our last protected areas of the North Slope, we need to prove that our existing facilities can be demobilized in a way that allows the natural flora and fauna to begin what is bound to be a slow recovery. The oil is not going anywhere and leaving it there until it may be of greater value or not needed at all would be a win either way. Right now, humanity needs to focus on ways to slow our consumption of fossil fuels, not make every last dollar we can before a better alternative arrives.

Climate change is also making development on the North Slope more challenging. With harder to predict seasons for ice road construction, changing water level fluctuations and ground subsidence causing damage to existing facilities, the game is changing. It might be a good time to wait before pushing into a disputed area, as our current methods of working in such a fragile environment might be nearing the end of their useful life.

Climate change is going to add new and most likely unforeseen pressures on the wildlife of the North Slope as well. Caribou herds may be forced to adapt to the changing environment by adjusting their migratory routes and calving grounds. This applies as well for the waterfowl that nest there in summer. As the optimum nesting sites change, the migratory birds must be able to adapt. Making development decisions today based on current patterns will limit the ability of the caribou and birds to adapt to these changes. This makes it even more important to keep an undeveloped reserve open to wildlife, not to drilling.

Around the world, communities are discovering that the existing patch work of parks and wetlands are often not enough to sustain the wildlife they are meant to protect. Because of changing climate and development pressures, wildlife corridors and connected wilderness areas have proven critical to the continued survival of some species. We can learn from these shortcomings and show the foresight to do something proactive instead of repairing these areas after they are lost. Alaska has always had the opportunity to balance conservatism with our endless pursuit of more money, and in the end that is what this is really about -- putting the almighty dollar ahead of any other need of our communities, our habitats, and the wildlife they support.

Once again, we have the chance to prove we can do the right thing and keep the Arctic National Wildlife Refuge protected for our future and generations to come.

Sincerely,

Jonathan Ditto

Dear State Director for the Bureau of Land Management State Office,

I am writing to you to express my strong opposition to the upcoming oil and gas leases in the Arctic National Wildlife Refuge. This is public land, and I believe it should not be used for the extraction of oil and gas for four key reasons.

First, the coastal plain is critical habitat for wildlife, especially the Porcupine Caribou herd.

Second, it violates the human rights of indigenous groups who see this land as sacred ground and have depended on its resources for centuries.

Third, the environmental impact statement was very inadequate for the scale of development and land impact that oil and gas extraction causes.

And lastly, our world is confronted with the very severe reality of global climate change driven by anthropogenic causes, particularly emissions of CO2. With the huge scale of impacts that the current levels of CO2 will cause, it is irresponsible to allow the extraction of more oil and gas to contribute to these emissions.

Thank you for considering my letter and perspective in your decision.

Sincerely,
Claire Giordano

19732 SE 30th Street
Sammamish WA, 98075

NORTHERN CENTER

Emily Sullivan <emily@northern.org>

Arctic Refuge Public Comment

1 message

Hannah Pratt <hannahpratt.mp4@gmail.com>
To: emily@northern.org

Wed, Dec 16, 2020 at 8:41 PM

Hello and happy holidays!

My name is Hannah, and I grew up in Anchorage, Alaska. I am 25, and the Pebble Mine fight lasted most of my life. When I went away for college, I could hardly believe that none of my classmates knew about the proposed mine. Alaska is often forgotten by the rest of the States due to its small number of people and because of its dislocation from the continental states. I told stories of how the recent winters had almost no snowfall (in Anchorage), how people in villages around AK were concerned about lack of ice, and explained the detriment of the melting hoar frost. All of these issues are so real to me, but may seem remote to people not from Alaska. I made it my work at school to discuss environmental issues from home, in order to teach people what was happening.

The North is the fastest warming place on Earth. The northernmost town in the world, Longyearbyen (Norway), temperatures have risen 4°C since 1971, according to an article that The Guardian posted in July of 2019, and this number is expected to increase drastically in rapid measure. We know that a global temperature increase of 2°C would be detrimental to life on Earth as we know it. We need the Arctic to keep those temperatures down, and if the Arctic is one of the fastest warming places on the planet, we need to find a way to protect it no matter the cost. This is not a localized issue. Drilling in Alaska does not only affect the lives of bears, birds, fish, caribou, tundra, ice, and the native lifestyle that exists alongside said wildlife, but it produces carbon emissions that will affect the entire world.

When temperatures rise globally, the balance of life begins to tilt. This is already happening at an alarming rate. We are in the middle of the 6th mass extinction and the two factors that stand out about this extinction are thus: animals are going extinct at a rate like never before, and that it is anthropogenic. Drilling in the Arctic Wildlife Refuge would not only bring fossil fuels out of the ground, but it would severely harm habitats that are desperately needed by the millions of birds that come from all over the world, including Antarctica, to nest and breed.

Teaching my college friends about Pebble, about the warming climate in Alaska and other northern parts of the world has really opened my eyes to how much is kept from people. Corporations do not want the people to know what is happening, what could happen, until it is too late. They try to keep public input out of it because they know that if the public found out the truth about what was being proposed, they would be outraged. If the world knew about how the drilling in the arctic was contributing to the global temperature rise and increasing wildfires, hurricanes, melting ice, and other dramatic weather events all over the globe, they would have something to say. But they don't know, and it is not easy to sit and write a letter like this and follow through to get it mailed, so that's why I'm writing. I hope my letter speaks for the people of the world who want a future that isn't just a repeat of 2020 over and over and over. We want to see change for the better. Stopping Pebble was just one battle (and the fight is still going), and preventing drilling in the arctic is another. Oil is a finite resource. Is the money worth the disasters it would cause down the line?

Thank you for your time,
~Hannah