

139 Jennifer Lane
Fall River, WI 53932

16 December 2020

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

Dear Mr. Padgett,

As a lifelong Alaskan and a wildlife scientist, I urge you to oppose seismic exploration and oil and gas lease sales in the Coastal Plain of the Arctic National Wildlife Refuge. Raised in Alaska and currently pursuing a Master's degree in wildlife conservation, I understand the economic importance that oil development has had in Alaska, but I understand, too, the unparalleled and irreplaceable wildlife ecosystems found in our state.

Advanced wildlife science and age-old Indigenous knowledge have shown irrefutably that the Coastal Plain is critical habitat for calving caribou of the Porcupine herd. Studies have also shown that the impacts of climate change and anthropogenic disturbance are already negatively affecting caribou migration and survival. As wild caribou populations dwindle in Canada, Alaska must take heed and proactively manage our herds to ensure they continue to thrive for future Alaskans. The hunting and subsistence lifestyle that we cherish in Alaska cannot be sustained alongside continued oil and gas development in areas of critical wildlife habitat.

It is also our duty to protect the rights and food security of our Indigenous neighbors and friends. The Gwich'in rely on the Porcupine caribou herd for food and tools, and the Coastal Plain is sacred to them. Allowing oil and gas development of the Coastal Plain for the sake of short-term energy development is shortsighted and ignores the long-term effects of climate change and loss of wildlife habitat. Alaska has the opportunity to be a leader in developing renewable energy and choosing the rights and prosperity of its citizens over development. I urge you to listen to the science: the Coastal Plain is a keystone habitat for caribou and other wildlife and is not the place for further oil and gas development.

Sincerely,

A handwritten signature in cursive script that reads "Anna Brose".

Anna Brose

December 1, 2020

Arctic National Wildlife Refuge Coastal Plain Public Comment

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

Dear Alaska State Director,

I write to you to ***oppose leasing of all tracts on the Coastal Plain (CP) of the Arctic National Wildlife Refuge (Refuge)***. The Bureau of Land Management's (BLM) pursuit of drilling in this Refuge violates Indigenous and human rights; neglects wildlife, environmental, and climate impacts; and ignores the Federal provisions in the Alaska National Interest Lands Conservation Act (ANILCA) for this place.

Before this area came to be known as the Refuge, the Gwich'in peoples of Alaska and Canada stewarded and lived with these lands and all creatures on them for thousands of years. The Gwich'in continue to thrive here and connect themselves culturally and spiritually to this place and its resources, particularly the Porcupine caribou herd: "one of the largest migratory barren ground caribou herds in North America"¹ whose calving grounds lie within the bounds of the Refuge. Because of the abundance of life in the Refuge, the Gwich'in refer to the Refuge as *Iizhik Gwats'an Gwandaii Goodlit*, or "The Sacred Place Where Life Begins."² ***Leasing any tracts of the CP would violate the Gwich'in peoples' rights as humans and Arctic Indigenous Peoples and harm the longevity of this critical caribou herd.***

In planning to lease tracts of the CP, BLM failed to secure an Environmental Impact Statement (EIS) that adequately discussed the environmental impacts of drilling within the Refuge. ***The EIS process for the CP was rushed and did not allow for sufficient public and professional review of potential impacts of oil and gas exploration***, including irreversible scarring of landscapes and alteration of ecosystems;³ decreased water quality and quantity;⁴ potential oil spills and water and land contamination;⁵ exacerbated effects of climate change;⁶ and alteration

¹ Porcupine Caribou Management Board, <https://www.pcmnb.ca/herd>.

² Gwich'in Steering Committee, <https://ourarcticrefuge.org/take-action/>.

³ Henry Fountain, *New York Times*, <https://www.nytimes.com/2018/08/03/climate/alaska-anwr-seismic-testing-tracks.html>.

⁴ Nenibarini Zabbey and Gustaf Olsson, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6607187/>; Kate Kelly, Matt Lee-Ashely, Jenny Rowland-Shea, and Sally Hardin, *Center for American Progress*, <https://www.americanprogress.org/issues/green/news/2019/01/10/464819/interior-department-cutting-corners-ignoring-science-arctic-national-wildlife-refuge/>.

⁵ Zabbey and Olsson; Kelly et al.

⁶ Kelly et al.

of habitat for many endangered and protected wildlife, including polar bears, caribou, and migratory birds;⁷ among many other likely environmental impacts.

Furthermore, opening the CP to oil and gas leasing violates the protections to subsistence ways of life and water quality provided by ANILCA. Under Title XIII of ANILCA, food security through practicing subsistence ways of life must be Federally protected. However, BLM, ignoring the large percentage of subsistence food the Gwich'in secure from the Porcupine caribou herd, fails to recognize their rights to subsistence foods protected by ANILCA by moving forward with leasing the CP. Additionally, the Refuge was originally established under ANILCA to ensure "water quality and necessary water quantity within the Refuge"⁸ for wildlife species in its ecosystem. Though the CP is not protected from oil and gas exploration, water and ecosystem quality would irrevocably be impacted by any such activity in the CP. This Federal protection is thus blatantly ignored by the proposed leasing process. ***Neglecting to uphold the Federal law of ANILCA is a gross overstep of BLM as a Federal agency and should be grounds to terminate the CP leasing project.***

In sum, leasing any and all tracts of the Arctic CP would permanently damage Arctic Indigenous food security, critical Arctic wildlife habitat and ecosystems, and legitimacy of ANILCA and the Federal process. I urge BLM to immediately close all proposed tracts for sale for oil and gas drilling in the CP of the Refuge for the sake of our common humanity and home.

Sincerely,

Terese Schomogyi
tschomog@alumni.nd.edu
+1 (253) 948-2511
P.O. Box 1765, Bethel, AK, 99559-1765

⁷ Kelly et al.

⁸ U.S. Fish and Wildlife Service, <https://www.fws.gov/refuge/arctic/faqs.html>.

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

December 13, 2020

To Whom it May Concern,

Here we go again. The Arctic National Refuge must be protected from oil and gas development period. The reasons are manifold. We are in the midst of an energy crisis that has to turn away from damaging fossil fuel extraction. We are in a downward spiral of wildlife extinctions that will kill us if we don't stop and it's 2020 and we absolutely need to consider the rights of the indigenous Gwich'in Nation.

Please consider support instead for alternative energy as the fossil fuel industry has poisoned vast areas with their development and their products. If I were to catalogue all the oil spills on land and sea it would still amount to a fraction of the pollution caused from general use of fossil fuels and the damage that development brings. We simply must dedicate our lives to alternate ways of living on planet earth for future generations or they will not be healthy future generations.

We are in the midst of the sixth extinction. More than 500 species of land animals are found to be on the brink of extinction within 20 years. The Porcupine Caribou herd must be protected by ensuring healthy birthing grounds. Polar bears are at a tipping point and need more viable habitat not less.

Lastly, the Gwich'in have suffered as a Nation and it is past time that United States agencies uphold the dignity of the Gwich'in tribe by listening to their concerns and protecting their rights as an original people who lived in balance with their place. It is not the place of any fossil fuel or agency representative to direct the future of these coastal plains.

Most Sincerely,



Ali Freedlund
PO Box 1
Petrolia, CA 95558
ali@matttole.org

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

To whom it may concern,

I am writing to oppose the irresponsible leasing of all tracts for the Coastal Plain of Alaska Oil and Gas Lease sale. This lease sale is overlooking many important factors including the biological value of the coastal plain and detrimental long-term effects of extraction on an already fragile environment. Specific concerns are as follow:

- All tracts should be excluded from oil leasing, as the coastal plain provides critical habitat for denning polar bears. As sea ice recedes due to warming temperatures, land denning sites in the Arctic Refuge become increasingly important. According to Map 3-37, leasing this tract would have unacceptable impacts on denning polar bears and polar bear critical habitat.
- Tracts #1, 2, 3, 4, 5, 7, 9, 8, 10, 12, 13, 14, 18, 20, 21, 22, 23, and 24 should be excluded from oil leasing, as it holds critical calving and post-calving habitat for the Porcupine caribou herd, according to Maps 3-35 and 3-29.
- Tracts #27, 7, 31, 29, and 32 should be excluded from oil leasing to preserve critical fish habitat. According to FEIS Map 3-19, this tract includes essential habitat for Arctic Cod.
- All tracts should be excluded from oil leasing, as 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.
- Tracts #4, 5, 7, 11, 12, 18, 19, 20, 21, and 28 should not be considered for oil leasing, as it provides important habitat for Snow Geese, seeing more than 21 flocks of Snow Geese over 500 in number between 1982-2004 according to FEIS Map 3-26.
- 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.
- All tracts should be excluded from oil leasing, as all tracts are visible from high points within the federally designated Wilderness portion of the refuge. The negative visual impacts on Wilderness recreation in the Arctic Refuge negate the original wilderness and recreation purposes of the Arctic Refuge as established in ANILCA.

This oil and gas lease sale should be delayed in order to adequately consider the affects of the proposed development rather than rushing through the process for political points.

Sincerely,

Scott Patterson
4741 Grumman St
Anchorage, AK 99507
highfluoro@gmail.com
802 881 7119

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

Dear Director,

This letter with its comments are in response to the Nov. 17, 2020 "call for nominations" for leasing of drilling rights within the protected Arctic National Wildlife Refuge. The leasing within the refuge portends numerous problems and profound negative effects on our national heritage. Much more analysis is needed before deciding to move forward - the process is being rushed. The beautiful Arctic Refuge is a national treasure, and a treasure and place of livelihood for the Gwich'in indigenous people as well. The Refuge is one of the few remaining untouched wilderness areas in all of North America.

I expect that the drilling for oil inside this beautiful wilderness refuge will be remembered as one of the great environmental tragedies of the 21st century. It may also be seen as a violation of the most basic human rights of the Gwich'in people. All this will be taking place at a time when a majority of reputable scientists have warned over and over again of the urgent necessity to reduce our use of fossil fuels. In addition, the amount of money expected to be raised by this leasing has been vastly overestimated - it will have negligible effect on reducing our national debt and a huge effect on our national treasure. .

Although many parts of the North Slope have been leased in the past, this proposed lease, in the coastal plain of a critical and protected wildlife area, is very different in its impact: Every single tract that is under consideration for leasing in this coastal area within the Refuge contains sensitive habitat and resources that would be directly or indirectly threatened by drilling. Polar bears are already extremely threatened due to the effects of climate change. Drilling in this area would clearly threaten their habitat. A large herd of caribou within the refuge is relied upon in many ways by the Gwich'in people, both culturally and for physical survival. The rushed lease has not considered carefully enough the profound effects that drilling will have on this people and these endangered species.

I urgently ask that you remove tracts #1 - #32, of this call for nominations from consideration for leasing. The potential destruction of both the environment and culture are too great to move forward.

Thank you for your consideration of this request,

**Dr, Paul Rudenberg
Veterinarian, Westbrook Animal Hospital
Instructor in Pathophysiology, Southern Maine Community College**

12 Clifton Road

**Falmouth, Maine 04105
207 318 7937**

- I am opposed to leasing *any and all tracts* on the coastal plain.
- One of the specific 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. This DEIS must demonstrate adherence and that the lease sale will not negatively impact water quality and quantity.
- Water on the Coastal Plain of the Arctic Refuge is particularly scarce. There are few open lakes and rivers compared to the Western Arctic and especially in winter when the surface is frozen there is very little free water available. The BLM does no new analysis of how much water is actually available on the Coastal Plain and therefore does an insufficient job of analyzing impact to that water quantity.
- The DEIS avoids providing a clear estimate of how much water will be required, but if you piece together the information in the document, the figure is staggering. Center for American Progress did this and found that:
 - The DEIS estimates that drilling each well requires 420,000 to 1.9 million gallons of water. All of the alternatives have at least 17 'satellite pads' and 1 anchor pad. (Volume 2, Table B-5). And the DEIS estimates that 30 wells will be drilled from the average pad (Volume 2, B-17). So at least 540 wells would be drilled, requiring a total of **between 227 million and 1 billion gallons of water** just to drill the wells.
 - PLUS, every mile of ice road requires 1 million gallons of water (Vol. 2, B-13), each ice pad requires 500,000 gallons of water (B-12), and daily production of 50,000 barrels of oil would require 2 million gallons of water per day.
- In their comments on the NOI, US Fish and Wildlife Service emphasized concerns about the "cumulative impacts of all stages of oil and gas development" on water: "Water withdrawals from the streams, rivers and springs could have significant and detrimental implications to the populations and habitats of fish and wildlife." All of the action alternatives would affect large areas of polar bear critical habitat.
- There are currently just 900 Southern Beaufort Sea polar bears, and the population has declined approximately 50% in the last 30 years (Vol 1, p. 3-125). The use of land in the Coastal Plain for denning and as summer refuge for polar bears in the region has and will continue to increase with the loss of sea ice, pushing more and more polar bears to require the Refuge for survival.
- 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. 3-134).
- The DEIS acknowledges that "the potential for injury or mortality could be high when developing new oil and gas projects in polar bear habitat." (Vol 1, p. 3-142) Nevertheless, there is no estimate of the number of bears that could be killed, injured or displaced by the leasing process or seismic testing. The Coastal Plain provides vital calving and post-calving habitat for the Porcupine Caribou Herd (PCH). The Coastal Plain offers nutrient rich forage, protection from predators, and relief from the relentless insects of the Arctic.

- The PCH use all of the Coastal Plain for various habitat needs during its annual migration. The BLM acknowledges that oil and gas activities will likely disturb and displace caribou, especially sensitive cows and calves. Map 3-21 shows PCH calving and post-calving covering most of the Coastal Plain (Vol. 2, 3-21).
- BLM estimates that only 49% of the Coastal Plain is sensitive calving grounds for the PCH, but this vastly undercounts the value of the coastal plain to the caribou, who use essentially all of the Coastal Plain during calving and post-calving when they are sensitive to disturbance.
- The agency fails to adequately address these impacts and to consider the full range of areas that are important to caribou.
- Anything that moves the herd away from the Coastal Plain has been shown to be detrimental to calf survival (Vol 1, p. 3-114) and in fact would likely halt population growth (Vol 1, p. 3-115). Additionally, other potential calving areas to the east have a higher density of predators and less suitable vegetation.
- The DEIS offers insufficient mitigation of the impacts to PCH. Even the most restrictive alternative only halts "major construction activities"—but not drilling—for a single month of the year when caribou are calving (Vol 1, 2-13).
- The DEIS minimizes the potential for a spill by stating that "The probability of a spill over 100,000 gallons is low," because on the North Slope, "only three documented spills have been greater than 100,000 gallons." (Volume 1, p. 132)
- According to Center for American Progress, oil fields on the North Slope have averaged more than 400 oil spills per year, and across Alaska, there were 16 major spills from 2002 to 2016 that released at least 10,000 gallons of oil into the environment. Five of those spills released more than 100,000 gallons of oil.
- The BLM significantly underestimates carbon emissions that would result from drilling the Arctic Refuge, estimating only 56,739 to 378,261 metric tons of annual direct GHG emissions (from extraction, transport, etc) and 0.7 to 5 million metric tons of annual indirect GHG emissions (from combustion and downstream use of the oil) – measured in CO2 equivalent. (Volume 1, Table 3-5 p.78)
- This is a very misleading set of numbers and is calculated only from the increase from oil demand that the analysis predicts will result from developing the Refuge. It does not account for burning all of the oil they project will be extracted. That number is much larger. CAP estimates that the equivalent to the annual emissions of 16 coal fired power plants would be emitted – roughly 62 million tons.
- This document completely fails to assess how expanding oil and gas development in the Refuge will further exacerbate climate adaptation and mitigation challenges in an Arctic that is warming at twice the rate of the rest of the country.

Please stop the seismic testing, lease sale, and drilling in the Arctic Refuge. You must stop this for the sake of our world environment, the climate, and the future of our children.

Thank you!

Linda Huggins, Lansing, KS

To Alaska State Director Mr. Padgett,

I write this letter in opposition to the leasing of the coastal plain of the Arctic National Wildlife Refuge to oil drilling for the following reasons:

1. The permafrost peatlands of this area are invaluable intact as they sequester an enormous amount of carbon. The disruption of peatlands as well as the potential oil drilled and burned will further contribute to greenhouse gasses driving the climate crisis. It is indigenous people who are most vulnerable to climate change and with the warming of the arctic at least twice as fast as the rest of the country, keeping carbon in the ground is imperative.
2. The coastal plain is critical habitat for migrating birds and the Porcupine caribou herd which migrate there to calve. It is also polar bear habitat, an animal already severely impacted by anthropogenic climate change. The effects of oil leasing could have devastating effects on the migratory patterns of the animals and put stress on the survival of hundreds of species.
3. This land is sacred to the Gwich'in people and the caribou is vital to their food security and culture. Negative impacts on the caribou herds from oil and gas development will directly affect the indigenous peoples who have been a part of this ecosystem for millennia. Drilling on the coastal plain has long been opposed by the Gwich'in people. Ignoring their concerns violates human rights.

The coastal plain of the Arctic National Wildlife Refuge is a unique wild land; irreplaceable, invaluable, intact. ALL tracts of land should be left undeveloped.

Sincerely,

**Oceana Wills
59735 Sanford Drive
Homer, AK 99603**

December 14, 2020
State Director
Bureau of Land Management
Alaska State Office
222 West 7th Avenue, Mailstop 13
Anchorage, AK 99513-7504

RE: Arctic Refuge Public Comment

To Whom It May Concern:

Agencies of the Federal Government are required to comply with the NEPA Policy to "Encourage and facilitate public involvement in decisions which affects the quality of the human environment." (NEPA Section 1500.2 (d))

Due to the following BLM actions the EIS process fails to "facilitate public involvement":

- 1) No BLM officials are available by phone, email or in-person to answer questions, provide clarifications or respond to requests for hard copies of the DEIS. If this is due to the pandemic during which there is no way to provide information to the public, the BLM should not be rushing the process and the comment period should not begin until after reasonable public access is available.
- 2) In addition the BLM is only accepting paper comments; no email is allowed and there is no website comment form. This restriction limits public access as it shortens the ability to comment to less than 45-days since comments must be prepared well before posting. Mail deliveries are particularly slow during this holiday season
- 3) There is only 45 days allowed for public comment on the DEIS. A project of this magnitude requires a minimum of 90 days for public review. This comment period should extend until after the pandemic if the BLM is unable to provide information, materials and/or answer questions during the pandemic.
- 4) The scoping and drafting of the EIS was completed in only five months and does not involve a response to the +680,000 public comments submitted opposing the project during the scoping comment period. The five-month rushed process could not allow time for adequate review and analysis for impacts to 1) climate change in an area already experiencing serious warming, (2) living conditions and food sources for the indigenous people of the area, 3) wildlife including mammals, fish and migratory birds, 4) water quality and quantity .
- 4) At least five US Senators have submitted a written request to the Department of Interior questioning the short process period and requesting a 120 day comment period.

Janet Marx
112 Lockerbie Pl
Port Angeles, WA 98362
360-457-6605
janetmarx_76@msn.com

Comment from: Nancy Ostlie
Address: 263 Painted Hills Rd.
Bozeman, MT 59715
Ph: 406-556-8118
Email: nancyostlie@gmail.com

Please accept my comments on the Arctic Wildlife Refuge being proposed for oil and gas lease sales. Our organization, Great Old Broads for Wilderness, Bozeman Broadband, represents about 180 local supporters of conservation.

The tract numbers involved are numbered 1 through 32.

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. Fossil fuels and 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. It is the top challenge our world faces. The science is clear, and we are already suffering massive effects such as ocean acidification, ice cap and glacier melting, and storms, fires and floods that are far outside normal. 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. The Trump administration is not legitimate, and the legacy of actions to destroy our environment should be cause for criminal charges.

3. There is NO scientific evidence to support any benefit that OUTWEIGHS the HARMS to our public land, welfare, security and climate future. But there is scientific evidence that more likely than not, great harm to climate, wildlife, water, and public good will result 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 is emblematic of a "government" unhinged from the purpose of its existence. Our democracy is at stake when agencies no longer are accountable to the people.

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 deal 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. And government subsidies for solar and wind development are in the best interest of all citizens of the U.S., and importantly, for all people of the world who may suffer harm disproportionately.

Thank you.
Nancy Ostlie
Co-leader, Great Old Broads for Wilderness
Bozeman Broadband

Comment from: Gretchen Druliner
512 West Granite St
Butte, MT 59701
406 594 5937
druliner@gmail.com

To: State Director, BLM

Please accept my comments on the Arctic Wildlife Refuge being proposed for oil and gas lease sales. As required in the fine print on the guidelines for comment submission, I will note that the subject tract numbers involved are numbered 1 through 32.

I am 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 a 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 harm to climate, wildlife, water, and public good will result 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 is 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 deal for oil corporations who have corrupted our democracy and are destroying our planet.

15 December 2020

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.

8. The Indigenous communities whose land this once was are opposed to this sale and development.

This sale of leases and the ensuing development will impact this land with irreparable damage. Thank you for your time and consideration.

Regards,
Gretchen Druliner

Comment from Michele Dieterich, 2099 Silver Ridge Rd, Hamilton, MT 59840

Dear State Director, BLM

Please consider my comments on the proposed oil and gas lease sales in the Arctic Wildlife Refuge. The subject tract numbers involved are numbered 1-32.

I am completely shocked by the idea of opening up the Arctic Wildlife Refuge to oil and gas leasing, seismic testing, and allowing safety requirements to be waived for offshore drilling in the area. This is a Wildlife Refuge owned by the American people. Wildlife cannot speak for themselves and as in the past, the problems associated with drilling for oil and gas will force the American taxpayers to deal with the costs of clean up while the oil and gas industry runs away with the profits and leaves a mess in their wake.

Though there is little I can say to stop this abomination, I will try my best to participate in what is left of our democracy and try to stop a small number of wealthy oil barons from destroying a place so amazing it was given the designation of Wildlife Refuge. I would suggest that all Wildlife Refuges and roadless areas be designated as Wilderness by Congress so we can stop wasting our time and protect them as they should be protected.

We should be moving away from fossil fuels and carbon based energy sources. Our climate and humans cannot survive continued burning of fossil fuels. There is no reason to expand these dying industries especially at the expense of wildlife, wild places, and public health. Continuing to extract fossil fuels and use them is not in our best interest.

Right now the market for oil and gas is low. OPEC just discussed reducing production because prices are so low, so why open up drilling leases at this time. It makes no sense, not now nor in the future. This has been rushed through as a favor of the industry that backed and financed the Trump administration. The American public has no reason to pay his debts to his contributors.

Please show me the science or the economics that embraces drilling in the Arctic without cost to taxpayers the loss of pristine public lands, an increase in global warming, other than lining the pockets of current administration cronies.

What of the polar bears? What about our precious wildlife? There is no reason to open the arctic to oil and gas leasing.

The Arctic Refuge and all of its wildlife are held in the public trust. First do no harm. Our public land managers are misguided and probably politically pressured rather than relying on solid science with ground truthing to make decisions at this time. There is no reason to rush this through during the lame duck of the lame leader. We need to start worrying about clean water. These leases could result in harm to our clean water sources. Have you lived in the third world? I have. Clean water is a gift that should not be squandered.

Wilderness is irreplaceable. Certainly, it should not be sacrificed for a quick buck to a dying industry. This will not be an economic boon for taxpayers. If we focused on renewable energy and energy solutions, our country would not have to bow to the will of the oil industry. It is high time that we stood up to them and stopped giving them handouts. It is time to take back our country.

Thanks for considering my comments. I hope you stop this ridiculous plan.

Michele Dieterich

I am writing to express opposition to leasing all tracts on the coastal plain. As a wildlife professional who manages endangered species, I am opposed to leasing for oil and gas due to the many negative impacts this will have on wildlife. With climate change, there will be fewer arctic habitats, and destroying habitat so that oil and gas can be exploited is reckless. It will have a devastating impact on polar bears and migratory birds that rely on this area.

In addition, 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.

Thank you,
Katrina Dugan
62 Andrews Street
Staten Island, New York
10305

From: -Sylvia van Royen, B.S. Environmental Science and Management

I oppose the leasing of any and all tracts on the coastal plain of the Arctic National Wildlife Refuge on the following substantive grounds:

The scoping period, as well as the time period allotted for the creation, cumulation, and publication of all Draft Environmental Impact Statement documents has been insufficient. This process has failed to address the impacts on human rights and subsistence, water quality, caribou and polar bears and their habitat, oil spills, and climate change. The fact that the review of scoping and drafting of the EIS took only 5 months is indicative of its inadequacies--this process took 2 years for the Keystone XL Pipeline, and 1 year for offshore drilling in Santa Barbara, CA. Clearly 5 months is an inadequate time period for scientists, experts, and the public to weigh in on the EIS and for impacts to be fully considered.

The Coastal Plain is vital to the Porcupine Caribou Herd as calving and post-calving habitat, and the Gwich'in people of Alaska and Canada are culturally and spiritually connected to this herd. The Porcupine Caribou Herd is vital to the Gwich'in peoples' human rights and food security. Continued ignorance of these facts can and should be considered perpetuation of the historic cultural and physical genocide of Native peoples on the North American continent. Furthermore, the BLM's own analysis finds oil and gas leasing on the Coastal Plain will impact the Porcupine Caribou Herd but completely fails to connect this to the Gwich'in people's subsistence on this herd. A federal agency should not make such a failure in logic--if federal agencies are allowed to contradict or ignore logic in its assessments what is to stop them from ignoring logic in their pursuance of other legal regulations and requirements?

In order to properly analyze the impacts of this oil and gas lease on water quantity and quality, the BLM needs to conduct a new water quality/quantity analysis--climate change may have already impacted this scarce resource. It would be a serious misstep, and frankly un-scientific, to base impact analysis off old water data. Considering the vast quantities of water the installation of drilling wells, pads, and roads would require--according to the DEIS--the project would likely heavily impact any species relying on a precarious freshwater supply in the refuge. Please ensure a thorough scientific analysis goes into understanding the available freshwater in the Refuge, and consider the cascading impacts of drawing heavily on that water supply.

The Tax Cuts and Jobs Act of 2017 stipulated a 2,000 acre surface development limit on the Coastal Plain. Ask any U.S.F.S. Forester or Hydrologist, and they would tell you that installation of roads, pipeline, and gravel mines disturb the surface of the ground and would fall under surface disturbance. To consider these activities as non-surface-disturbances is negligent, ignorant, and possibly illegal under the 2017 law mentioned above and other laws impacting federal land management.

Globally, we are feeling the effects of climate change already--the intense fire season in the Western United States, the regular flooding of towns in Florida and Louisiana, and the increased frequency of extreme weather events. To continue to support the burning of fossil fuels by allowing their extraction on public lands not only flies in the face of decades of climate science, but also goes against the will of many Americans. The Federal government should be leading the country towards clean energy, not dragging us backwards. The DEIS completely fails to assess how expanding oil and gas development in the Refuge will further exacerbate climate adaptation and mitigation challenges in an Arctic that is warming at twice the rate of the rest of the country.

Thank you for your time, please consider allowing the Refuge to remain a Refuge among a country rife with public lands available for energy development that are not in use by critical wildlife and Indigenous communities.

**-Sylvia van Royen, B.S. Environmental Science and Management
(415) 654-7340 | svanroyenmcms@gmail.com | PO Box 890, Happy Camp CA 96039**

Dr. and Mrs. Daniel/Katie Dore

919.943.9168

katiedorepa@gmail.com

To: State Director, BLM

Please accept our comments on the Arctic Wildlife Refuge being proposed for oil and gas lease sales. As required in the fine print on the guidelines for comment submission, I will note that the subject tract numbers involved are numbered 1 through 32.

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. The following outline our concerns in more detail:

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 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 indicating HARMS to climate, wildlife, water, and public good will resulting from this proposal.
5. The proposed sale by the 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 is 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 deal 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.

In summary, your office and you can make a difference now. Once this pristine land is gone, it is too late. We are confident you will have the leadership and moral courage to believe in the future and protect what we have in the present.

Sincerely,

Daniel Dore

Katie Dore

Comment from:

**Linda Killion Healow
312 Clark Avenue
Billings, MT 59101-1721
(406) 672-8058**

To: State Director, BLM

Please accept my comments on the Arctic Wildlife Refuge being proposed for oil and gas lease sales. As required in the fine print on the guidelines for comment submission, I will note that the subject tract numbers involved are numbered 1 through 32.

I am adamantly 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.

Drilling and associated activities, include road building in the fragile soils of the Arctic Refuge. Rampant human activity will harm critical habitat for polar bears, migratory birds, and the birthing grounds of the Porcupine caribou herd. Fossil fuel production contributes to global warming. Drilling in the refuge also violate the rights of the Gwich'in Nation, which calls this rich ecological region "The Sacred Place Where Life Begins". These lands are rare in that they exist much as they have for millenia.

The Department of the Interior is actively making it difficult for public comment by keeping the comment window short and accepting only hard copy comments. This alone should negate the process. The comment period should be lengthened, and in consideration of the global COVID pandemic, e-mail comments are not only inclusive, but also necessary for citizen safety.

The DEIS is deficient, not allowing for adequate assessment of impact on water quality and quantity, Gwich'in human rights and subsistence, previously mentioned caribou and polar bear habitat, oil spills and our rapidly changing climate.

Also, please keep in mind that Federal law prohibits acting directors from serving while their nomination is pending. In October 2020, a Montana Federal Judge ruled that BLM Acting Director William Perry Pendley has been operating illegally as the BLM's de facto leader. This calls into question all decisions and actions Pendley has made over the last 14 months, while unconfirmed by the US Senate. In fact, there has been no Senate-confirmed Director of the BLM since January 2017.

Thank you for your consideration of the above comments.

Linda Killion Healow

Lindsay Carron
4070 Rosabell St. #1
Los Angeles, California 90066
414-530-2559
lindsay.carron@gmail.com

Comments for Bureau of Land Management for Call for Nominations and Comments for the Coastal Plain Alaska Oil and Gas Lease Sale

Bureau of Land Management,

I oppose leasing all tracts on the coastal plain to oil and gas development.

I visited Arctic National Wildlife Refuge in 2016 and again in 2017 as an artist in residence with US Fish and Wildlife Service. I built relationships with Gwich'in and Inupiaq people. I camped in the Brooks Range, observed musk ox, bear, and caribou and traveled to the Arctic Coast where I was fortunate enough to be amongst polar bears. What coincided afterwards was immense inspiration for my artwork and a deep commitment to making sure that this public land be available for the thriving of its species for generations to come. Arctic Refuge ignited inspiration within me as an artist. It was through that same kind of inspiration ignited within another artist, Olaus Murie, that the Arctic Refuge found its first protections in 1960. I understand that beauty, magnificence and awe are intrinsic values that are impossible to quantify. But I believe they qualify a place for protection. The Alaska National Interest Lands Conservation Act re-designated and expanded the Arctic Wildlife Range in 1980 with the following purposes:

- i. to conserve fish and wildlife populations and habitats in their natural diversity
- ii. to fulfill the international fish and wildlife treaty obligations of the United States
- iii. to provide the opportunity for continued subsistence uses by local residents
- iv. to ensure water quality and necessary water quantity within the refuge

These values and purposes are magnified in the context of the anthropocene where near every square foot of earth's surface has endured the impacts of human existence. These purposes are threatened and altogether ignored by the oil and gas lease sale on the Coastal Plain. The Environmental Impact Statement insufficiently addresses these original purposes and the Bureau of Land Management includes no new analysis for how extraction will further impact them.

A place intentionally kept wild and as buffered as possible from human scars is invaluable for scientific research, our understanding of the planet, and as a repository of clues for how we as a human species are to be resilient in the face of climate change. Impacting any portion of this land has a ripple effect on all of it. Seismic testing and oil well infrastructure would mar a landscape that so many beings depend on, from the 180 migratory bird species, denning polar bears, to the Porcupine caribou herd whose members birth a new generation on the tundra of the Coastal Plain year after year. These species are the backbone of the ecosystem. And these species are a way of life for the Gwich'in people. Oil and gas development in Arctic Refuge threatens their food security and right to live their traditional subsistence lifestyle. If the Porcupine caribou herd must relocate their calving grounds to avoid the extraction sites, they may endure significant risks to their ability to reproduce effectively, timely, and within the tight scope of their migration route. Within the last decade, indigenous people across Alaska have

witnessed significant changes to their subsistence resources and cycles leading to reduced availability and time frames in which to gather the resources they need to thrive. Furthermore, when a culture is formed around the practice of subsistence, a people's spirit and will to live is impacted by any reduction in their ability to practice their ties to land. Not only do the lives of the Gwich'in people rely upon the caribou and the land, their spirit does as well.

I believe that the spirit of humanity as a whole relies on the existence of untamed places. Places where our egos surrender to the elements, our minds are set free by the immeasurable vastness, and our hearts soar with the inspiration imbued from its ancient cycles. To merely know this land exists is a gift. To know that it could forever be scarred by an industry that absolutely needs to phase out (because our existence depends on it doing so) is a threat we cannot bear. Expanding oil and gas development in the Arctic will exacerbate climate challenges in an Arctic warming twice as fast as the rest of the country. The Environmental Impact Statement downplays the unacceptable climate impacts of extraction in the Arctic. We cannot afford to ignore the significance of the last intact Arctic ecosystem in the mitigation of climate change on a global scale. Melting permafrost in the Arctic contributes methane and carbon dioxide to the atmosphere. It is estimated that the melting of the world's mountain glaciers has fueled up to 30 percent of sea level rise, with Alaska as the single largest contributor. Rising seas threaten to displace people around the globe bringing millions into the category of climate refugees. The world depends on an intact Arctic. The world depends on the phasing out of extraction of fossil fuels. To defend the Arctic Refuge is to defend the right for life to prevail.

Sincerely,
Lindsay Carron

Dear Director Padgett,

I am writing you today regarding BLM's proposed leases in the Arctic National Wildlife Refuge. **My comment is in reference to all tracts included in the lease proposal.**

This past summer, Oregonians experienced conflagrations now called the "Labor Day Fires." I live in Bend, where we couldn't go outside for more than two weeks without endangering our health. Many of my neighbors on the "wet side" of the Cascade Crest lost their homes. A few Oregonians lost their lives in these fires. Forest ecologists and fire managers attribute the intensity with which these fires burned primarily to climate change.

Climate change is caused by the combustion of fossil fuels which releases carbon and other greenhouse gases into the atmosphere. These gases cause the Earth to warm. This warming, in turn, changes weather patterns and causes global havoc. Our job as responsible citizens of our planet is to reduce our dependence on fossil fuels, including the possible oil deposits in the Arctic National Wildlife Refuge.

Much prime wildlife habitat was destroyed in Oregon's climate-driven intense wildfires. The Arctic National Wildlife Refuge is pristine and irreplaceable habitat. Again, we should be protecting such resources, not drilling in them for short-term economic gain. These lands are uniquely valuable as calving grounds for caribou, breeding grounds for migratory birds, and wild places that feed the human soul. Humans have already caused the extinction of countless species. When we know better, we need to do better.

To summarize, I am writing to express my strong disagreement with the possible sale of oil and gas leases in ANWR. Drilling will exacerbate climate change, resulting in more and worse wildfires which will continue to impact me and all residents of forested areas in the western United States. Drilling will also irrevocably destroy irreplaceable wildlife habitat, harming animals and plants already facing threats from climate change and population growth.

Thank you.

Sincerely,

Barbara E. Morris

**1829 NE Berg Way
Bend, OR 97701**

**barb@barbmorris.com
541-326-5374**

December 8, 2020

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

Dear State Director,

I am responding to the "call for nominations" for leasing in the Arctic National Wildlife Refuge, issued Nov. 17. I believe that this action presents numerous problems that require further analysis, and I would like to tell you why.

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.

These tracts are all part of a sensitive habitat. Also, resources would be threatened by drilling, including 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.

The coastal plain is held sacred by the Gwich'in Nation, who have depended on this special place and the wildlife within it for their food security and way of life for generations.

I urge BLM to remove tracts #1 - #32, identified in the call for nominations, from consideration for leasing. The potential destruction of both the environment and culture are too great to move forward.

Thank you for your consideration,

Siincerely,

**Jacquelyn Markham, Ph.d.
Beaufort, SC 29902
jacquelynmarkham@hotmail.com**

Kristine Gilbert
3208 Monte Vista Place
Davis, CA 95618
(530) 321-5495
kgilbert.sierra@gmail.com

10 December 2020

Dear Director Padgett,

The recent "call for nominations" for leasing in the Arctic National Wildlife Refuge (Refuge), issued Nov. 17, 2020, 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, hundreds of bird species, and the Porcupine caribou herd, upon which the Gwich'in people rely for their subsistence and culture. This rushed process has ignored concerns about threats to the Gwich'in people, threatened wildlife, and global climate.

The Arctic is already feeling the effects of climate change more than other parts of the world, warming at twice the rate of the rest of the country. Expanding oil and gas development in the Arctic will further exacerbate climate adaptation and mitigation challenges in an Arctic and globally. The EIS for oil and gas leasing on the coastal plain downplays unacceptable climate impacts of extraction in the Arctic.

As sea ice recedes due to warming temperatures, land denning sites in the Arctic Refuge become increasingly important. According to FEIS Maps 3-37, leasing tracts #1-#32 would have unacceptable impacts on denning polar bears and polar bear critical habitat.

An original purpose of the Arctic National Wildlife Refuge as established in the Alaska National Interest Lands Conservation Act (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 protected federal lands in Alaska are a significant boon to Alaska tourism and the State's economy. I have returned time and again to Alaska because of the protected natural systems, travelling all over the state, bringing my tourist dollars with me. As a scientist and educator who works with young adults who are interested in environmental systems, I encourage my students to save their money so that they can do the same.

Tracts 1-32 (over 99% of the coastal plain) are visible from high points within the federally designated Wilderness portion of the refuge. The negative visual impacts on Wilderness

recreation in the Arctic Refuge negate the original wilderness and recreation purposes of the Arctic Refuge as established in ANILCA.

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, including 21 flocks of Snow Geese (see FEIS Maps 3-26). BLM is disregarding impacts to birds by planning oil leases in the Arctic Refuge.

Tracts 1-5, 7-10, 12-14, 18, and 20-24 hold critical calving and post-calving habitat for the Porcupine caribou herd, and therefore must be removed from consideration for leasing (see FEIS Maps 3-35 and 3-29).

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.

Tracts 7, 27, 29, 31 and 32 should be excluded from oil leasing, as they include essential habitat for Arctic Cod (see FEIS Maps 3-19).

I urge BLM to remove tracts #1 - #32, identified in the call for nominations, from consideration for leasing. The potential destruction of the environment, culture and tourist economy are too great to move forward. Thank you for your consideration.

Sincerely,

Kristine Gilbert

William Tyukayev
2739 Camero Drive
Lincoln, CA 95648
(916) 626-0079
williamtyukayev02@gmail.com

11 December 2020

The recent "call for nominations" for leasing in the Arctic National Wildlife Refuge (Refuge), issued Nov. 17, 2020, 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 nationally 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 Alaska native 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, hundreds of bird species, and the Porcupine caribou herd, upon which the Gwich'in people rely for their subsistence and culture. This rushed process has ignored concerns about threats to the Gwich'in people, threatened wildlife, and global climate.

The Arctic is already feeling the effects of climate change more than other parts of the world, warming at twice the rate of the rest of the country. Expanding oil and gas development in the Arctic will further exacerbate climate adaptation and mitigation challenges in an Arctic and globally. The EIS for oil and gas leasing on the coastal plain downplays unacceptable climate impacts of extraction in the Arctic.

As sea ice recedes due to warming temperatures, land denning sites in the Arctic Refuge become increasingly important. According to FEIS Maps 3-37, leasing tracts #1-#32 would have unacceptable impacts on denning polar bears and polar bear critical habitat.

An original purpose of the Arctic National Wildlife Refuge as established in the Alaska National Interest Lands Conservation Act (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.

Listed as the foremost purpose of the Alaska National Interest Lands Conservation Act (ANILCA), 16 U.S.C § 101 (a) (1980) intends to, "preserve for the benefit, use, education, and inspiration of present and future generations certain lands and waters in the State of Alaska that contain nationally significant natural, scenic, historic, archeological, geological, scientific, wilderness, cultural, recreational, and wildlife values..." Taking a stance against the recent "call for nominations" in the Arctic National Wildlife Refuge (ANWR) is of the utmost personal importance to me. Not only have I personally benefited from refuge's historic, scientific, natural, geological and scenic attributes, I wish to see the same natural gifts preserved for all

future generations who follow. Each proposed Tract threatens to diminish, perhaps irreversibly so, a vital component of Arctic National Wildlife Refuge, as is listed in Alaska National Interest Land Conservation Act.

Tracts 1-32 (over 99% of the coastal plain) are visible from high points within the federally designated Wilderness portion of the refuge. The negative visual impacts on Wilderness recreation in the Arctic Refuge negate the original wilderness and recreation purposes of the Arctic Refuge as established in ANILCA.

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, including 21 flocks of Snow Geese (see FEIS Maps 3-26). BLM is disregarding impacts to birds by planning oil leases in the Arctic Refuge.

Tracts 1-5, 7-10, 12-14, 18, and 20-24 hold critical calving and post-calving habitat for the Porcupine caribou herd, and therefore must be removed from consideration for leasing (see FEIS Maps 3-35 and 3-29).

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 sacred, and the place where life begins. It is critical to their human rights, and food security.

Tracts 7, 27, 29, 31 and 32 should be excluded from oil leasing, as they include essential habitat for Arctic Cod (see FEIS Maps 3-19).

I urge BLM to remove tracts #1 - #32, identified in the call for nominations, from consideration for leasing. The potential destruction of the environment, native culture and tourist economy are too great to move forward. Thank you for your consideration.

Sincerely,

William Tyukayev

Gabrielle Stadem
1744 Greengate Street
Yuba City, CA 95991
(530) 845-8519
gmstadem@gmail.com

Dear Director Padgett,

The recent "call for nominations" for leasing in the Arctic National Wildlife Refuge (Refuge), issued Nov. 17, 2020, 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, hundreds of bird species, and the Porcupine caribou herd, upon which the Gwich'in people rely for their subsistence and culture. This rushed process has ignored concerns about threats to the Gwich'in people, threatened wildlife, and global climate.

The Arctic is already feeling the effects of climate change more than other parts of the world, warming at twice the rate of the rest of the country. Expanding oil and gas development in the Arctic will further exacerbate climate adaptation and mitigation challenges in an Arctic and globally. The EIS for oil and gas leasing on the coastal plain downplays unacceptable climate impacts of extraction in the Arctic.

As sea ice recedes due to warming temperatures, land denning sites in the Arctic Refuge become increasingly important. According to FEIS Maps 3-37, leasing tracts #1-#32 would have unacceptable impacts on denning polar bears and polar bear critical habitat.

An original purpose of the Arctic National Wildlife Refuge as established in the Alaska National Interest Lands Conservation Act (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.

Personally, I have plans to travel to Alaska next year, to show my children the undeveloped wilderness that the United States has fought so hard to protect. Tracts 1-32 (over 99% of the coastal plain) are visible from high points within the federally designated Wilderness portion of the refuge. The negative visual impacts on Wilderness recreation in the Arctic Refuge negate the original wilderness and recreation purposes of the Arctic Refuge as established in ANILCA. The damage that these new leases will cause to the recreation community, and to people's desires to travel to your state, will be extreme.

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, including 21 flocks of Snow Geese (see FEIS Maps 3-26). BLM is disregarding impacts to birds by planning oil leases in the Arctic Refuge.

Tracts 1-5, 7-10, 12-14, 18, and 20-24 hold critical calving and post-calving habitat for the Porcupine caribou herd, and therefore must be removed from consideration for leasing (see FEIS Maps 3-35 and 3-29).

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.

Tracts 7, 27, 29, 31 and 32 should be excluded from oil leasing, as they include essential habitat for Arctic Cod (see FEIS Maps 3-19).

The Bureau of Land Management has always been a steadfast advocate for multi-use lands that allow for development and industry advancement but insist on the long-term preservation of our nation's natural treasures and special places. I am asking that you fulfill your mission statement

and commitment to the American people by protecting our land, now, and for future generations. I urge BLM to remove tracts #1 - #32, identified in the call for nominations, from consideration for leasing. The potential destruction of the environment, culture and tourist economy are too great to move forward. Thank you for your consideration.

Sincerely,

Gabrielle Stadem

To whom it may concern,

I am writing to express my strong opposition to the leasing of all tracts across the Arctic National Wildlife Refuge's coastal plain.

My concerns are many-- the rights of the Arctic Indigenous peoples, food security, water quality, the environmental impact, the climate impact, and the impact on wildlife-- such as polar bears, caribou, birds and fish in the area.

Expanding oil and gas development in the Arctic will most certainly exacerbate climate adaptation and mitigation challenges in this region that is warming at twice the rate of the rest of the country. The BLM has significantly underestimated the carbon emissions that would result from drilling the Arctic Refuge. The numbers they report are misleading at best and does not account for burning all the oil they project will be extracted. The CAP estimates that the equivalent to the annual emissions of 16 coal fired power plants will be emitted-- roughly 62 million tons. We cannot afford to let this happen.

In addition, I feel that the risk of oil spills are dramatically understated in the DEIS, I feel that impacts on the water quality and quantity in the region have been either poorly evaluated or poorly represented to the public. Maybe both.

This coastal plain region is habitat to many important species-- millions of birds, fish, and other wildlife. I am unconvinced that the impact on this habitat and the wildlife would be anything but negative. There are only 900 Southern Beaufort Sea polar bears in existence-- that population dwindled by about 50% in the last 30 years alone. Their dependence on the land in this region will continue to increase. We need to ensure this land is available and safe for this purpose among many many others.

This area is sacred to the Gwich'in peoples indigenous to the region and beyond. They also rely on the natural resources here for their health and wellbeing-- all under brutal attack from the global pandemic at levels far above what many of us see in our regions.

This land was first federally protected by President Eisenhower in 1960. In addition to the 200,000-count Porcupine Caribou Herd, it is home to musk oxen, wolves, polar bears, and nearly 200 species of migratory birds that eat, molt, and nest in the Refuge en route to and from six continents and all 50 states. For almost 60 years, the American people and Congress have continually reinforced the fact that the Arctic Refuge is worthy of protection. It is no place for drilling.

It is our moral obligation to protect this landscape for future generations to experience, enjoy, and rely upon. The impacts of drilling in the Coastal Plain would be irreversible; this untrammeled landscape containing intact ecosystems, millennia of human tradition, and a legacy of international and inter-cultural support for continued protection, will be irrevocably transformed in ways we cannot predict.

I stand in strong opposition to oil and gas development in this region. I stand in strong opposition to the lease of all tracts of land in this coastal plain region.

Kelin Kushin
569 Gap View Blvd
Harpers Ferry, WV 25425
208-310-1548

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

10 December 2020

Dear BLM Officials,

I am writing to express my opposition to opening up the pristine Arctic National Wildlife Refuge's coastal plain for industry to bid on oil and gas leases. Drilling in the Arctic Refuge will:
Harm critical habitat for polar bears and migratory birds;

Contribute to global warming; and

Violate the rights of the Gwich'in Nation, which calls this rich ecological region "The Sacred Place Where Life Begins".

I am also opposed to the accelerated timetable in pushing these bids through before the Trump administration leaves office. This timeline represents a handout to the fossil fuel industry at the expense of our public lands, Native people, and our climate.

I am opposed to the shortcuts in the leasing process and in the deeply flawed environmental review. The Arctic 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.

**Sincerely,
Judith Chamberlin
700 Sabeta Dr.
Ridgway, CO 81432
judichamberlin@gmail.com
240-454-1399**

Greetings,

I'm writing today to express my dismay and opposition to opening the Arctic National Wildlife Refuge for bidding on oil and gas leases, seismic testing, and waiving safety requirements.

First and foremost, the area in question was long ago designated as a NATIONAL WILDLIFE REFUGE, and therefore should be honored as such and not modified for the benefit of anyone for any other purpose. The fact that it is a national refuge gives me the right and the obligation as a citizen to speak out in defense of this national treasure. Industrial activity is contrary to the intent of the purpose of setting aside this landscape.

GLOBAL WARMING

It is well documented that the Arctic is warming even faster than the rest of the planet, so any industrial-scale incursions such as that proposed will almost certainly have de-stabilizing effects on an already stressed ecosystem that is critical to not only local flora and fauna, but also globally on migrating bird populations.

WATER QUALITY

I also have concerns that the DEIS has been rushed, and is therefore incomplete at best and inaccurate as to the impact on the area's water quality, and even the quantity, since the proposal does not adequately address the volume of water necessary to oil and gas production. This, in turn, impacts negatively wildlife habitat and the ability of the native Gwich'in people to thrive.

HUMAN RIGHTS

In regards to the Gwich'in, it should be inconceivable to any American (or Canadian) to undermine not only the wishes of the majority of yet another group of indigenous people, but also their way of life.

SAFETY CONCERNS

Relaxing or waiving the safety requirements of oil and gas extraction will increase both the likelihood and the extent of industrial-scale mishaps, i. e., oil spills and the catastrophic damage they do to the entire region affected. This seems not to be adequately addressed in the DEIS.

In conclusion, I am strongly in favor of Alternative A: no action!

Thank you for this opportunity to comment.

Sincerely,

**Joyce Stransky
1717 W Meadow Rd
Durango CO 81303**

**970-247-8795
cjrafterj@gmail.com**

Karen Fields
2331 42nd Ave SW Apt 315
Seattle, WA 98116

December 5, 2020

Dear State Director,

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.

I have had the privilege of rafting the Kongakut River in the Arctic Refuge and was awed by the untouched wilderness. After traveling to all 7 continents there are very few places left on earth that are still untouched. The wilderness itself in its pristine state is of far more value than anything extracted from the area. There is no way to set foot upon this land and not change the landscape forever.

Every tract 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.

I urge BLM to remove tracts #1 - #32, identified in the call for nominations, from consideration for leasing. The potential destruction of both the environment and culture are too great to move forward. Please do not follow the direction of an administration that has handily been rejected by the American people.

Thank you,

Karen Fields

Dear Bureau of Land Management,

I stand with the Gwich'in Nation in opposition of leasing any of the Arctic National Wildlife Refuge's coastal plain for oil drilling. There is a reason that this area was designated as a Wildlife Refuge in 1960, and why it has remained under protection since. This current administration has also demonstrated a complete disregard and disrespect for the environment, scientific data, due process, and has been rushing this through simply for the sake of being able to put his name on it. The Gwich'in people have called this place home since time immemorial, for them it is a sacred place where life begins, "Iizhik Gwats'an Gwandaii Goodlit." They depend on the Porcupine Caribou Herd for their food and way of life, and in turn it is the soul of their culture and beliefs. This is also home for nearly 200 species of migratory birds, many of which travel the globe to reach this destination. This area is additionally home to endangered species such as polar bears, as well as other mammals like muskox and wolves; all of which live in a delicate balance.

Any impacts that occur in this area, due to oil and gas drilling, will be irreversible. The prepared Environmental Impact Statement was conducted and drafted over an inadequately short five-month period to really understand and demonstrate the impact that this can have on the environment, the animal species that live in this area, and the Gwich'in people. Even the process of studying and reviewing the impact of a potential natural gas pipeline that was proposed to mostly parallel the current gas pipeline-- an area that is already accessible-- took place over several years. The coastal plain of the Arctic National Wildlife Refuge is much more remote, and its ecosystems much more sensitive.

The remoteness of this location for oil and gas drilling also means that creating access to that area will have a much broader impact on the land and its inhabitants. Gravel mining was additionally excluded from being considered a part of the infrastructure for drilling, which means that the impact on the environment will thus be even greater than shown in the EIS. The cost of creating access to this area, in addition to establishing drill sites and transporting oil, is likely to mean profits from the oil extracted in this area will be marginal. We must also not forget the "cost" of carbon emissions!! Additionally, BLM has already made other lands available for lease for oil drilling that have yet to be used.

Let's also not forget about oil spills that have occurred since drilling began in Alaska. We are all aware of the Exxon Valdez oil spill in 1989, and the devastation that caused. While none have been as devastating as the '89 spill, there were 16 major spills reported from 2002-2016 which released at least 10,000 gal of oil, as shown in the 2016 report produced by Pacific States/British Columbia Oil Spill Task Force; including a major spill in 2006 which released 267,000 gallons of crude oil. Additionally, they reported over 1,300 "minor" (less than 42 gal) oil spills in Alaska during this period. While some of these spills were due to human error or equipment failure, the vast majority of these were due to organizational/management failure. We cannot afford these kinds of risks in the Arctic Refuge coastal plain.

Lastly, let's not forget to consider the visual impact that this will have on this sacred area. What makes Alaska so amazing for those who live here or dream of visiting is the pristine wilderness. If you have ever been to Prudhoe Bay, AK you have seen the ugliness of the oil field and felt the sting of chemicals in your eyes and throat. This should not be the fate of the migratory birds, endangered polar bears, the Porcupine Caribou Herd and their new calves, nor the Gwich'in people.

As a life-long Alaska and outdoors woman, I stand with the Gwich'in people and ask you to please not open the Arctic National Wildlife Refuge coastal plains for oil drilling. This, along with Pebble Mine in the Bristol Bay region, could be our greatest mistake.

Thank you,

**Holly Dean
3985 Parks Ridge Rd
Fairbanks, Alaska 99709
hdean0212@gmail.com**

11/23/20

To the State Director of the Alaska BLM office,

I am an Alaska resident who is opposed to leasing all the tracks listed in the Coastal Plain of the Arctic National Wildlife Refuge (ANWR) for oil and gas sales. There is nowhere like the Coastal Plain in ANWR left in our country and oil and gas development threatens to change it forever using a rushed NEPA process that overturns the current protection of the land and its inhabitants.

One great concern is how water quality and quantity will be preserved for both the people who live in the area and the wildlife which depends upon it. A stated 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. In the coastal plain, there are few open lakes and rivers compared to the Western Arctic and in winter there is little free water available. The BLM offered no estimate and analysis of the cumulative impact of the operations of exploration and drilling on the water supplies – or how much water is available on the Coastal Plain during different seasons. The water is vital for the fish, migratory birds and other wildlife that depend upon the Refuge for survival.

Another reason I oppose leasing tracks 1, 2, 3, 4, 5, 7, 9, 8, 10, 12, 13, 14, 18, 20, 21, 22, 23, 24 is they are critical habitat for the Porcupine Caribou Herd. Your own EIS maps show how important the coastal plain is for the caribou for both calving and post-calving grounds. This herd is essential for the way of life of the Gwich'in people and these proposed tracks are important for the overall health of the herd. To lease these tracks of land ignores the concerns of the native Alaskans who depend upon these natural resources and their human rights to continue living off the land they have for thousands of years.

Overall this entire process has been rushed through with arbitrary deadlines that have more to do with political pressure rather than proper public process or review. Delay the sale of leases until you have addressed the problematic parts of the EIS such as the water availability, the health of the caribou herd, polar bear denning disturbance, and the public health of those communities directly affected by the development.

Thank you for the opportunity to comment on these leases.

Sincerely,

Jessica Toubman

jesstoubman@hotmail.com
Milepost 229 Parks Highway
Denali Park, AK 99755
907-683-6011

To Whom it concerns,

I want these comments included in the record of decision against the nomination of all tracts on the coastal plain of the Arctic National Wildlife Refuge for oil leasing.

I have followed this issue for decades. I have been leading commercial rafting and backpacking trips across the coastal plain of the Arctic Refuge since 1976. Leases anywhere within the 1002 area will seriously harm my business & my livelihood.

I have led paddle rafting, kayaking & canoeing trips across the coastal plain within the 1002 area on the following rivers: the Canning River, the Hulahula River, The Jago River & the Aichilik River. Lease sails in any of these tracts will seriously impact my business.

I have also led backpack trips on the coastal plain of the Arctic Refuge in many of these tracts. There is no way anyone would want (or even be allowed) to backpack through oil leasing areas.

The impacts upon my business, and my clients will be prohibitive. It is highly unlikely I will be able to operate anywhere in the 1002 area if any of these lease sales proceed. The impacts upon the land and upon the animals, as well as upon my clients and my business will be deathblow to my business.

Despite my concerns, which I addressed in the EIS process, the affects of leasing on my business and upon my clients was not addressed in the EIS process. There was no tally of the economic impacts leasing would have on my business or businesses like mine. In fact, there was not even a list of outfitters and guides that operate in the 1002 area included in the EIS. Nor was there a tabulation on the number of visitor days that would be impacted, even though these figures are publicly available through the US Fish & Wildlife Service.

There was no attempt to determine the number of outfitters, or the number of people that float across the 1002 area, or that backpack across this area. There was no mention of the number of air taxi operators that fly these visitors in and out of the Arctic Refuge. There was no attempt to even list the number of commercial hunting guides that use the 1002 area, or the number of hunter days of use that occur in the 1002 area.

There was no attempt to determine the number of independent parties that use the 1002 area for hunting or recreation, on their own. There was no attempt to determine the number of visitor days of this personal use within the 1002 area or within any of these lease tracts. The EIS does not mention the numbers of recreational users impacted for any of these tracts, even though this information is available through the US Fish & Wildlife Service.

The EIS process is totally deficient of statistics to indicate the impacts leasing will have on these businesses and these private parties.

These lease sales must be stopped until a more thorough job has been completed determining the impacts upon all these businesses and users.

Sincerely, Ronald A. Yarnell
1231 Sundance Loop
Fairbanks, AK 99709
ronaldyarnell@icloud.com
907-451-8148 (home)
907-347-5251 (cell)

To the State Director of BLM, Alaska Office:

November 22, 2020

Comments on the proposal to lease the Arctic NWR Coastal Plain for oil development:

The coastal plain portion of ANWR is approximately 1.5 million acres in size, and represents about 5% of the coastal plain north of the Brooks Range. Virtually all of the 95% not within the Refuge is already open for oil exploration and development. Giving this relatively small area Wilderness status would permanently protect a complete arctic ecosystem from the shoreline on the Beaufort Sea coastline, south across the coastal plain, through the foothills and the north slope of the Brooks Range (it's all tundra from the divide north to the Beaufort Sea), and sweeping down the south slope to the boreal forests and the northern floodplain of the Yukon River. Most of this area looks as it has for thousands of years, and it is ecologically complete and intact with a full suite of life including a complex of top-level predators. Why would it hurt to develop the coastal plain portion? The coastal plain is the main calving area for the 200,000-strong Porcupine Caribou Herd, a herd that is a vitally important subsistence resource for the Gwich'in Athabascans Indians that live south of the Brooks Range in Alaska and Yukon Territories (where the caribou herd winters). The herd concentrates on the coastal plain during a mass birthing in early June, and the cows tend to their young and try to protect them from a whole host of predators (brown bears, wolves, wolverines, and Golden Eagles converge for this annual feast.) The caribou are also an important subsistence resource (second to bowhead whales) for the Inupiat Eskimos of the Alaska North Slope. Despite the deliberate misrepresentations of the affected area (particularly by the former Secretary of Interior under George W. Bush) and research done on caribou response to oil pipelines (by multiple pro-development administrations), a prominent caribou researcher told me that pregnant females and females with calves stay away from oil pipelines (based on work done in the Prudhoe Bay area).

The enlarged text within quotation marks below is an excerpt from the scientific journal, *Applied Animal Behaviour Science* February 1991, Pages 279-291 Volume 29 Issues 1-4:

"The 1980s have witnessed expansion of most of the major caribou and wild reindeer herds throughout circumpolar areas, including the Central Arctic Herd near the Prudhoe Bay oil field. Behavioral reactions of caribou to oil development have included discontinued range use; avoidance of pipelines, roads, and other oil field structures by female caribou accompanied by calves; habituation to oil field structures and activities by adult males; delayed movements to and from insect-relief habitats; seasonal fracturing of a herd."

Because the calving area on the coastal plain of the Refuge is much smaller (than that available to the Central Arctic Herd near Prudhoe) and more confined by hills and mountains and proximity to the coast, a spider web of pipelines connecting production wells, and associated structures and airfields, would very likely have disastrous short and long-term consequences for the herd due to displacement of pregnant cows from a large proportion of the calving area. The entire ecosystem would suffer from the loss of this keystone species. The nutrient cycling resulting from the foraging and elimination (feces and urine) activities of such a large herd provides a huge input of nutrients that fuels a massive production of invertebrates that enable millions of birds to reproduce and prepare for migration successfully. In addition, associated predator populations and subsistence hunters would be very detrimentally affected.

The area has become increasingly important to denning female polar bears and their cubs as winter sea ice has decreased and forced them to seek den sites on land. The population is

already declining and the proposed winter seismic work by Kaktovik Inupiat Corporation will threaten denning bears.

The coastal plain is also an important migration area for Yellow-billed Loons and nesting and migration habitat for a host of different shorebird species (for example: Buff-breasted Sandpiper, Black-bellied Plover, American Golden Plover, Semipalmated Plover, Pectoral Sandpiper, Semipalmated Sandpiper, Long-billed Dowitcher, Stilt Sandpiper, Red and Red-necked Phalaropes, Bar-tailed Godwit, and Baird's Sandpiper.) The coastal plain is important in some years for as many as 350,000 Lesser Snow Geese (that nested in a western Canada colony) to fatten on sedge rhizomes before migrating south.

Having worked on the coastal plain for 3 years as a Wildlife Biologist for Arctic National Wildlife Refuge, I have witnessed much of what I described above. I can tell you with complete conviction that what you are proposing through this sham process is unethical, inconsistent with the Congressionally-mandated purposes of the Refuge, inconsistent with normal public input procedures, an environmental crime, and a tragedy for the ages. I can assure you that any company foolish enough to lease any of this area will be met at every juncture with protests, public sanctions and legal obstacles and will pay dearly for having done so.

Sincerely,

Russell M. Oates, Chief (retired), Division of Migratory Bird Management, US Fish and Wildlife Service, Alaska Region

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

Re: Comment on Call for Nominations Coastal Plain Lease Sale

Dear Mr. Padgett:

Thank you for the opportunity to comment on the Coastal Plain nomination process for Oil and Gas leases within our nation's premiere national wildlife refuge – the Arctic National Wildlife Refuge.

I am strongly opposed to the offering of *any* tracts within the Coastal Plain for lease. My position is based upon the following concerns:

1. A primary societal response to mitigate the present climate emergency is the phasing out of dependence upon and utilization of oil and gas fossil fuels by our society over the next couple of decades. It is senseless to sacrifice natural resources such as polar bear and caribou habitat in this wildlife refuge for a non-renewable resource we will no longer be using in the foreseeable future, *and for which there is no shortage now*. Projected lease proceeds are more likely to be in the tens of millions instead of hundreds of millions of dollars, making this a horrible tradeoff of lost wilderness values for minimal financial ones. The Arctic National Wildlife Refuge is more valuable as it is; damage from leasing activities can never be fully mitigated nor repaired. In addition, the real cost of carbon impacts from producing more fossil fuels from northern Alaska are not properly numerated nor addressed in this planning process. Stop ignoring the costs.
2. The survival of the Arctic's Indigenous peoples is dependent on a healthy ecosystem. Oil and gas leasing on the Arctic Plain is a double threat. First – it damages caribou calving grounds for the Porcupine Caribou Herd – a primary subsistence food central to the nutrition and culture of the local people. The second threat is the additional contribution to the climate emergency from carbon-based fuels proposed to be extracted from these tracts. Fossil fuels are a failed path to sustainability and are being phased out. Climate change is an existential threat not just to the well-being of Indigenous people's way of life, it also is leading to ecosystem collapse world-wide.
3. It is time to transition to renewable energy sources and quickly phase-out fossil fuels. Leasing in the Coastal Plain does nothing to support required responses to addressing the climate emergency. The Environmental Impact Statement insufficiently considered the relationship between promoting oil and gas leasing on the Coastal Plain and our future sustainability as a society.

Please reconsider what is at stake to be lost, do what is right and cancel this lease nomination.

Sincerely,



James Schwarber
P.O. Box 84074
Fairbanks, AK 99708

Dear Sir/Madam:

I oppose leasing all tracts on the coastal plain. I have been there. I have hiked more than 100 miles in several river drainages in the Refuge. It is the most special place I have ever seen, and I have been all over the world. Some call it America's Serengeti.

This land will be forever changed for the worse should roads be built, landing sites constructed, and drilling allowed. The native peoples and the native animals have no place to go should this area be "developed." There will be oil spills, because there are always oil spills. There will be pollution by those who live and work there, because such pollution is unavoidable. There will be noise which doesn't belong.

In the 21st century, fresh water is going to be more valuable than ever, not only for human consumption, but for the ecosystems that we depend upon. The fresh water rivers in the Refuge run free and clear, unpolluted, and wild. They provide recreation for people who come to visit then leave, with no permanent impact upon the land. Drilling will despoil the water, too. It always does.

Apex predators such as polar bears, already under the gun with ice melt due to climate change, will not be able to tolerate large swaths of the Refuge to be occupied and worked, in the name of perhaps oil, perhaps not, which we need as a people to transition away from, not look to find ever more, to run an economy which will have to become more dependent on other non-carbon sources if we are to survive this century as a country and as a species.

The indigenous peoples have enough problems now without the promises of wealth that disappear, replaced by destroyed, ruined land, no longer productive of those species that the natives depend upon.

It is right and proper that those who propose leasing be honest and upfront about environmental impacts, which has most certainly not been the case in some other places in the Lower 49. We aren't just talking animals, although that should be enough. We are talking about people's livelihoods.

Not everything can have a price tag put upon it. I know how much I paid to travel to the Refuge twice. What I can't calculate was the benefit to me to have seen the beauty, the wildlife, and open country, places that for days I could walk through—all wild—knowing I would never see it again, but by God, I did see it once, and this is part of every American's birthright, not just a few. I can't put a price tag on the midnight Sun, well above the horizon, walking for miles on augeis, seeing snow on Bathtub Ridge, Dall Sheep 20 feet above me, caribou's walking close enough for me to touch, a wolverine running by my tent, and every square inch of the tundra alive in June, hurrying to complete the reproductive part of its life cycle before the snow.

Please do not drill for oil and gas here. You can only destroy some of the finest wilderness in the world, and we can never remake it once it is gone. Oil and gas are from the last century; we need to move on, and we need wild places where people can visit, but not remain.

Sincerely yours,

Michael S. Smith
469 Covey Lane
Eugene, OR 97401
14 December 2020

To the Bureau of Land Management,

My name is Neila McGinley, though I go by Mycheal. As someone who has grown up appreciating the beauty of all nature, the possible sale of the Arctic National Wildlife Refuge's coastal plain has caused me great concern. After all, this is land that has been untouched by humans and is rich in natural life. Whether by dependence on the natural resources or through spiritual connection, the flora and fauna as well as the Gwich'in peoples who live here rely on the land in great ways and the leasing of this land will give rise to a myriad of issues.

The land on the Coastal Plain is sacred to the Indigenous peoples that live there. The land is hallowed to the Gwich'in, being the "Sacred Place Where Life Begins." By selling this land, the rights, beliefs, and safety of these humans will be cast aside for greed and money. The Gwich'in deserve the same courtesy and appreciation as any human, so respecting this land is imperative. Not only does this land have a spiritual importance, but there are so many creatures that depend on the Coastal Plain. Millions of birds from across the whole world use this area during migration to get food. If this land is sold, millions of migratory birds, as well as polar bears, caribou, and other species who live on the land, will be in grave danger. Because of the ignorance in selling the Coastal Plains, pollution and habitat loss would threaten the safety, and possible existence, of these beautiful creatures.

Another topic of importance is pollution. Climate change is already a massive issue, and oil and gas leasing on this land would have severe impacts on the climate. Global warming would simply become a bigger problem because of decisions like this. By giving this land up to harvest nonrenewable energy sources, the beauty of nature will be sacrificed, and the health of all living creatures will be put in even more jeopardy than they already are. Not only that, but the whole purpose of the Arctic National Wildlife Refuge was to secure the safety of the wildlife and habitats in that area. The water quality would diminish if this land is sold, causing animals such as fish, to die off. If the whole point of this refuge was conservation, how is it logical to sell the land to people who will do the exact opposite of that?

It is crucial that this land continues to remain untouched. So many living, breathing things, including humans, rely on the Coastal Plain. If this land is sold, we only dig ourselves into a deeper hole, being forced to fight climate change, habitat loss, and scores of other troubles. Looking back, we would know that these could have been slowed, even prevented, if we simply chose to help nature. My great-grandfather was Ernest R. Bartley. He helped write the Alaskan constitution, ensuring that natural land be protected and preserved. Do not selfishly give up the Arctic National Wildlife Refuge coastal plain for oil and gas leasing. The least we can do to save the wilderness is defend the natural places that still carry the beauty of the wild, because when push comes to shove, our safety will always be intertwined with that of nature.

With Gratitude,

Neila "Mycheal" McGinley

Jessica Mullery

321-729-2729

Jcmullery@gmail.com

3513 Kensington Ave Apt 5

Richmond, VA 23221

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.

Additionally, 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.

Do not open these lands for potential oil or gas leases.

Please do not allow the sale and exploitation of these sacred lands to proceed. 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.

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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. "

Signed

Rebecca Ritter

St Charles Missouri 63303

Greetings,

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.

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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 damaging exploitation not only of natural resources but of indigenous people for the sake of lining the pockets of the rich is a disgusting but unfortunately long-standing American tradition--one that I urge you to resist for all our sakes.

Many thanks,

~Amy Reynolds

I am writing to voice my objection to the leasing of lands in the Arctic National Wildlife Refuge to oil and gas companies because of the deleterious effects this will have on the environment and the disregard for the human rights of the Gwich'in people, who have lived on these lands for generations and depend on the resources there for their life and livelihood. The impacts of drilling in the Coastal Plain would be irreversible. Many beings' ways of life are at stake here. The Arctic Refuge is not only home to the Porcupine Caribou Herd upon which the Gwich'in people depend, but to musk oxen, wolves, polar bears, and nearly 200 species of migratory birds that eat, molt, and nest in the Refuge en route to and from six continents and all 50 states. According to NOAA's most recent annual review of the Arctic environment, Arctic warming is over twice the global average for the past 20 years. Not only is the ice pack affected -- the report touches on all land and water north of 66 degree latitude. It is crucial to the environment and to the native people that actions are taken to reduce our carbon footprint, not exacerbate it. We have a moral obligation to protect this landscape for future generations to experience, enjoy, and rely upon.

Respectfully,

Cara Lucille Garofalo, OSF

Cara Lucille Garofalo, OSF

502 S. 6th Street

Reading, PA 19602

(484)-706-3570

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.

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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 woman of Cherokee heritage, I understand deeply just how much of an assault this action will have on our beloved earth. Nature gives us other means of gathering energy which we must explore. We must stop extracting oil and gas that continues polluting the land and instead use the air and sun for satisfying our never-ending hunger for energy.

Thank you, friends!

Diana Mayfield

Cecilia Sosnowski
3512 Ridgewood Ct
Concord, CA 94518
734-812-9168 (m)
cecosonow@yahoo.com

December 14, 2020

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

Re: call for nominations and comments on the lease tracts considered for the upcoming Coastal Plain (CP)
Oil and Gas Lease Sale, document # 2020-25316

To Whom it May Concern;

I am writing to oppose oil and gas leasing on all tracts on the Coastal Plain (CP). There are numerous reasons why these lands should not be opened up to oil and gas leasing, but most concerning to me are the environmental effects this leasing would have on the immediate area and globally.

The risks of oil spills are high. According to Center for American Progress, oil fields on the North Slope have averaged more than 400 oil spills per year, and across Alaska, there were 16 major spills from 2002 to 2016 that released at least 10,000 gallons of oil into the environment. Five of those spills released more than 100,000 gallons of oil. The nearby BP well in Prudhoe Bay gushed oil and gas for three days in April 2017 before it could be contained. We cannot take these risks on the Coastal Plain.

Additionally, the BLM significantly underestimates carbon emissions that would result from drilling the Arctic Refuge, estimating only 56,739 to 378,261 metric tons of annual direct GHG emissions from extraction, transport, etc., and 0.7 to 5 million metric tons of annual indirect GHG emissions from combustion and downstream use of the oil. This is a very misleading set of numbers and is calculated only from the increase from oil demand that the analysis predicts will result from developing the Refuge. It does not account for burning the oil they project will be extracted. That number is much larger. It is

estimated that annual emissions will be equivalent to 16 coal fired power plant, or roughly 62 million tons.

In summary, expanding oil and gas development in the CP 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 impacts of drilling in the Coastal Plain will be irreversible and will have terrible effects on the land. The BLM cannot allow any leasing of this land for oil and gas drilling.

Sincerely,

Cecilia Sosnowski

The human rights and health rights of Arctic Indigenous peoples are now at stake, due to the greed and misuse of power of the U.S. government., Among other things, there has been insufficient Environmental Impact Statements in the planning phase, climate impacts, and impacts on caribou, polar bears, and migratory birds.

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. This is their land and nobody has the right to take it to use for their own greed ridden interests. 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. Especially during this climate emergency, further exploration anywhere greatly endangers all life on our planet.

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.

while we claim that the U.S. is a democracy, the majority of our citizens do NOT want this to happen! Going against the will of the people, only proves how little democracy exists in this country.

Sincerely,

Miriam Kurland

mimbck@yahoo.com

566 East St. Goshen, MA 01032

To the United States Bureau of Land Management,

The Department of Interior has issued a call for public comment on potential oil and gas leases which BLM has delineated across the Arctic National Wildlife Refuge's coastal plain. I fervently urge you to not grant these leases.

The Arctic Refuge coastal plain is one of the last remaining pristine areas in the Alaskan Arctic. This vast, ecologically rich expanse is the birthing grounds of the Porcupine caribou herd, critical habitat for polar bears and migratory birds, and "The Sacred place Where Life Begins" for the Gwich'in Nation.

Humans are finally awakening to the existential threat of global warming brought about largely by our use of fossil fuels. Demand for fossil fuels is diminishing because of this growing awareness--fossil fuels are on their way to becoming obsolete. It's time to turn our attention to providing our energy needs through clean, sustainable sources.

Please protect the United States' natural resources and the global environment by refusing the Department of Interior permission to extract oil and gas from the Arctic National Wildlife Refuge's coastal plain.

Sincerely,

Margaret Emerson

Arcata CA

Rebecca Smith

3512 Ridgewood Ct

Concord, CA 94518

323-710-5671 (m)

wreccabeck@gmail.com

December 14, 2020

State Director, Bureau of Land Management

Alaska State Office

222 West 7th Avenue

Mailstop 13

Anchorage, AK 99513-7504

Re: call for nominations and comments on the lease tracts considered for the upcoming Coastal Plain (CP) Oil and Gas Lease Sale, document # 2020-25316

To Whom it May Concern,

I am writing to oppose oil and gas leasing on all tracts on the Coastal Plain (CP). There are numerous reasons why these lands should not be opened up to oil and gas leasing; I am particularly concerned with the fiscal foolishness that this sale of leases would bring, at great environmental cost.

Under Donald Trump's banner of so-called energy dominance, this latest push to sell out the Arctic Refuge to the oil industry is morally bankrupt, overwhelmingly unpopular, and fiscally dishonest. A Center for American Progress analysis finds that offering oil and gas leases in the Arctic National Wildlife Refuge is likely to yield no more than \$37.5 million in revenue for the U.S. Treasury over the next 10 years—far short of the \$1 billion to \$1.8 billion that drilling proponents claim could be raised. Because the area is so remote and there is no existing oil infrastructure in the Arctic Refuge, no oil production is likely to occur within 10 years. Even under the overly optimistic fiscal estimates of drilling proponents, revenues from oil extraction in the Arctic would offset less than 1 percent of the increased deficit in the tax bill.

In addition, Arctic oil is not wanted. The Congressional Budget Office has pointed out that at current low oil prices, drilling in the Arctic Refuge is not an effective strategy for increasing revenues. The availability and accessibility of these resources makes it even more unlikely that oil companies will want to gamble on drilling the Arctic Refuge.

The coastal plain where drilling would occur is considered the “biological heart” of the Arctic Refuge. The infrastructure, rigs, pipelines, roads, and machinery required in industrial-scale drilling operations

would put the 37 species of land mammals, eight marine mammals, 42 fish species, and more than 200 migratory bird species within the Refuge at extreme risk of habitat destruction.

In summary, the BLM must NOT lease a single square inch of the Coastal Plain. To do so would be foolish and at a huge cost to the wildlife in the CP. We cannot allow this pristine area to be damaged by oil and gas drilling. The BLM must NOT lease the Coastal Plain.

Sincerely,

Rebecca Smith

Bureau of Land Management:

I strongly oppose leasing ALL tracts on the Arctic National Wildlife Refuge's coastal plain.

My primary reason for strongly opposing the leasing is because 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.

I also strongly oppose the leasing is because 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.

Sincerely,

Art Hanson

1815 Briarwood Dr.

Lansing, MI 48917

517-420-4314

ahanson47@comcast.net

Expanding oil and gas development in the Arctic will further exacerbate climate adaptation and mitigation challenges in an Arctic that is already warming at twice the rate of the rest of the country. The BLM is significantly underestimating the carbon emissions that would result from drilling in the Arctic because their calculations are not accounting for burning all of the oil they project will be extracted. They are downplaying the unacceptable climate impacts of extraction in the Arctic.

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

Thank you!

Ashleigh Sall

303-246-8125

ashleigh.j.sall@gmail.com

Address:

2899 N Speer Blvd #405

Denver, CO 80211

December 12, 2020

To: State Director
BLM
Alaska State Office
222 W 7th Ave
Mailstop 13
Anchorage AK 99513-7504

Re: Arctic Refuge Public Comment

Human activity such as exploration for oil and drilling should not take place in this very fragile ecosystem. This only exacerbates global warming, which is causing the Arctic ice to melt at an alarming rate. Birds, polar bears, and caribou will be adversely affected by this activity. The world must move away from fossil fuels.

Please don't go forward with this ill-conceived plan.

Thank you,

Anne Olden
6101 N Portsmouth Ave
Boise ID 83714
208-853-1066

Carrie Smith
3512 Ridgewood Ct
Concord, CA 94518
323-868-7132 (m)
heycarriann@gmail.com

December 14, 2020

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

Re: call for nominations and comments on the lease tracts considered for the upcoming Coastal Plain (CP) Oil and Gas Lease Sale, document # 2020-25316

To Whom it May Concern,

I am writing to oppose oil and gas leasing on all tracts on the Coastal Plain (CP). There are numerous reasons why these lands should not be opened up to oil and gas leasing; I am specifically concerned about the effect oil and gas drilling will have on the Gwich'in people, who have relied on and protected this area for tens of thousands of years.

The Gwich'in of Alaska and Canada are culturally and spiritually connected to the Porcupine Caribou Herd (PCH), which in turn relies on the CP for a calving and post-calving habitat. The Gwich'in consider the CP sacred; it is the place where life begins. They have depended on the caribou and the land for food, clothing, and their subsistence way of life for thousands of years. The Gwich'in have respected this land, caring for its clean air, clean water, and abundant wildlife. It is vital to their human rights and food security.

The BLM's own analysis confirms that a significant percent of Gwich'in subsistence comes from the PCH, and it agrees that oil and gas leasing will affect the PCH. Yet the BLM denies that leasing will affect the Gwich'in's subsistence, defying logic. If the CP is opened up to oil and gas drilling, it will be done with the knowledge and understanding that the PCH will be diminished, and that the Gwich'in will suffer and struggle to survive. This scenario echoes the 19th century westward expansion across the great plains

of the lower United States, when millions of buffalo were purposefully slaughtered to deprive the indigenous people of their main food source. It was a solution to the "Indian Problem," a phrase coined by President Grant to acknowledge that the indigenous people of the plains stood in the way of Manifest Destiny and profit from the land. Simply put, this settler colonialism was genocide. Destruction of the PCH will have the same results.

In summary, drilling for oil and gas in the CP will destroy the Porcupine Caribou Herd, which in turn will have drastic and irreversible effects on the indigenous people of the area—the people who have protected this beautiful land for tens of thousands of years. We must NOT allow drilling on this land. The BLM must NOT lease the Coastal Plain.

Sincerely,

Carrie Smith