

December 16, 2020

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Development of oil and gas leases within the 1002 area of the Arctic National Wildlife Refuge (ANWR) presents a number of logistical and environmental problems beyond the negative social and regulatory issues which I believe will have been thoroughly covered by other commenters. Because of a rushed expedited lease sale process, there has not been a thorough assessment of available water resources on the coastal plain area affected by this lease sale. Both Federal and State agencies, as well as the oil and gas industry, seem to be operating under the assumption that this area will provide similar conditions to the coastal plain area around Prudhoe Bay and fields further to the west, including within the National Petroleum Reserve – Alaska (NPR-A), but in my professional opinion this could not be further from the truth. These areas have distinctly different hydrologic systems operating in distinctly different terrains, and plans and assumptions relating to the development of fields currently in operation will not apply to new leases within ANWR. My comment seeks to explore some of these differences and provide context for why they are important.

Among the most striking differences between the coastal plain area contained within ANWR and the coastal plain in areas further to the west is the density of lakes. While in areas of NPR-A, lake density approaches 20% of total land area (Sellmann et al., 1975; Hinkel et al., 2005, Arp & Jones, 2009), within the 1002 area this only approaches 1.5% (Figure 1). Within the context of oil and gas development, these lakes play an important role as water sources for construction of ice roads and pads. Without the density of lakes seen on the western coastal plain, construction of ice roads and pads without the disruption of fish and migratory habitat will become a tremendous task and is not accounted for in any of the planning documents (Alerstam et al, 2001). Fish habitat can only be maintained where there is enough water for fish to survive under up to 2m of ice during some winters; this means that lakes must maintain sufficient water levels to provide this habitat, even when drawing water for industrial operations. Without an

adequate assessment of water resources available, this task represents a gap in knowledge and understanding of this region, and may prove to be impossible to overcome.

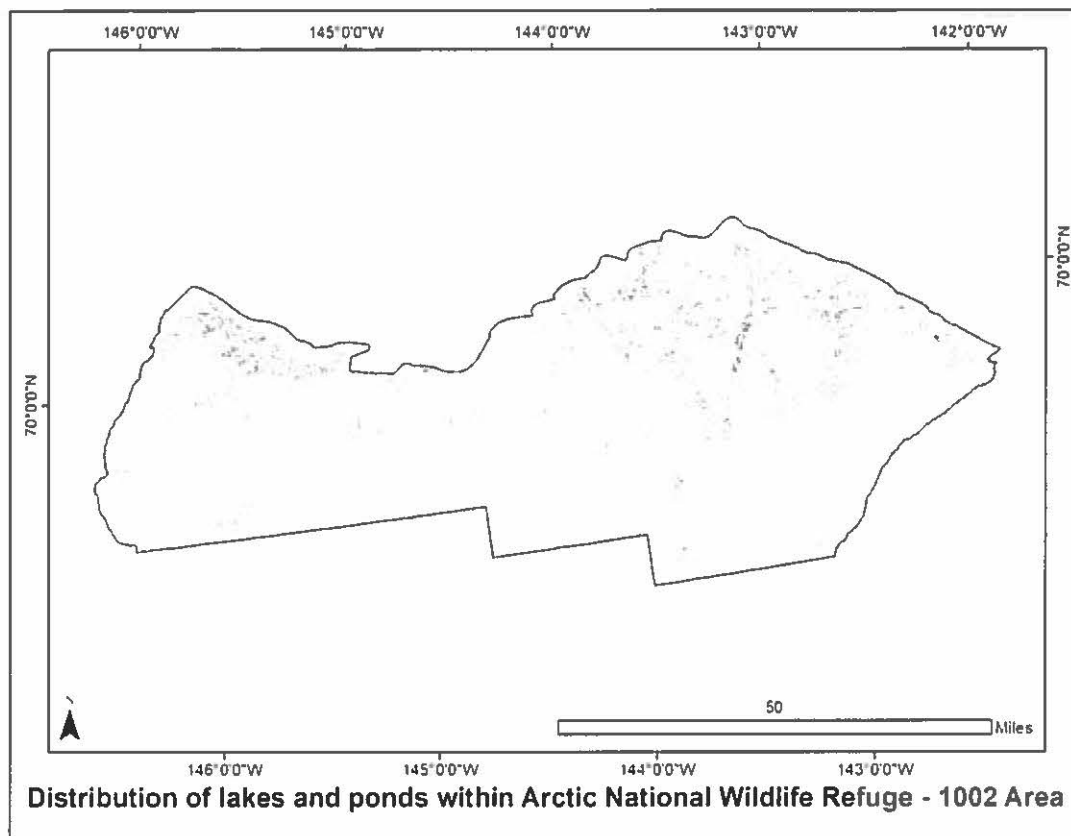


Figure 1: Distribution of lakes and ponds within Arctic National Wildlife Refuge - 1002 Area. Water body information taken from National Hydrographic Database.

In addition to the different character of the lakes within the region, the rivers are also of totally different character than further to the west. With the proposed lease area encompassing areas of 11 major drainages, this should be a major planning obstacle, but one that has not been thoroughly considered in planning documents. Most of these drainages have never been gauged or surveyed for annual flow, and those that were in the past have ceased observation. Only the Hulahula river near Kaktovik is currently monitored. Rivers represent unique obstacle for infrastructure development on the arctic coastal plain. Peak snowmelt floods have the ability to easily inundate and damage infrastructure in the vicinity of the river channel, and the timing and magnitude of these events is highly dependent upon local weather patterns and hard to predict. Further, recent changes within Alaska has seen additional flood peaks in August and September due to precipitation pattern changes (Arp et al., 2020). These fall floods have a higher potential for damage and river channel migration because the ground has nearly reached its annual maximum thaw depth, making it more susceptible to erosion. This represents significant risk to infrastructure development in these areas, including pipeline and ice road crossings.

Aufeis accumulation represents a distinct hazard within these riverine systems, one that is separate from flood events but also has the ability to exacerbate them, as seen on the catastrophic Sagavanirktok River flood near Prudhoe Bay in 2015 (Toniolo et al., 2017). There has been speculation that the compression of snow through seismic operations and construction of snow and ice roads has the ability to trigger or increase aufeis formation through increased ice thickness beneath the compressed snow acting like a dam and forcing water to the surface. These aufeis fields have the potential to disrupt infrastructure related to oil and gas development and are difficult to predict. Without thorough investigation of the satellite record and analysis of potential impacts of compressed snow on the formation of new or expanded aufeis fields, they become impossible to predict with any degree of certainty.

Fish habitat is also a crucial component of the hydrologic system within the Arctic National Wildlife Refuge. Dolly Varden (*Salvelinus Malma*) are an anadromous species with significant runs in watersheds within the area of proposed lease sale. While serving an important subsistence role to the community of Kaktovik, waters home to anadromous species also receive special protections under NEPA and have not been adequately accounted for in planning documents for development of proposed leases. Further, ANILCA gives these waters and habitat

additional considerations and protections which are not accounted for here. Without a thorough assessment of fish habitat within the proposed lease area, the conditions imposed by both of these pieces of legislation are not being met.

As a professional hydrologist operating on Alaska's North Slope, I speak to my area of expertise; that being water resources within the area of proposed leases within the Arctic National Wildlife Refuge. The science surrounding water resources is clearly lacking as it pertains to potential development, so my opinion must be to oppose any and all lease sales.

Sincerely,

Allen Bondurant

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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.pcmb.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,

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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
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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,



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State Director
Bureau of Land Management Alaska State Office
222 West 7th Ave. Mailstop 13
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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,

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21 November 2020

State Director, Bureau of Land Management
Alaska State Office
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To Whom It May Concern:

I am writing to comment on the Coastal Plain Alaska Oil and Gas Lease Sale announced by the Bureau of Land Management on 17 November 2020. My comments concern several related issues that have not been adequately addressed by BLM from the very beginning of its work on opening the Arctic Refuge to oil and gas development. These issues are treated here not in order of importance, because they are so closely related to one another. The deleterious effects of oil and gas development on one aspect will also be seen in other aspects.

I would like to note that I have lived in Fairbanks, Alaska, from 2013 to 2020. During 2020, I have been a resident of New Mexico, but I will be returning to live and work in Alaska in early 2021. I have traveled to the Arctic Refuge and have visited Prudhoe Bay. I have driven the Dalton Highway many times, in summer and winter. My concern for the Arctic Refuge has led me to comment publicly many times, in person and in writing, over the past 4 years. I have read an immense amount of material on the Refuge, the Coastal Plain, and the BLM plans for developing the area for oil and gas extraction on industrial scale. While my comments attempt to be specific, they also intend to be on that industrial scale.

Wildlife

It is clear from the maps made available with the final EIS published by BLM on this project that the entire coastal plain is being opened for lease sale and therefore being opened for industrial development. The grid map for the lease sale covers the entire coastal plain. This opening of the entire coastal plain is counter to the EIS statement that the least impact on the area 1002 would be to lease 800,000 acres, the minimum required by the Tax Bill of 2017. That lease sale would

meet the mandate of the Tax Bill of 2017. While it would not be as good as the Alternative A, to make no development at all, it would be much less than the alternative summarily dictated by BLM in its final record of decision. As a mere preamble, it is at least necessary to note the disregard shown by the BLM for the many public and scientific comments made during these past four years.

The wildlife populations most affected by this project will be polar bears, the Porcupine caribou herd, salmon and Arctic cod, and migratory birds (snow geese are the species most specifically treated in the EIS). From my reading of official documents and supporting documents for the EIS, it seems that ringed seal populations may well be affected as well.

It is clear that a significant population of denning polar bears lies within the project area and would be adversely affected by the industrial infrastructure of roads, pipelines, camps, and drilling pads. The work of locating these denning bears is always changing, an ongoing project that differs year to year. How can the development of an industrial grid of infrastructure (roads, pads, camps, bridges, abutments) keep from altering the denning patterns of polar bears? The clear answer is that it cannot help but alter the denning patterns and therefore cause harm to a fragile population of polar bears on the Coastal Plain. The mitigations are in the planning, but there is absolutely no certainty that these planned mitigations will keep the fragile polar bear populations from harm. The planning documents for seismic testing, for instance, clearly point to “accidental take” of polar bears, as if this is an answer to the concern for killing this species.

The Porcupine caribou herd has historically used nearly all the central part of the Coastal Plain as its spring calving grounds and as migratory paths after calving. This is shown clearly by the maps for 1982-2002 provided by BLM with its final EIS. The patterns of calving are not fixed, but they show clearly that the project area is used by the Porcupine caribou herd repeatedly, year to year, and should remain open for the herd to use always. An installation of industrial oil and gas exploration and extraction—gravel roads, heavy machinery, man camps, and oil/gas drilling pads, along with all the activity related to heavy trucks, hauling supplies, moving equipment and personnel—will certainly interrupt and alter the free patterns of the caribou in their spring migration and calving, as well as their post-calving movements. This applies to virtually all the

tracts in the BLM lease map. It may be that the four tracts on the far western edge of the project area (#s 17, 27, 31, and 32) would be less likely to be involved in calving by the Porcupine herd, but even that statement is conjectural. The fact is that the EIS maps for 1982-2002 suggest that the entire project area is historically used by the herd for calving and post-calving movement. Imagine if corporations are developing different tracts in different parts of the project area: it is a real possibility that uncoordinated development would (inadvertently) squeeze the Porcupine caribou herd out of its historical calving grounds altogether by making their migration routes impossible to follow. We know that development affects caribou migration routes. Development on the scale of the proposal will affect these migration routes forever.

The maps for salmon and Arctic cod populations indicate that the Staines and Canning Rivers are essential habitat for salmon populations and that the entire coast of the Beaufort Sea touching the proposed project area is essential habitat for Arctic cod. Why would anyone think that it could be responsible to lease, explore, and extract oil and gas on industrial scale in these critical habitat areas?

As the map for snow geese flocks suggests, the entire Coastal Plain is a vital nesting and feeding ground for migratory waterfowl and for other migratory bird populations. How would industrial development change the migrations and nesting of millions of birds? There is no evidence to suggest that this is somehow not a matter of great concern. Like the other wildlife populations here, BLM is simply accepting that there will be adverse effects on migratory bird populations. How bad? Nobody really knows. In the final EIS and Record of Decision, BLM chooses to ignore these concerns.

Water

The Coastal Plain is a vibrant and resilient network of streams, rivers, wetlands, ponds, and lakes, all of which function together as support for the wildlife populations detailed in my first set of comments, but not limited to those populations. The muskoxen of the Coastal Plain, for instance, are a vital and small, fragile population. They depend absolutely on the hydrology of the Coastal Plain as it stands today. How will the industrial development of the Coastal Plain affect the hydrology of the tundra, the flow of streams and rivers, and the existence of wetlands,

ponds, and lakes in the 1002 Area? All of the science produced in answering this complex set of questions points, without doubt, to the harmful impact of industrial development on the water regime of the Coastal Plain. If we harm the water supply and system, we harm the wildlife. We harm the vegetation of the tundra. We harm the base of willows growing along the streams and rivers. We adversely affect the hosts of plants and animals depending on this whole system.

Is there any scenario in which industrial development has NOT adversely affected hydrology of the ecosystem? What level of impact is acceptable, and who gets to make that determination? In the EIS and ROD documents, BLM takes that decision lightly, without adequate explanation.

Climate Change

Beyond the prospects of severely impacting the habitat of wildlife populations and the hydrology of the ecosystems supporting those populations, the oil and gas lease sales could not come at a worse moment in world history. We know for an absolute fact that climate change is real and that it is linked causally to oil and gas fuel burning. We know that every gallon of gasoline, fuel oil, or natural gas is going to contribute further to the crisis the whole planet is facing. To engage in this lease sale at this moment is utterly irresponsible. It purports to earn billions of dollars for Alaska and for the U.S. Government, but the projections for these dollars of profit in taxes are unreliable and uncertain. There are many studies to show that the projections are grossly exaggerated and unlikely to be realized in the foreseeable future. Meanwhile, it is vital to keep every gallon of oil and gas in the ground. This is a larger matter than the single oil rig or drilling platform in Tract # 5 or Tract #7. But it is clear that the cumulative impact of oil and gas production in the years 2020 to 2050 will cause irreparable harm to the lives of people all over the planet. Nobody will escape these effects, and we are feeling them already in 2020.

Climate change is already a clear problem in Alaska. We have experienced temperature rise to a greater extent and degree than anywhere on the planet. Alaska is Ground Zero for climate change. We see permafrost thawing at an alarming rate; coastal erosion; streambank erosion; drought and wildfire expansion; paradoxically, massive rainfalls and erosion; dislocation of human populations; disruption of plant populations (brushification of tundra habitat) and animal populations. Scientific reports on climate change have entire sections—booklets—on the harmful

impacts seen already in Alaska. We know, without doubt, that business as usual cannot continue. The cumulative effects are too great, and they are happening too quickly to ignore.

It defies common sense and our scientific knowledge to engage in this scale of fossil fuel development at the very moment we are attempting to counteract the direct and cumulative effects of climate change caused by fossil fuels. The US Government, through the lease sale program in the Arctic Refuge, is engaged in the most directly contradictory project seen in modern times. Contradictory of science, since we know that opening the Coastal Plain this way is immensely harmful and will increase the effects of climate change. Contradictory of common sense, since we know that every gallon of oil or gas burned into our atmosphere is adding to the burden we all are feeling already.

In the final EIS and ROD, the BLM presented misleading evidence that did not take into account the cumulative, global effects of climate change in considering the proposed project and now the proposed lease sale.

Human Beings

The most directly and negatively impacted human population by this planned lease sale is the Gwich'in Nation, and the BLM EIS already made this apparent. The other directly impacted human population will be the Inupiat people of the North Slope. (Some Inupiat corporations are in favor of the lease sale, but not all Inupiat people agree with this corporate decision.) In addition, all other human populations in the project area will be negatively impacted by industrialization of the landscape. This means all the workers in Kaktovik, all the fishing industry workers in the Beaufort Sea, and every truck driver and other worker involved in making a living in this North Slope region. Many of them are working in the oil and gas industry already, but the fact remains that on the time scale of a few years and on the time scale of decades and longer, the industrialization of the Coastal Plain will break the relationship between human beings and what the Gwich'in rightly call "The Place Where Life Begins." There cannot be a change in the relationship on this scale without changing the way people, especially Gwich'in and Inupiat people, live in the region and make use of this Coastal Plain and all the life it supports. This concern has been raised by Gwich'in people for over thirty years, and they have

been arguing all these decades that this development is tantamount to cultural genocide. How can BLM ignore the call of the Gwich'in people, the most directly impacted by the lease sale? How can they ignore Inupiat people in order to listen to Inupiat corporations? This is an act of irresponsibility and gross negligence of duty, an act perpetrated from above by the political appointees of the Trump administration. Career wildlife biologists aren't the ones pushing this decision. Gwich'in elders in the villages bordering the Refuge aren't asking for more drilling pads and monster trucks. The people pushing this lease sale are politically motivated and supported by corporate leaders.

On a planetary scale, this project will affect human beings in the United States and over the entire world. The arguments given by BLM and the corporations is that only a tiny percentage of the land is being developed, and only a tiny percentage of fossil fuels is being extracted. The BLM documents discuss how to contain a fuel spill at a drilling pad, as if this somehow answers the concern for human health on the long term. This kind of rhetoric is misleading and false, and it could be called meretricious. Every single gallon counts. Every single drop burned into the atmosphere counts. The effects are not limited to a single drilling pad or a single man camp and its fuel consumption, or how the workers handle their garbage. The real point is that cumulative effects add up inexorably and can have consequences far beyond what the planners imagine. The cumulative effects of industrial development on the scale proposed for the Coastal Plain are immensely harmful to the human populations in the region, in the state, in our country, and over the whole planet.

Conclusion

From the perspective of the Big Oil corporations, the Trump administration, and the political appointees in the Interior Department and the Bureau of Land Management, and from the perspective of Alaska politicians like Don Young, Lisa Murkowski, and Dan Sullivan, or our current Governor Mike Dunleavy, this lease sale is long overdue. From their perspective, they have been hoping to open the Arctic Refuge for decades, and this is the closest they have come to what they consider a great success. They have convinced a slim majority of Alaskans that this lease sale is in their best interest. After all, who wants to pay income tax?

But this idea of success and “best interest” is misleading and false. The movement of energy production in the USA and in the world is away from oil and gas. We do not *need* oil and gas lease sales in the Arctic Refuge. The sales will not benefit the local people, the state of Alaska, or the so-called “energy independence” of the United States. The power structure of Big Oil and its political partners is seeking this fast-tracked lease sale because these people know that their time is coming to an end in January 2021. The reality is that politics and corporate money are driving this process, as they have done since the beginning of the push in 2017.

Every political reality in Alaska over the past decade has shown us that the lease sale is nothing but a temporary response to the structural problems in funding state government. The tax base in the state is limited and narrow. Relying on BLM and Big Oil to solve the state’s financial problems is an evasion of responsibility by our political leaders on the state and national levels.

I end with a direct appeal to you, Mr. Chad Padgett, State Director for the BLM. I have read your biography on the BLM website, and it is no secret that you were until recently on the staff of Representative Don Young. Is it possible for you to see that the interests of Alaska are not only for oil and gas development? Is it possible for you to think toward the future of the state, when oil and gas are no longer the prime movers of the economy and the tax base for the state government? Can you see that Representative Young is always in favor of industrial-scale development, and that his vision of such development is an old-school view of Alaska, no longer suitable for the twenty-first century? Can you see that in the waning days of this Trump administration, it is in fact practical and realistic to abandon industrial developments like Pebble Mine and drilling in the Refuge? The currents are flowing away from these projects. I hope you will find a way to see that clearly.

James P. Warren

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December 7, 2020

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

Subject: Comment on *Coastal Plain Alaska Oil and Gas Lease Sale* (re: Federal Register Document No. 2020-25316)

Dear Director Padgett,

I am writing to provide comments regarding the prioritization of tracts within the Arctic National Wildlife Refuge (hereafter the Refuge). My comments derive from the goal to minimize impacts to the fish and wildlife for which this landscape is a refuge, as well as the Indigenous Peoples who rely on these fish and wildlife for subsistence. Specifically, I request that the BLM not lease

- Tracts # 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, and 32 due to the high likelihood of interfering with polar bear reproduction and neonate survival.
- Tracts # 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, and 32 due to the high likelihood of interfering with caribou reproduction and neonate survival.
- Tracts # 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, and 32 due to the high likelihood of interfering with migratory bird reproduction and juvenile survival. This includes millions of birds from hundreds of different species that migrate seasonally to the Refuge from every continent.
- Tracts # 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, and 32 due to the high likelihood of interfering with wolverine reproduction, food acquisition, movement, and survival. The Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement (EIS) fails to include numerous published studies that robustly demonstrate the negative impacts that leasing activities will have on wolverines within the Refuge. This omission has critical implications for both the ecological dynamics of the Refuge as well as the socio-economic dynamics, since wolverines are an important subsistence resource for Indigenous Arctic communities (Cardinal 2004), including within the Arctic National Wildlife Refuge. Although these impacts should be included in the EIS, they bear directly on the prioritization of leasing tracts and I therefore outline them here.

Wolverine distribution and occupancy: All tracts that are currently being considered for leasing likely fall within the territories of resident wolverines, a conclusion based on the species' known habitat associations within the nearby National Petroleum Reserve – Alaska (Poley et al. 2018). Moreover, all tracts except #27, 31, and 29 are reported to be important subsistence areas for wolverines by the residents of Kaktovik and Nuiqsut (EIS Maps 3-46 and 3-57). Therefore, the following impacts, which are not included in the EIS, apply to all tracts.

Wolverine reproduction: Leasing in all tracts will likely impact wolverine reproduction. On the Alaskan tundra, female wolverines give birth and rear kits in dens excavated in snowdrifts between late February and early May (Magoun 1985; Magoun and Copeland

1998), so these energetically-depleted mothers and their altricial young are highly susceptible to disturbance by seismic exploration and other over-snow activities during this period. Wolverine population density on Alaskan tundra is estimated to be approximately 20 individuals·1000 km⁻² (Magoun 1985). This fact, combined with the dense grid of over-snow travel planned by seismic vehicles, creates a high potential for denning interference by oil and gas activity, including the high likelihood that some neonate wolverines will be crushed by oil and gas vehicles. None of the above studies are cited or referenced in the EIS.

Wolverine movement, dispersal, and food acquisition: Leasing any tract will negatively impact wolverine movement, habitat selection, and dispersal due to the species' response to roads and human activity. Wolverines respond to roads by both increasing their movement rates and avoiding the area (Scrafford et al. 2018), and dispersing female wolverines are impeded by roads, thereby reducing gene flow (Sawaya et al. 2019). Additionally, wolverines on Alaska's North Slope have been documented hunting caribou during continuous pursuits of up to 62 km, highlighting the species' need for intact, unfragmented landscapes (e.g., by roads; Magoun et al. 2018). Since wolverines in Arctic Alaska rely heavily on caribou for food (Dalerum et al. 2009; Dorendorf et al. 2018), the multitude of impacts to caribou, including roads, would negatively impact wolverines as well. None of the above studies are cited or referenced in the EIS.

Summary: Collectively, these studies highlight the many ways that leasing any tract of the Arctic National Wildlife Refuge Coastal Plain will negatively impact wolverines, none of which is considered in the EIS. These considerable impacts to a top carnivore in the Arctic ecosystem demand formal inclusion in the review process, and highlight the need for a more scientifically robust evaluation of the ecosystem impacts that this lease sale may have.

Given these considerations, I request that the BLM devote special attention and further analysis to wolverine impacts in all tracts and that the BLM not lease any tract due to negative wildlife and human impacts.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Glass", with a stylized, cursive script.

Tom Glass

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(Continued next page)

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Douglas J. Frugé
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December 15, 2020

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

Dear Mr Padgett:

This letter presents my comments responding to the Call for Nominations and Comments for the Arctic National Wildlife Refuge (Arctic Refuge) Coastal Plain Alaska Oil and Gas Lease Sale. I am a retired US Fish and Wildlife Service (FWS) employee. During August 1982 to January 1984 I served as Oil, Gas and Minerals Coordinator for the National Wildlife Refuge System in Alaska, playing a major role in finalizing the Environmental Impact Statement (EIS) for and developing the oil and gas exploration program for the Coastal Plain that was conducted in accordance with Section 1002 of the Alaska National Interest Lands Conservation Act (ANILCA). From January 1984 until June 1987 I served as Deputy Refuge Manager for the Refuge, and in that role oversaw the refuge's program for monitoring all aspects of oil and gas exploration on the refuge's coastal plain. During the first year of seismic exploration I spent a considerable portion of the winter on-site interfacing with seismic exploration personnel and directly supervising the FWS field monitors.

As a general statement, I do not believe an oil and gas exploration or production program on the Coastal Plain would be in the best interests of the Arctic Refuge, Alaska, our nation or the world, and I would oppose leasing of any and all tracts being offered. I would further support the Coastal Plain being designated wilderness under the Wilderness Act of 1964 as recommended in the Arctic Refuge Comprehensive Conservation Plan (CCP).

Although an oil and gas leasing program was authorized for the Coastal Plain by the Tax Cuts and Jobs Act of 2017, Public Law (PL) 115-97 on December 22, 2017, a decision to move forward with a leasing, exploration or production program must consider and be compatible with the Arctic Refuge purposes as set forth in Section 303(B)(2) of the ANILCA, as amended, and modified by Section 20001 of PL 115-97. The Arctic National Wildlife Range was established in 1960 by Public Land Order 2214 "For the purpose of preserving unique wildlife, wilderness and recreational values . . ." In 1980, the ANILCA re-designated the original range as part of the larger Arctic Refuge, and designated much of the original range as wilderness under the 1964 Wilderness Act. It provided four purposes that guide management of the refuge: (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 US; (iii) to provide the opportunity for continued subsistence uses by local residents; and (iv) to ensure water quality and necessary water quantity in the refuge. Section 20001 of PL 115-97 Act added a fifth purpose: (v) to provide for an oil and gas program on the Coastal Plain. I do not believe this fifth purpose is compatible with the original four.

Some of my concerns are based on what I saw as inadequacies in the Coastal Plain Oil and Gas Leasing Program EIS. An example of this was the lack of a comprehensive table or summary of environmental impacts that would result from the three action alternatives in the EIS, given the many environmental factors that needed to be evaluated in order for reviewers and decision makers to make sense of the voluminous and extremely complex information presented in the Leasing EIS documents.

Another example of a concern with the EIS was the Bureau of Land Management's (BLM) interpretation of the 2,000 surface-acre disturbance limit specified by the US Congress in PL 115-97 as only those areas to be covered by production and support facilities. I believe this interpretation was too restrictive since any and all types of surface disturbance and structures can potentially affect the environment --- not just those directly associated with oil and gas production and distribution facilities. In addition, there are potential effects from some types of structures that may not actually be in direct contact with the ground surface (e.g., elevated portions of pipelines) and therefore not subject to the 2,000 surface acre limitation. It was also not clear whether the BLM evaluated the impacts of all disturbances or only those included in its interpretation of the 2,000 surface acre limitation. If the BLM did not consider the effects of all potential structures or facilities, the actual levels of environmental impacts were underestimated.

I think the EIS underestimated Coastal Plain's oil and gas maximum contribution to global greenhouse gases (GHGs). However, even if the estimated contribution of 0.01% is correct, it would still nevertheless be substantively contributing to GHG concentrations during a time when we need to be very aggressively reducing all GHGs as soon as possible in order to avoid the worst effects of climate change by the end of the century.

I believe there would be cumulative effects on air quality from existing sources of air pollutants in combination with additional sources resulting from oil and gas development. Given the very good existing air quality in the coastal plain, I believe that noticeable cumulative air quality impacts would occur with an oil and gas production program in the area.

Effects on the acoustic environment would also be noticeable and significant. There would be negative impacts on wildlife and wildlife-associated recreation and perhaps on subsistence hunting on the Coastal Plain as well as the wider refuge area.

Topography of the program area would be affected in many areas, depending on the extent of activities, and geomorphological features, such as water bodies and permafrost features would be re-shaped. Effects of climate change on the permafrost would likely exacerbate these impacts.

Water is one of the most important resources needed for development and production of oil and gas. Impacts on water would likely include shoreline and surface disturbances resulting from thawing permafrost, changes to natural drainage patterns, increased height and velocities of floodwater, increased channel scour and bank erosion, and increased sedimentation. Changes in water recharge potential and water quality would also result from water withdrawal and petroleum and chemical spills. Significant reductions in surface water quantity due to increased demand for water needed for drilling activities would also occur.

Water availability on the coastal plain also tends to be significantly lower than in other areas of the North Slope.

Significant amounts of waste materials associated with drilling and exploration activities would be generated on the Coastal Plain, including wastewater, produced fluids, drilling muds, and spills of oil, salt water and hazardous substances, along with various types of solid waste. All of these materials would require some type of disposal or remediation, both of which are very problematic in a remote Arctic environment.

Impacts to vegetation would occur from ice road construction and winter tracked vehicle activities, such as seismic exploration. Impacts would include community structure changes as well as direct physical damage. Slower growth rates for plants in the Arctic result in more persistent damage than in more temperate areas. Dry vegetation habitats would generally be affected more severely than wet habitats. Although some of these impacts would be low intensity and detectable up to only five years after disturbance, some severe damage can persist for at least 25 years, and extremely severe damage could result in permanent vegetation changes in some areas. Proposed 3-D seismic exploration would require quite concentrated grids only hundreds of feet apart and thus would affect a very high proportion of the Coastal Plain. Construction of permanent structures would result in permanent loss or changes to vegetation communities in those areas.

Fish populations and habitats would be most affected by water withdrawal for ice road construction, water supply, dust suppression and other uses. These activities would reduce habitat quantity and quality for overwintering fish as well as reduced accessibility to and/or quality of summer habitats. Removal or compaction of snow on lakes or stream overwintering areas would also increase the depth of freezing in those areas, thus also reducing critical overwintering habitat. There are few lakes in the Coastal Plain, limiting the available unfrozen water for oil and gas operations. Water withdrawal from the few available lakes would affect habitats that are already in short supply for some fish species. Fish and other aquatic species would also be directly affected by construction and operation of gravel roads, gravel pads, airstrips, pipelines, culverts, bridges, barge landings or docks, and gravel mining. Dust and gravel spray would increase, increasing turbidity in some water bodies resulting in long-term decreases in aquatic habitat quality in some areas. Ice roads, snow management, seismic surveys, maintenance, and bridge piers or piles may alter flow patterns and affect fish passage. Persistent fish passage obstruction could affect survival and/or growth for some species. Noise from various aspects of oil and gas development would also increase stress, injury to or death of some fish. Contaminants in produced water, brine or from chemical or petroleum spills would be other sources of potential impacts to fish and fish habitats.

Birds and bird habitats on the Coastal Plain would be impacted by winter ice roads and pads, water withdrawals, gravel mining, gravel pads and roads, dust and gravel spray. Disturbance and displacement would also occur through construction, ground and air traffic, noise, as well as human presence and activity. Disturbances of various types can lead to behavioral changes, interference with resting and feeding activities, increased energetic costs, effects on reproduction success and displacement from preferred habitats. Activities and structures such as vehicle and aircraft movements and tall structures, including communication towers and drill rigs, and chemical, oil or other contaminant spills would result in injury and mortality. Human food and resulting garbage due to increased human presence and activities would result in attraction of predators and scavengers, which would cause altered behavior

patterns and increased mortality for some birds due to predation. In general, activities during winter would affect fewer species and numbers, while activities during summer would affect many species in high numbers, possibly leading to population-level impacts for some species.

Terrestrial mammals and their habitats would be affected by a variety of activities. Seismic exploration, particularly 3-D seismic, would eliminate sub-snow habitat for some small mammals, reduce forage availability, and disturb denning bears and muskoxen. Gravel and pipeline construction and drilling operations would result in habitat loss from gravel fill placement, habitat alterations from drifted snow, gravel spray and dust deposition, early snowmelt due to dust deposition, displacement of caribou by infrastructure during calving season, attraction of caribou to roads and gravel pads during fly harassment periods, disturbance and altered behavior due to noise and activities associated with construction, drilling and operation. Other impacts would result from alteration of normal movement patterns and fragmentation of habitat due to roads and pipelines, injury or mortality due to vehicle strikes, contamination of roadside forage due to dust deposition, and injury or mortality of small mammals in subterranean burrows and sub-snow habitats. Ice roads and pads would alter habitats due to drifted snow, delayed ice melt, vegetation compression and hydrologic alterations. Gravel mines and mining would cause direct habitat loss at mine sites, habitat alteration from dust, water displacement, hydrologic alteration at mine sites and displacement from gravel mines due to noise and activity. Of foremost concern regarding impacts to mammals would be potential adverse effects on the Porcupine Caribou Herd (PCH), which uses the Coastal Plain as their primary calving grounds. Infrastructure development in areas of concentrated calving for the PCH could lead to displacement of calving caribou and decreased calf survival or a decline in caribou body condition, which could lead to population-level effects.

Oil and gas drilling would affect several marine mammal species, but impacts on polar bear, a threatened species under the Endangered Species Act (ESA), are particularly problematic. Oil and gas activities would occur over large areas of the designated terrestrial-denning unit of critical habitat for polar bears, including all areas within 20 miles of the coast. Gravel mining, gravel and ice road construction, changes in drainage patterns and off-pad snow disposal would result in direct loss or alteration of maternal denning habitat. Construction of ice roads and pads would also result in temporary loss or alteration of polar bear denning habitat due to disturbance. Other marine mammal species would be affected by dredging or screeding (substrate leveling) operations at barge landing sites on the coast, altering benthic foraging habitats for seals in coastal waters. Ice road and barge traffic, dredging or screeding operations, human activities at camps and other facilities, and oil spill response activities and drills would disturb and affect behavior of polar bears and seals. Barge and large vessel traffic would disturb or displace bowhead whales, seals, and possibly polar bears. Vehicles on roads could strike polar bears, and vessels moving through water could likewise strike marine mammals, resulting in injury or mortality. Accidental chemical spills or contamination could be another source of impacts on marine mammals. Direct human-polar bear interactions could also result in injury or mortality to humans and likely to bears.

Subsistence harvest by residents of the Village of Kaktovik, located within the Coastal Plain, would likely be directly impacted. Bowhead whale harvest by Kaktovik and Nuiqsut residents could be indirectly affected, as could harvests of caribou, waterfowl, and fish. Disturbance from noise, traffic, human activity and oil and gas infrastructure could cause both direct and indirect impacts on subsistence users by affecting availability of animals to users, both within

and outside the Coastal Plain, which could affect cost or effort required for hunting or fishing. Subsistence users may also be excluded from or avoid areas affected by oil and gas development, and some developed areas will likely have firearms restrictions. Population-level effects on subsistence species due to disturbance and infrastructure are also possible. While gravel roads may help facilitate access to some subsistence areas, they could also increase the numbers of hunters from outside the refuge area, thus increasing competition for subsistence resources and perhaps reducing harvest levels for people in the local communities or create direct conflicts among hunters. Contaminant spills could reduce availability of some resources through population effects or result in reduced use or avoidance of some resources due to contamination concerns.

The most prominent subsistence concern with oil and gas exploration on the Coastal Plain involves potential effects on harvest of caribou from the PCH. The Gwich'in Athabaskan people refer to themselves as the caribou people since caribou are their most important food source. Harvests of caribou from either or both the PCH and Central Arctic Herd (CAH) by Gwich'in people in the communities of Arctic Village, Venetie, and several communities in Canada (Old Crow, Aklavik, and Fort McPherson), would likely be indirectly affected by development on the Coastal Plain. Approximately 85% of harvest on the PCH occurs in Canada. The primary calving areas for the PCH are on the Coastal Plain, and for that reason the area is considered sacred ground by the Gwich'in people. If development causes significant disruptions in PCH calving, post-calving or foraging activities, the herd could experience declining calf survival, leading to population declines or changes in migration or other movement patterns, leading to reduced harvest by the Gwich'in. Residents of Kaktovik would likely be similarly affected since their reliance on caribou for subsistence is also quite high, although due to their coastal, north slope location Kaktovik residents have more diverse options for subsistence resources.

Impacts on recreational use would vary widely by season, recreation type and location. Impacts on recreation would be highest in summer and fall when most recreation uses occur and spatially highest along river corridors and the coast. Diminished quality of night sky conditions would result from artificial lighting during winter, early spring, late summer and fall. Increased noise from various sources, including greater amounts of aircraft traffic would similarly affect visitor experiences. Pipelines, roads, material sites, drill and well pads and other infrastructure would physically prevent access to some areas for recreation. Grid lines from winter seismic exploration are easily visible from the air during summer for years following the work. Although these are less visible from the ground, they can still be seen in some areas depending on topography and would diminish visitor experiences of the area. If oil and gas operations change wildlife population levels, behavior or migration routes, wildlife viewing opportunities would be affected.

The vast majority of the Coastal Plain's recreational users expect an experience involving minimal human disturbance, infrastructure or interaction with other visitors or human activity. Because of this, even minimal changes to the Coastal Plain's environment would have significant impacts on visitor experiences. The Arctic Refuge and Coastal Plain are globally recognized as offering unique opportunities for primitive or wilderness recreation, such as expedition-type float trips, fishing, hunting and viewing Arctic wildlife. The visual aspects of the physical setting are considered important by visitors, with undisturbed landscapes being key to high-quality experiences. Even with protective measures in place, any additional light, noise, surface disturbance and infrastructure development would modify the existing

character of the landscape and diminish the quality of recreational experiences. Abandonment of structures and restoration would not return wilderness characteristics to the area and allow the area to revert back to a primitive recreational setting in the long term. Complete restoration would likely not occur within the lifetime of anyone alive at the time abandonment and restoration occurs, and the landscape will likely not ever return to their exact state prior to disturbance. That proper abandonment and restoration efforts would even occur at all throughout the Coastal Plain is not likely given the history of abandonment and restoration of many similar developments in other parts of the United States.

Finally, the vast majority of the Coastal Plain has the qualities and characteristics of wilderness as described in The Wilderness Act, and it is widely recognized as being *de facto* wilderness. Roads and trails, motorized vehicles, facilities and infrastructure and other actions that cause surface disturbance would all affect and diminish the Coastal Plain's wilderness character. Although the purposes included in the ANILCA, that legislatively authorized the Arctic Refuge, do not include wilderness, the public land order that established the original Arctic National Wildlife Range included preserving the area's wilderness character as one of its purposes. Indeed, the almost decade-long campaign to establish the original Arctic National Wildlife Range had the ideal of wilderness at its core. Establishment of the wildlife range was a major event that probably helped catapult the successful passage of the Wilderness Act of 1964 four years later, and for many across the world the Arctic Refuge has become a symbol of wilderness. Wilderness was integral to what eventually became the Arctic Refuge under ANILCA, even if not explicitly acknowledged in the refuge's four original purposes.

I appreciate your considering my views on the Call for Nominations for the pending oil and gas lease sale for the Coastal Plain.

Sincerely,

A handwritten signature in dark ink, appearing to read 'DJF', with a long horizontal stroke extending to the right.

Douglas J Frugé

Yukon Conservation Society



INC. 1968

302 Hawkins St. ☐ Whitehorse, Yukon ☐ Y1A 1X6 ☎ (867)668-5678 ✉ info@yukonconservation.org

December 2nd, 2020

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

Re: Call for Nominations and Comments for the Coastal Plain Alaska Oil and Gas
Lease Sale

Subject: Yukon Conservation Society Comments

The Yukon Conservation Society is a grassroots environmental non-profit organization, established in 1968. Our mission is to pursue ecosystem well-being throughout the Yukon and beyond, recognizing that human well-being is ultimately dependent upon fully functioning healthy ecosystems. We pursue this mission through a broad program of conservation education and analysis, including input into public policy and regulatory processes.

The Porcupine Caribou Herd (PCH) ranges between Alaska (in the United States of America) and the Yukon Territory (in Canada). It is the sole remaining healthy migratory caribou herd in North America (<https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/cosewic-assessments-status-reports/caribou-barren-ground-population-2016.html>).

The Yukon Conservation Society has a long history of advocating for the continued health of the Porcupine Caribou Herd. Actions have included a successful defence of the wintering grounds of the Porcupine Caribou Herd in the Yukon Territory against proposed oil and gas development. This success, which has had a significant benefit to Alaskan harvesters, cannot be sustained without protecting the critical calving grounds in the 1002 lands of the Arctic National Wildlife Refuge (the coastal plain area currently being considered for the oil and gas leases) and by respecting the International Porcupine Caribou Herd Agreement that calls upon the parties to consult with each other should any activity be contemplated that might affect the Porcupine Caribou Herd (<http://extwprlegs1.fao.org/docs/pdf/bi-145059.pdf> Chapter 3, Section D).

The Porcupine Caribou Herd is critically important to the nutritional health and cultural survival of the Gwich'in people in Yukon and Alaska. The ecological and cultural consequences of jeopardizing the Porcupine Caribou Herd are thus so dire that it would, in the opinion of the Yukon Conservation Society, be prudent if the Bureau reversed its decision to allow

Yukon Conservation Society



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development in the 1002 lands of the Arctic National Wildlife Refuge (the coastal plain area currently being considered for the oil and gas leases).

YCS respectfully requests that the Bureau of Land Management, U.S. Department of the Interior halt any and all lease sales in the Arctic National Wildlife Refuge's coastal plain.

Sincerely,

Coral Voss, BA, MDip, MES
Executive Director, Yukon Conservation Society

302 Hawkins Street, Whitehorse, Yukon, Canada Y1A 1X6

Ph: 867-668-5678 (Ext. 3)

E: ed@yukonconservation.org

cc:

Secretary David Bernhardt (US DOI) feedback@ios.doi.gov

The Hon. Justin Trudeau, Prime Minister of Canada, Justin.Trudeau@parl.gc.ca

The Hon. François-Philippe Champagne, Minister of Foreign Affairs Canada, Francois-Philippe.Champagne@parl.gc.ca

The Hon. Jonathan Wilkinson, Minister of Environment and Climate Change Canada, Jonathan.Wilkinson@parl.gc.ca

The Hon. Sandy Silver, Premier of Yukon, Sandy.Silver@gov.yk.ca

The Hon. Pauline Frost, Minister of Yukon Environment Pauline.Frost@gov.yk.ca

Chief Dana Tizya-Tramm, Vuntut Gwitchin First Nation DTizyaTramm@vgfn.net

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

12/16/2020

Subject: Comment on *Coastal Plain Alaska Oil and Gas Lease Sale* (re: Federal Register Document No. 2020-25316)

Dear Director Padgett,


I am writing to oppose oil and gas leasing in all units in the 1002 area of the Arctic National Wildlife Refuge. The best available science clearly shows that leasing in any of the available units will cause irreparable harm to the Porcupine caribou herd, migratory birds, fish and other wildlife that rely upon this landscape. This harm is clearly at odds with the legislation that established the Arctic National Wildlife Refuge which states that one of its specific purposes is the preservation of "water quality and necessary water quantity within the refuge" to conserve fish, wildlife and habitats. Furthermore, oil extraction in the Arctic National Wildlife Refuge will exacerbate ongoing climate change, which is threatening the well-being of humans and natural systems in the Alaska and worldwide. I have provided a list of detailed concerns for all units in an appendix. These strong, scientifically grounded concerns are more than enough to show that oil and gas leasing and extraction should not occur in the 1002 area of the Arctic National Wildlife Refuge in any of the proposed units.

These negative environmental consequences are also inherently threats to the rights of Indigenous peoples who have made this place home for thousands of years. I am extremely concerned about the human rights implications of development in any of the proposed leasing areas. It is clear that the EIS process for leasing was rushed and did not listen to the concerns expressed by the Indigenous peoples of Arctic Alaska and Canada who are faced with an existential threat to their subsistence rights. The Gwich'in peoples of Alaska and Canada call the coastal plain "Iizhik Gwats'an Gwandaii Goodlit" or "The Sacred Place Where Life Begins." This landscape has been the source of spiritual life and sustenance for these communities for thousands of years. Development in the coastal area will desecrate this relationship and threaten the food security of remote communities that depend on subsistence resources like the Porcupine caribou herd to feed their families. The immense threat to human rights posed by this proposed lease sale is shown by a filing made by affected communities to the Inter-American Commission on Human Rights (IACHR). We cannot allow a lease sale that threatens the human rights of Indigenous peoples to continue.

In sum, the selection of the most aggressive leasing plan (B) under the EIS process shows that the EIS process did not adequately consider the severe environmental and societal implications of any development within the 1002 Area of the Arctic National Wildlife Refuge. The decision of the Trump administration to schedule a leasing date for the Arctic National Wildlife Refuge

(January 6th, 2021) before federal officials have had the opportunity to review public comments on the selection of leasing units is only further indication that the administration is not using a fair public process to make leasing decisions. I write today to oppose leasing in all of the units and refer you to specific technical concerns for specific lease units on the subsequent page.

Respectfully,

A handwritten signature in cursive script, appearing to read "Helen Chmura".

Helen Chmura
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Fairbanks, Alaska 99709
315-759-1383
hechmura@gmail.com

SEE APPENDIX OF UNIT SPECIFIC CONCERNS ON NEXT PAGE

Concerns affecting all units:

All tracts should be excluded from oil leasing because of potential negative impacts to denning polar bears and critical polar bear habitat (Map 3-37). These inland denning sites will only become more important for polar bears with the continued loss of sea ice from climate change.

All tracts should be excluded from oil leasing because of potential negative impacts to migratory birds which rely upon the coastal plains for reproduction and molt. I particularly draw the attention of BLM to the yellow-billed loon. While the Map 3-25 indicates that yellow-billed loons are present in barrier islands and may be particularly threatened by oil development there, yellow-billed loons are known to occur and breed on in lakes and rivers in tundra across the North Slope of Alaska. Negative impacts to yellow-billed loons, which are a sensitive species, could occur in any one of the proposed leasing areas.

All tracts should be excluded from oil leasing because of potential negative impacts to water quantity and quality. 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 present EIS does an insufficient analysis of this risk.

All tracts should be excluded from leasing due to the high likelihood of that drilling activity will interfere with wolverine reproduction, food acquisition, movement, and survival. The Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement (EIS) fails to include numerous published studies that robustly demonstrate the negative impacts that leasing activities will have on wolverines within the Refuge. This omission has critical implications for both the ecological dynamics of the Refuge as well as the regions' socio-economic dynamics, since wolverines are an important subsistence resource for Indigenous Arctic communities, including within the Arctic National Wildlife Refuge. Although these impacts should be included in the EIS, they bear directly on the prioritization of leasing tracts. Based on the best available science, none of these tracts should be leased.

Concerns affecting a subset of units:

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 because they are critical calving and post-calving habitat for the Porcupine caribou herd (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, these tracts include essential habitat for Arctic Cod.

Tracts 4, 5, 7, 11, 12, 18, 19, 20, 21, and 28 should not be considered for oil leasing because they provide important habitat for Snow Geese (Map 3-26). As noted in the EIS, the entire western population of snow geese relies upon habitat in the Alaskan and Canadian coastal plain as these birds assemble for migration and as many as 50% of these birds may occur in the Alaska in a given year.



**Bureau of Land Management Alaska
Coastal Plain
Oil and Gas Lease Sale
Nomination and Comment Worksheet**



Name: Tessa Stadel

Company: _____

Address: _____

Phone Number: _____

Email: tessa.stadel@gmail.com

Tract Number	Comments
1	Tract 1 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.
1	Tract 1 should be excluded from oil leasing, as it holds critical calving and post-calving habitat for the Porcupine caribou herd.
1	Tract 1 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.
1	Tract 1 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. pe text here
1	Tract 1 should be excluded from oil leasing, as all tracts (over 90% 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.
2	Tract 2 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. text here
2	Tract 2 should be excluded from oil leasing, as it holds critical calving and post-calving habitat for the Porcupine caribou herd.
2	Tract 2 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.
2	Tract 2 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. pe text here
2	Tract 2 should be excluded from oil leasing, as all tracts (over 90% 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.

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Tract Number	Comments
3	Tract 3 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 the tract would have unacceptable impacts on denning polar bears and polar bear critical habitat.
3	Tract 3 should be excluded from oil leasing, as it holds critical calving and post-calving habitat for the Porcupine caribou herd.
3	Tract 3 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.
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4	Tract 4 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 the tract would have unacceptable impacts on denning polar bears and polar bear critical habitat. pe text here
4	Tract 4 should be excluded from oil leasing, as it holds critical calving and post-calving habitat for the Porcupine caribou herd.
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Mail to:

State Director, Bureau of Land Management Alaska State Office
222 W. 7th Ave, #13 Anchorage, Alaska 99513-7504

For more information or assistance with submitting a nomination or comment, please contact Energy & Minerals Branch Chief Wayne Svejnoha, at 907-271-4407.



**Bureau of Land Management Alaska
Coastal Plain
Oil and Gas Lease Sale
Nomination and Comment Worksheet**



Name: Tessa Stadel

Company: _____

Address: _____

Phone Number: _____

Email: tessa.stadel@gmail.com

Tract Number	Comments
21	This tract 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.
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Tract Number	Comments
4	Tract 4 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
5	Tract 5 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
7	Tract 7 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
11	Tract 11 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
12	Tract 12 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
18	Tract 18 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
19	Tract 19 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
20	Tract 20 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
21	Tract 21 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

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31	This tract should be excluded from oil leasing, as all tracts (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 text.
31	Tract 31 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.
7	Tract 7 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.
27	Tract 27 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.
29	Tract 29 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.
32	Tract 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.

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December 17, 2020

State Director, Bureau of Land Management
Attn: Coastal Plain Alaska Oil and Gas Lease Sale
Alaska State Office
222 West 7th Avenue, Mailstop 13
Anchorage, AK 99513-7504

Re: Call for Nominations and Comments for the Coastal Plain Oil and Gas Leasing Program

Dear Mr. Padgett:

I am writing as not only an aspiring wilderness planner of the National Park Service, but also as a concerned citizen who values the ancestral lands of the Gwich'in Nation. I oppose the Coastal Plain Oil and Gas Leasing Program that the Bureau of Land Management is undertaking to implement the leasing program pursuant to the Tax Act (Public Law 115-97, Dec. 22, 2017). I believe this program lacks sufficient data to assess the significance of the environmental and socio-economic effects which are likely to result from the proposed oil and gas leasing program alternatives in the 1002 lands of the Arctic National Wildlife Refuge.

When President Eisenhower established the original Arctic National Wildlife Refuge Range in 1960, he recognized the entirety of the land, specifically including the Arctic Coastal Plain, is vital to the biodiversity of the entire refuge. The Arctic Refuge Coastal Plain contains the greatest diversity of any protected area above the Arctic Circle, according to the Fish and Wildlife Service. The majesty in the variety of habitat that is compressed in the Coastal Plain (15-40 miles wide) is evidence to how sensitive this area is to environmental change. Any development or disturbance will result in an adverse chain reaction to the array of wildlife that call this land home. These species include, but are not limited to, the polar and grizzly bears, wolves, wolverines, caribou, muskoxen, Dolly Varden char, Arctic grayling, and more than 140 species of migratory birds.

Prior to its establishment as a refuge, this life-giving land, known to the Gwich'in Nation as "Iizhik Gwats'an Gwandaii Goodlit," or "The Sacred Place Where Life Begins" is the post-calving habitat of the Porcupine caribou herd which has been the life force to many indigenous subsistence practitioners. Please reference *The Vulnerability analysis of the Porcupine Caribou Herd to potential development of the 1002 lands in the Arctic National Wildlife Refuge* (Russell and Gunn 2019) as one example of current research that gives substantial evidence as to why this area is vital to the overall health of the Porcupine Caribou Herd. This land is one of the last remaining areas in Alaska's Arctic that exists as it has since time immemorial. It protects the early voices and stories of many indigenous people who remain spiritually connected to their ancestors through the uninterrupted processes currently existing within this sacred place.

Regarding the tracts up for comment:

- 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. (Map for reference: Polar bear critical habitat and denning sites)
- All tracts should be excluded from oil leasing, as it holds critical calving and post-calving habitat for the Porcupine caribou herd. (Map for reference: Post-calving movement of Porcupine caribou and Porcupine herd calving areas)
- Tract(s) #27, 7, 31, 29, 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. (Map for reference: Essential fish habitat)
- 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.
- Tract(s) #4, 5, 7, 11, 12, 18, 19, 20, 21, 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. (Map for reference: Frequency of Occurrence of Snow Geese)
- 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 (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.

If the Coastal Plain Oil and Gas Leasing Program is not to be terminated due to substantial opposition by scientists, the public, and neighboring communities, I request a supplemental EIS to the Final Coastal Plain Oil and Gas Leasing Program EIS be prepared prior to the Sec. 20001 of PL. 115-97 requirement that the land be opened to oil and gas leasing with 400,000 acres offered within 4 years. This is in part due to the current Final EIS lacking the necessary information required for an *up-to-date* thorough and comprehensive understanding of effects this project will have on the environment. Per the 2005 Council on Environmental Quality guidance, a supplemental EIS must be considered when “There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts”. I believe there will be substantial new information relevant to current effects on critical habitats utilized by various wildlife species who depend upon the refuge’s coastal plain as well

as effects on traditional food sources needed by Indigenous populations in Canada and the United States.

I also believe that the Final EIS presents inadequate alternatives as a result of inaccuracies or deficiencies in information;

- The lack of quantitative analysis in the final EIS led to an incomplete understanding of effects and therefore poorly informed the construction of projects alternatives.
- No alternative was presented that analyzed the 800,000 acre minimum lease area requirement identified by Public Law 115-97. All action alternatives exceed the area minimum.
- A comprehensive transboundary effects assessment is missing.

Additionally, I request a transparent explanation to the 2,000 acre limitation covered by production and support facilities outline in P.L. 115-97. This explanation needs to be clear prior to any early stages of a leasing agreement and ideally act as a limiting factor to tract site allowances. This 2,000-acre development area needs to account for carbon emissions and strictly act as a greenspace that is compliant with neighboring wilderness measures (ie: Dark Sky compliant, Air Quality Compliant, Energy Compliant, Fuels Compliant, etc). This area should also have a monitoring protocol, along with the lease sites, that documents, avoids, adapts to, and commits to a transparent, publicly accessible, intensive, comprehensive monitoring plan.

The movement to hastily dismantle protections that were put in place for the Arctic National Wildlife Refuge is a disgrace to who we are as a country and puts emphasis on how we value revenue at any cost, including destroying the only planet we call home. This mindset is wrong and the continued efforts to exploit and plunder one of the most sacred wild places left in this modernizing world is a mistake that will hinder future generations from knowing true wilderness and the ability to honorably adapt to change in a clean sustainable way.

Let our touch on this world be one of kindness, not one of greed.

Sincerely,
Jessica Marie Millman