

# Submit Arctic Refuge Public Comments by March 13th!



## How to submit public comments

1. Write your comments (see Template below)
1. Submit your comments to BLM
  - a. Online :  
<https://eplanning.blm.gov/epl-front-office/eplanning/comments/commentSubmission.do?commentPeriodId=74027>
  - b. Attn: Coastal Plain Oil and Gas Leasing Program EIS  
222 West 7th Avenue, Stop #13  
Anchorage, Alaska 99513 -7504
2. Send your comment along to your [Representatives](#) and [Senators](#) to show your concern

## Tips for submitting public comments

1. **Use a word processor** – Write, compile and edit your comments in a word processor, then cut and paste your comments into the BLM Website to insure your work is not lost in case of a web error, and it allows you to use the letter again to alert your representatives in Congress of your concerns.
2. **Be specific** – BLM suggests that “substantive comments should be as specific as possible.” This public comment period is focused on *objections to and inadequacies with the Draft Environmental Impact Statement*. While you can voice opposition to oil and gas development in the Arctic Refuge overall, specific comments on the Draft EIS is most helpful.
3. **Speak from the heart** – The Arctic National Wildlife Refuge is important. The Refuge is your public land to celebrate and protect. Using your own words creates a unique, substantive claim that BLM is required to consider and gives your comments more weight.

## Template for Composing Public Comments

**\*\*Use/Edit/Cut/Paste the following text to create your own public comments on the DEIS for oil and gas lease sales on the Coastal Plain of the Arctic National Wildlife Refuge\*\***

The Arctic National Wildlife Refuge is a unique national treasure and is no place for oil and gas development. **The Friends of Alaska National Wildlife Refuges stands with Alaskans and Americans in opposing oil and gas lease sales in the Arctic National Wildlife Refuge.** The Draft Environmental Impact Statement (DEIS) by the Bureau of Land Management (BLM) is

insufficient in its analysis of the effects of oil and gas leasing in the Arctic National Wildlife Refuge Coastal Plain and does not fulfill its legal obligation to propose a full range of alternatives to the proposed gas leasing.

## The Purpose of the Arctic Refuge

The established purposes of the Arctic National Wildlife Refuge are *“to conserve animals and plants in their natural diversity, ensure a place for hunting and gathering activities, protect water quality and quantity, and fulfill international wildlife treaty obligations.”* The 2017 Tax Act (Law No: 115-97) added a fifth purpose of the Refuge *“to provide for oil and gas program on the Coastal Plain”* Oil and gas is entirely inconsistent with the purposes of the Refuge because it will cause lasting damage to the animal and plant diversity, disrupt subsistence activities, upset water quality and quantity, and disregard international wildlife protection obligations. **The DEIS fails to analyze how the oil and gas development will interfere with the originally stated purposes of the Refuge.**

## Rushed and Faulty DEIS Process

**BLM’s rush to a hold lease sale this year has resulted in an inadequate Draft EIS and limited public participation.** BLM is legally obligated to thoroughly analyze the effects of oil and gas in the Arctic Refuge. Instead, the scoping review and DEIS process was compressed to just five months, which prevented a thorough analysis. Work on the DEIS continued through the recent government shut-down even though the Arctic Refuge staff and other BLM employees were not available for consultation. Public comment periods and notice of public meetings were abbreviated. For example, the Fairbanks community had only 5 days notice of their local meeting on the DEIS.

**The DEIS fails to uphold BLM’s legal obligations to offer an adequate range of alternatives.** The DEIS offers only three alternatives, all of which allow full oil and gas development. These alternatives fail to adhere to the limits for development and lease sales set by Tax Act. Additionally, the proposed alternatives fail to protect the stated purposes and biological resources of the Arctic Refuge. The DEIS does not offer reasonable alternatives to the proposed oil and gas leasing, nor does it sufficiently analyze the impacts of the alternatives.

**The DEIS is deficient both legally and substantively.** It failed to include: the required analyses, the necessary mitigation measures and alternatives necessary to protect the resources mandated by the established purposes of the Arctic National Wildlife Refuge. BLM must thoroughly and objectively analyze the 680,000 public comments submitted during the scoping process (which ended in June, 2018), carefully consider the concerns expressed by the Gwich’in Nation that will be adversely impacted by the proposed drilling, and conduct the

necessary analyses to understand the impacts of oil and gas leasing in order to comply with federal and international legal obligations.

## Harm to Wildlife

**Caribou:** The Coastal Plain of the Arctic National Wildlife Refuge that is proposed for oil and gas leases provides vital calving and post-calving habitat for the 200,000 animals of the Porcupine Caribou Herd. The Porcupine Caribou Herd depends on the unique ecological resources of the entire Coastal Plain during its annual migration and calving. BLM acknowledged that oil and gas activities will likely disturb and displace caribou, especially sensitive mothers and their young. However, BLM failed to adequately address the impacts on caribou and failed to consider the full range of areas and habitats that are vital to caribou during their annual migration.

**Polar Bears:** 77% of The Arctic Refuge Coastal Plain is designated Critical Habitat for Polar Bears, which are listed as threatened under the Endangered Species Act. The Southern Beaufort Sea population of polar bears, which den on the Coastal Plain of the Refuge, have lost about half their population since 1980. Nearly one third of these bears depend on the Coastal Plain to den and give birth to their cubs. This area of the Refuge is one of the world's largest polar bear denning sites. The DEIS acknowledged that oil and gas activities could cause injury or death to polar bears and that all alternatives would also affect large areas of Critical Habitat. However, BLM failed to identify and analyze mitigation measures that are sufficient to protect the bears, and it did not identify how many bears would be impacted or how the impacts to these bears will affect this threatened species.

**Birds:** The Arctic Refuge Coastal Plain is an essential nesting, foraging, and migratory stopover for millions of birds each year. Over 200 species of birds from every US state and six continents nest on the Refuge Coastal Plain. The BLM analysis of effects on birds is inadequate and contains large loopholes that would allow oil and gas activities to move forward regardless of harm to birds. A thorough analysis of direct and cumulative impacts on world bird populations that spend their summer on the Coastal Plain is necessary to determine the environmental impacts of oil and gas leasing in the Arctic National Wildlife Refuge.

## Disregard for Human Rights and the Gwich'in people

The Gwich'in people of Alaska and Canada are culturally and spiritually connected to the Porcupine Caribou Herd, which in turn relies on the Arctic Refuge Coastal Plain for calving and post-calving habitat. Because of this connection, **the Gwich'in consider the Coastal Plain to be sacred and believe that protecting the Arctic National Wildlife Refuge is vital to their human rights and food security.** A significant portion of Gwich'in subsistence comes from the Porcupine Caribou Herd, BLM concluded that there will be no impact on the Gwich'in

subsistence food source, even while acknowledging oil and gas impacts on caribou. BLM asserted that the Gwich'in do not qualify for an 810 hearing (necessary under the Alaska National Interest Lands Conservation Act), which is required for development that will substantially affect subsistence. The DEIS ignored the traditional knowledge and human rights of the Gwich'in.

## **Harmful Impacts to Water Resources and Air Quality**

**Water:** One of the specific purposes of the Arctic National Wildlife Refuge is to “protect water quality and necessary water quantity.” The DEIS acknowledged that drilling an oil well could use 2 million gallons of water and each mile of ice road uses 1 million gallons of water in this Refuge which has] few fresh water sources, especially in winter. **The DEIS does not clearly depict how much water oil and gas activities could use and how this will affect the Arctic Refuge.** In their comments on the Notice of Intent, Fish and Wildlife Service, which administers the Arctic National Wildlife Refuge, stated, “Water withdrawals from the streams, rivers and springs could have significant and detrimental implications to the populations and habitats of fish and wildlife.” The DEIS failed to fully evaluate the impacts of oil and gas development on the already scarce water resources and the effects on fish, habitat, vegetation, and hydrology.

**Air:** The DEIS failed to meaningfully evaluate potential impacts of oil and gas activities on air quality in the Arctic Refuge. The BLM concluded i that future projects on the Coastal Plain of the Arctic National Wildlife Refuge would be “unlikely” to exceed important air quality standards, but it failed to support this conclusion with sufficient analysis. **The DEIS did not quantify pollution emissions nor did it assess the air quality impacts of oil and gas development on the environment and on human health.**

## **False Limit on Developed Acreage**

The Tax Act that allowed oil and gas leasing requires that only 2,000 acres of the Coastal Plain be impacted by oil and gas development and production. However, BLM interpreted this restriction too narrowly. BLM did not count acreage affected by pipelines, gravel mines, ice roads, or other industry activity (such as seismic exploration) that the agency recognizes will have significant impacts. Areas that supposedly would be “reclaimed” also are not considered in the 2,000-acre limit. Thus, the cumulative footprint of development would be much greater than the 2,000 acre restriction with far more actual development and greater impacts]. **The narrow definition of the 2,000 acre limit would permit greater impacts on the Arctic National Wildlife Refuge than allowed in the 2017 Tax Act.**

## **Other Areas of Concern:**

- **The DEIS failed to consider proposed seismic surveys.** SAExploration LLC plans to conduct seismic exploration surveys on the Coastal Plain during the winters of 2019 and 2020, but the DEIS fails to analyze the impacts of their proposed seismic exploration. The scope of the DEIS is too limited and did not consider the full range of oil and gas activities. BLM is required to consider all of the environmental impacts of the proposed oil and gas program.
- **The DEIS failed to identify the economic value of the Arctic Refuge.** The DEIS recognized that the Arctic Refuge has significant 'ecosystem service values', that is, the biological resources of this land are highly valuable. BLM recognized that their value would be harmed by oil and gas leasing, but it did not conduct an economic analysis to quantify or identify these values or impacts. The DEIS failed to include an economic projection of revenue from lease sales. The DEIS failed to assess the immense value of wilderness and Refuge lands to air and water quality, wildlife, scientific inquiry, human well-being, and America's natural and cultural heritage.
- **The DEIS failed to offer effective mitigation.** The DEIS acknowledged that the proposed oil leasing could disrupt 633,000 acres of caribou habitat, 40% of the Coastal Plain, but its proposed mitigation strategy -- to continue drilling and suspend "major construction activities" for only a single month of the year -- is insufficient. Likewise, the DEIS acknowledged its own proposed action alternatives could cause injury or death to polar bears and would affect large areas of polar bears' Critical Habitat. However, BLM failed to identify and analyze sufficient mitigation measures to protect the bears nor did it identify how many bears could be impacted or how impacts would affect this threatened species. BLM is reliant on lease stipulations and operating procedures to mitigate impacts to the Refuge and the DEIS fails to show how it can enforce any mitigation requirements.
- **The DEIS failed to address climate impacts.** The DEIS fails to provide any analysis of how expanding fossil fuel development in the Arctic Refuge would exacerbate the impacts of climate change already occurring across the Arctic. The DEIS fails to address how to minimize the impacts on climate. Developing oil and gas in the Arctic Refuge is inconsistent with the urgent need to address climate change.
- **The DEIS lacks scientific integrity.** The BLM is required to ensure scientific integrity, acknowledge where it lacks information, and obtain that information. BLM did not acknowledge missing or outdated information in the DEIS and failed to identify the source of the information in analyses. BLM did not conduct any new studies or obtain the missing information. This lack of scientific integrity is evident in its use of outdated studies of polar bears, lack of analysis of caribou calving habitat, and the potential impacts of oil and gas development to birds.