

On behalf of the Friends of Alaska National Wildlife Refuges, we submit the following comments in response to the September 8, 2023 Notice of Availability of the Draft Coastal Plain Oil and Gas Leasing Program Supplemental Environmental Impact Statement, 88 Fed. Reg. 62,104 (Sept. 8, 2023).

Friends of Alaska NWR was created in 2005, with a goal of serving all 16 National Wildlife Refuges in Alaska. The Arctic National Wildlife Refuge is the largest unit of public lands set aside for wildlife in the entire world, not just the United States. This land is mainly pristine, and has supported Indigenous people of interior Alaska and the north coast for time immemorial. Much of the wildlife living here is unique to this part of the world, and their future is already in question due to the uncertainties of unchecked climate change. Our goal as Friends is to advocate on behalf of these wildlife and lands, and seek their protection.

There are four original purposes of the Arctic National Wildlife Refuge, as established by ANILCA: (1) to conserve fish and wildlife populations and habitats in their natural diversity, (2) to fulfill the international treaty obligations of the United States with respect to fish, wildlife, and their habitats, (3) to provide the opportunity for continued subsistence uses by local residents, and (4) to ensure, to the maximum extent practicable, water quality and quantity within the Refuge. You will note that all of these purposes are for conservation.

In 2017, the Tax Act attempted to change the future of the Arctic National Wildlife Refuge, by adding the requirement to hold two lease sales and to add a fifth purpose of the Refuge - allow for fossil fuel exploration and development activities. This fifth purpose is ultimately incompatible with the original four - fish and wildlife conservation cannot take place in a landscape filled with trucks, roads, pipelines, people, and oil. The Lower 48 have merged conservation with fossil fuel exploration and development activities in a number of places, and history proves that conservation always loses. Those landscapes are never as productive again.

One of the primary reasons for the creation of the Arctic National Wildlife Refuge was that this region encompasses a unique unbroken continuum of arctic and subarctic ecosystems. If these inherently incompatible extractive activities are allowed to occur on the Arctic NWR, this landscape will never be the same, never hold the same wildlife value, nor provide the same subsistence resources for the peoples of Interior and coastal Alaska.

The Bureau of Land Management is not required by the Tax Act to allow for any specific level of fossil fuel exploration or development but to explore this activity. Because there are four superseding purposes for conservation, Friends argues that it is in fact BLM's responsibility to ensure that conservation be considered as a priority over the fossil fuel exploration and development goals of the Tax Act of 2017. After reviewing the SEIS, we see no way that the impacts of oil and gas development could be mitigated sufficiently given the types of projected irreversible environmental changes in the environment that will result.

Out of the three latter alternatives, Alternative D is the best attempt at mitigating the impacts through a reduced footprint for development and lease and operational mitigating measures, provided the measures are implemented and enforced. Alternative D, however, does not go far

enough to protect fish and wildlife and their habitats, particularly for the Porcupine caribou herd and polar bears, or subsistence use of the Refuge. As a result, Friends of Alaska NWRs believes that Alternative A as outlined in the SEIS should be the obvious choice, although we recognize that this alternative is not viewed as viable given the restraints of the Tax Act of 2017. Alaska is our country's largest and last remaining wild swath of land, and one of the most rapidly changing places due to climate change. It is fool-hardy to begin a fossil fuel exploration and development program in a place that is sacred to the people who have lived there for time immemorial, protects immense quantities of animals, and has yet to be touched by the development forces that have altered the remainder of the country.

Accordingly, we ask that you keep the Arctic National Wildlife Refuge protected as required by ANILCA by reconsidering and including Alternative A as the preferred alternative in the final EIS. An oil and gas program is inherently inconsistent with the four conservation purposes of the Arctic Refuge, and if implemented, would take priority and precedence over those conservation purposes. We ask that you choose the alternative that protects the Refuge in perpetuity.