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**[EXTERNAL] Arctic National Wildlife Refuge oil and gas lease sale**1 message

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**Doug (user)** <djfruge@comcast.net>  
To: blm\_ak\_coastalplain\_EIS@blm.gov

Fri, Jun 15, 2018 at 7:04 PM

Ms Hayes -

These comments are being submitted on the pending lease sale for oil and gas development rights on the coastal plain of the Arctic National Wildlife Refuge in Alaska.

I am a retired US Fish and Wildlife Service (FWS) employee who was involved in efforts to obtain seismic, surface geology and biological data from the Arctic National Wildlife Refuge (Refuge) in the early to mid-1980s. During that period, I served as the Oil, Gas and Minerals Coordinator for the FWS in Alaska (1982-84) and was a key figure in developing the environmental statement and implementing regulations to govern the congressionally-mandated seismic and surface geology program on the Refuge. I then served as Assistant Refuge Manager for the refuge during 1984-87 and supervised the field level program to monitor oil and gas exploration activities on the Refuge. I was also involved in field studies to gather and analyze baseline biological data during 1984-89 from the coastal plain and helped draft the 1987 report, *Arctic National Wildlife Refuge, Alaska, Coastal Plain Resource Assessment, Report and Recommendation to the Congress of the United States and Final Legislative Environmental Impact Statement*.

As a fish and wildlife resource professional I have strong objections to allowing oil drilling on the Refuge. My objections focus on three principal considerations:

1) Indigenous rights: The Arctic Refuge has sustained the native Gwich'in and Inupiat people for thousands of years. The Refuge's coastal plain provides vital habitat for the Porcupine Caribou Herd, which use the area to bear and nurture their young. The Gwich'in people call the coastal plain "The Sacred Place Where Life Begins." Protecting the caribou is a matter of basic human rights for the Gwich'in. The Refuge's coastal plain and waters also provide fish and other resources important to the subsistence of the Inupiat people. Principal among these are the bowhead whale, polar bear and whitefish. The Inupiat people of Kaktovik also utilize the Porcupine caribou, Dall sheep, wolves and other wildlife resources on the coastal plain and nearby mountains as well. Although I know that efforts to drill for oil and gas would be done in an as environmentally responsible way as possible, serious adverse consequences are unavoidable wherever oil and gas operations are carried out. We know this from experiences in other portions of Alaska and the rest of the world. I do not believe that the long-term impacts to the living resources of the area and their importance to the human inhabitants are worth the short-term and relatively minor economic benefits that would accrue from oil and gas extraction in this area.

2) Biodiversity and natural legacy: The Arctic Refuge is probably the largest protected area in the United States that is still in a condition relatively unchanged by human development. As such it is an important historical and environmental legacy and a remnant of our great land that is still much "as God made it". It contains a vast and unique array of wildlife, including caribou, musk oxen, wolves and polar bears. Nearly 200 species of birds migrate between the Refuge, six continents and all 50 of the United States. The rush to lease and drill is not in line with the precautionary principle that should be applied to such an important area and one of our most exceptional ecosystems. The impacts of further exploration for and production of oil and gas would, in just a few years, irreversibly change the physical and biological characteristics of this important area that have evolved over millions of years.

3) Climate change: The Arctic is experiencing rapid changes due to a warming climate that the vast majority of scientists in the world agree is due to a human-caused increase in greenhouse gases in the atmosphere. Temperatures there are rising at twice the

rate in the rest of the world, which has for years been so predicted by climate science. Villages are being eroded into the sea, permafrost melt is making infrastructure insecure, and food sources are disappearing. Drilling there for more oil to burn and the further consequent increase in greenhouse gases will compound the serious impacts already being experienced throughout the Arctic. This would be a sad instance of adding insult to injury for the people living there as well as for the inhabitants of the rest of the planet. Instead of seeking to drill there for more oil, the Department of Interior's efforts would be better spent in working toward setting Alaska on a more stable and sustainable path toward energy production and use. This has been done elsewhere in the Arctic, with prominent examples in Scandinavia and Iceland that should be mirrored in Alaska. If those people can do it, surely the strongest nation on earth can do the same.

Thank you for considering my comments on this important matter. I urge the Bureau of Land Management to listen to the majority of Americans and decide to not allow an oil and gas lease sale in the Arctic National Wildlife Refuge. The current residents and future generations are looking to your agency to make the right decision.

Doug Frugé

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