



CoastalPlain_EIS, BLM_AK <blm_ak_coastalplain_eis@blm.gov>

[EXTERNAL] NOLS Comments on Scoping Period for ANWR Coastal Plain Oil and Natural Gas EIS

1 message

Chris Brauneis <chris_brauneis@nols.edu>
To: blm_ak_coastalplain_EIS@blm.gov

Tue, Jun 19, 2018 at 2:59 PM

To Whom it May Concern,

Please accept the attached letter.

Thank you so much for your consideration and for providing the opportunity for public comment.

Best of luck with your work, with hopes you have a great week and a safe and engaging summer season.

Sincerely,

Chris Brauneis

CHRIS BRAUNEIS
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**NOLS Alaska ANWR Comments_final.pdf**
318K

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June 18, 2018

Coastal Plain Oil and Gas Leasing Program EIS
222 West 7th Avenue, Stop #13
Anchorage, Alaska 99513

RE: NOLS Comments on Scoping Period for ANWR Coastal Plain Oil and Natural Gas EIS

Sent via email to: blm_ak_coastalplain_EIS@blm.gov

Dear Alaska BLM Land Managers,

Thank you for giving the National Outdoor Leadership School (NOLS) the opportunity to comment on the scoping period for the Coastal Plain Oil and Natural Gas EIS. NOLS is a non-profit educational organization that has been connecting youth to Alaska's wildest places, including the Arctic National Wildlife Refuge, since we started operating in Alaska in 1971. Today, NOLS has field operations that extend around the world throughout 6 continents, 10 countries, and over a dozen US states. Across these locations we graduate approximately 26,000 students a year and serve an alumni network of over 280,000 individuals.

Since NOLS was founded in 1965, the school's mission has been to be the leading source and teacher of wilderness skills and leadership that serve people and the environment. NOLS enacts this mission by teaching students technical skills like mountaineering, kayaking, backpacking, fishing, and packrafting in the most remote and wild places in Alaska. For example, currently, there are two NOLS courses trying to summit Denali, North America's tallest peak, several courses paddling on Prince William Sound, and backpackers trekking across the tundra of the Talkeetna Mountains. It is through these experiences and exposure to wild places that NOLS students learn core leadership skills around communication, self-awareness, personal responsibility, and tolerance for adversity and uncertainty. The transformative outcomes we are able to achieve on these courses are why organizations like the NASA, the US Naval Academy, Google, the Wharton School of Business and many others, partner with NOLS to take courses.

WHY NOLS STANDS IN OPPOSITION TO DEVELOPMENT

NOLS depends on access to wild and pristine landscapes to achieve the student outcomes that make our programs unique and keep our clientele returning. The Brooks Range and the Arctic National Wildlife Refuge have long served as important operating areas for courses in Alaska. Students enroll in these courses expecting to see abundant wildlife including caribou, bears, birds, and other species that depend on the North Slope's coastal plain as critical habitat. NOLS fears that development within the Refuge is a short-sighted decision with the potential to have detrimental impacts on migrating wildlife, Alaska's outdoor recreation economy, and the communities that have traditionally depended on these lands. NOLS asks that the BLM to consider the following objections to future leasing in the Arctic National Wildlife Refuge.

1. **NOLS' business model and others in the guide and outfitter business depend on intact wild landscapes like ANWR.** Alaska boasts a \$7.3 Billion dollar outdoor recreation industry and one of the highest rates of outdoor recreation participation in the country.¹ This is bolstered by the abundance of wild public lands the recreational opportunities that attract people from around the world to visit and recreate. Development in the refuge degrades this area for guides and outfitters who work in the region and who depend upon the abundance of wildlife, scenery, and wilderness qualities of the landscape to attract people to visit.
2. **Industrial development in ANWR threatens wildlife populations in Alaska and across the globe in other NOLS operating locations.** The 1002 area is a significant nesting and staging ground for migratory bird populations that travel through every U.S. State and 5 continents. This means our NOLS students in Patagonia, Mexico, and across

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ROCKY MOUNTAIN / SCANDINAVIA / SOUTHWEST / TETON VALLEY /
THREE PEAKS RANCH / WYSS CAMPUS / YUKON

the United States have the opportunity to see migratory birds that depend on spending their boreal summers nesting in ANWR (examples include the American Golden Plover, and the Arctic Tern).² The degradation of vital habitat for these species as well as other iconic regional species such as caribou and polar bears diminishes our ability to connect students to nature and achieve memorable student outcomes on our courses.

3. **Promoting oil and gas development in ANWR - one of the largest protected wild places left on the planet - is not a sustainable long-term solution for growing the Alaskan economy.** The Outdoor Industry Association has found that outdoor recreation sustains more than four times the number of jobs in Alaska than oil, gas, mining, and logging combined and national and international trends suggest that this industry will only continue to grow with a rising global middle class. To capture this value in the long term, the BLM would be prudent to protect its most iconic and ecologically significant landscapes from industrial development. Wild landscapes like ANWR are becoming scarcer and more valuable, globally.
4. **Respect for the past, present, and future inhabitants of the landscape should be a key component of any leasing decision.** A core component of a NOLS education is the development of a connection with the land that stems from moving through it in a respectful and humble way. This means thinking about both the future generation of users while also being conscientious of the communities and inhabitants that have previously occupied these places.

Finally, as a global organization that depends fundamentally on the existence of protected wild places, NOLS feels that developing ANWR sets a dangerous precedent for the future of protected landscapes. ANWR is seen by academics and leading scientists as one of the most ecologically significant and important wildlife refuges in the world. This was the reason it was established in 1960 by the Eisenhower administration explicitly for the purposes of “preserving unique wildlife, wilderness, and recreational values.” If development is allowed to happen in this landscape it calls into question the protections on other critical landscapes where NOLS and other outfitters currently operate. If this cherished and remote corner of the world can’t be protected from the footprint of industrial development, what can?

We appreciate the opportunity to express our objection to the development in ANWR’s 1002 area. NOLS anticipates being involved in this process and working as a productive partner to the BLM going forward.

Sincerely,



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Citations:

- (1) OIA: https://outdoorindustry.org/wp-content/uploads/2017/07/OIA_RecEcoState_AK.pdf
- (2) US Fish and Wildlife Service: <https://www.fws.gov/refuge/arctic/birdworldmig.html>

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